

**QUALITY ASSURANCE CHALLENGES FOR PRIVATE PROVIDERS IN POST-
SCHOOL EDUCATION AND TRAINING IN SOUTH AFRICA**

by

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'Quality does not happen by accident. It requires commitment and constant attention from all those who are involved in the process.' S. B. A. Isaacs (CEO, SAQA, 2000)

DECLARATION

I, Jacqueline Baumgardt, hereby declare that:

- The work in this thesis is my own original work;
- All sources used or referred to have been documented and recognised; and
- This thesis has not previously been submitted in full or partial fulfilment of the requirements for an equivalent or higher qualification at any other recognised educational institution.



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ABSTRACT

Quality assurance has been a vexed and troubled journey for private providers in South Africa in a complex and burdensome educational environment. It is well recognised that private providers are significant role-players in the provision of education and training in South Africa and the stated intention is to create a more enabling regulatory framework

The focus of this thesis is on the private providers at the post-school level. The quality assurance regime was examined and contextualised to analyse what is required, and to determine how the private provider is impacted by the regulatory requirements for the establishment and operation of a private tuition provider in South Africa. The experience of private providers, CEOs of professional bodies, ETQA managers and ETD practitioners was investigated using a mixed methods research approach.

The conclusion is a call for a far more streamlined system with a centralised oversight body, greater stakeholder consultation, less political interference and a deeper appreciation for the contribution that private providers make to the education of learners in South Africa.

Key words: curriculum, faculty key skills and abilities, globalisation, institutional design, institutional leadership, internationalisation, learner profiles, marketisation, massification, open systems thinking, policies and practices, post-school education and training, private providers, privatisation, quality assurance, regulatory authorities, resources, stakeholders.

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ACRONYMS AND ABBREVIATIONS

ABET Adult Basic Education and Training

APQN Asia Pacific Quality Network

AQP Assessment Quality Partner

CEO Chief Executive Officer

CEP Community of Expert Practitioners

CHE Council on Higher Education

CHEA Council for Higher Education Accreditation (USA)

CHET Centre for Higher Education Transformation

CIPC Companies and Intellectual Property Commission

CSSA Chartered Secretaries Southern Africa

DBE Department of Basic Education

DHET Department of Higher Education and Training

DQP Development Quality Partner

DTI Department of Trade and Industry

ENLACES Latin America, Caribbean

ESU European Students Union

ETD Education, Training and Development

ETQA Education and Training Quality Assurance body

FASSET Financial and Accounting Services SETA

FET Further Education and Training

GDP Gross Domestic Product

GENFETQA General and Further Education and Training Quality Assurer (also known as Umalusi)

GET General Education and Training

GFETQF General and Further Education and Training Qualifications Framework

HEI Higher Education Institution

HEQC Higher Education Quality Committee

HEQF Higher Education Qualifications Framework

HET Higher Education and Training

IEB Independent Examinations Board

INQAAHE International Network for Quality Assurance Agencies in Higher Education

IODSA Institute of Directors in Southern Africa

IT Information Technology

MBA Masters in Business Administration

MESALC Map of Higher Education of Latin American and the Caribbean

MTM Market Type Mechanisms

NAICU National Association of Independent Colleges and Universities

NCHE National Council on Higher Education
NGO Non-Governmental Organisation
NQF National Qualifications Framework
NSC National Senior Certificate
NSDS National Skills Development Strategy
NSF National Skills Fund
NSFAS National Student Financial Aid Scheme
NSSE National Survey of Student Engagement
OAU Organisation of African Unity
OBE Outcomes-Based Education
PHEI Private Higher Education Institution
PIHEs Private Institutions of Higher Education
QCTO Quality Council for Trades and Occupations
QDF Quality Development Facilitator
RIACES Ibero-American Network of Accreditation Agencies
SADC Southern African Development Community
SAICA South African Institute of Chartered Accountants
SAIPA South African Institute of Professional Accountants
SAQA South African Qualifications Authority
SARUA Southern African Regional Universities Association
SDLA Skills Development Levies Act
SETA Sector Education and Training Authority
SMMEs Small, Micro and Medium Enterprises
UK United Kingdom
UNESCO United Nations Educational, Scientific and Cultural Organisation
UNISA University of South Africa

Referencing abbreviations

n.p. No page

n.d. No date

CHAPTER 1

INTRODUCTION AND BACKGROUND

1.1 INTRODUCTION

The focus of this thesis is the plethora of private tuition providers operating in both Further Education and Training (FET) and Higher Education and Training (HET) at the post-school education level in South Africa. It should be noted that “FET private providers as a sector have not been intensively researched, either qualitatively or quantitatively” (Umalusi, 2008: 2) because state policy and the research underpinning policy have tended to focus on public provision as a priority. Private higher education has also received little attention at a national level and has been viewed as competition for the public sector (CHE, 2009a: 1). Thus, it merits investigation.

By law, private providers are required to be accredited (South Africa: Further Education and Training Colleges Act, 2006, No 16 of 2006; South Africa: Higher Education Act, 1997, No 101 of 1997), although many are not (Nxesi, 2006: 8; SACSAS, 2010: 8; MQA, 2011: 11). In January 2013 (SAQA, 2013a: n.p.), there were 87 accredited Private Higher Education Institutions (PHEI), a further 31 provisionally accredited PHEIs, and some 974 private Further Education and Training (FET) providers (Umalusi, 2013: n.p.), offering certificates, diplomas and degrees courses in a wide range of disciplines, including inter alia, health and beauty, theology, marketing, business skills, technology, and arts and culture. The Association of Private Providers of Education, Training and Development (APPETD) (2009: n.p.) claims to represent approximately 600 private providers with 600 000 learners in the Higher Education and Training (HET), FET, Adult Basic Education and Training (ABET) sectors including in-house training providers, distance education providers and training centres. Clearly, private providers represent a significant part of the post-school educational infrastructure.

These providers may offer tuition for full qualifications, unit standards training, skills programmes, learnerships or short learning programmes, at all levels of the National Qualifications Framework (NQF) (Umalusi, 2008: 29). Metcalfe (2010: n.p.), in discussing the role of private providers, stated that “the Government ... sees that there is an important role to be played by the private providers within the National Skills Development Strategy (NSDS) III” and that “there is ... a niche market for private providers and a need for private

providers to address rapid response areas”. However, there is concern about private providers as evidenced by a press release in which Dr Rakometsi, the Chief Executive Officer (CEO) of Umalusi, is quoted as saying the following:

We are very concerned about the reputation of private provision in South Africa – private providers operating illegally exploit and mislead learners and this is very damaging to the whole private education sector – by this we mean independent schools, private FET colleges and adult learning centres.

Umalusi (2010: n.p.)

It is not the intention of this research to focus on illegal, unaccredited private providers. Nevertheless, this concern brings the private provider under the spotlight and provides motivation for the investigation.

1.2 THE AIM OF THE RESEARCH

The particular focus of this thesis is on private providers: the so-called Private Higher Education Institutions (PHEIs) and private Further Education and Training (FET) Colleges as opposed to public providers such as universities and public FET colleges or schools. This thesis critically examines the nature of quality assurance in education including quality assurance frameworks, policies and practices in both the international and national arenas and how this plays out in practice. Through a close examination of these frameworks, policies and actual practices, the thesis seeks to explore the impact of the current quality assurance system on the private provider.

The objectives of the research will be:

- to determine the *raison d’etre* of the private provider;
- to understand why quality assurance has become such a critical focus in education;
- to examine what mechanisms have been put in place in the South African education and training system to instil a quality assurance mindset or culture into all the various stakeholders;
- to identify what problems there are with existing quality assurance policies, practices and processes;
- to understand how private providers manage quality assurance in their respective organisations; and

- to determine whether there are alternatives to the current models and paradigms of quality assurance in private post-school education and training in South Africa.

1.3 MOTIVATION FOR THE RESEARCH

Much of the literature on quality assurance discourse within the education sector focuses on public higher education, particularly on universities and other public institutions. While higher education institutions such as PHEIs or other private providers have also been the focus of considerable research, there is little available research on the actual experience of the private higher education provider and even less on other private providers such as short course providers, workplace providers and FET providers. Most of the literature seems to focus on the experience from the quality assurer's perspective. The study, therefore, breaks new ground in seeking to present the education authorities and quality assurance bodies with a picture of the experience of the "implementers" of quality assurance in the private education arena, and may, therefore, provide some input into future policy development.

A greater understanding of the position of the private provider by the education authorities would go a long way to ironing out some of the tensions and fears of the providers. A standardisation of the processes and procedures that are currently required with the potential reduction in the need for staff, facilities and resources, and therefore a more cost-effective system of quality assurance, would potentially benefit the government and the providers alike. It would also be easier to monitor and control and possibly lead to enhanced quality in the education system with the spin-off of better-qualified students with greater potential for employment.

1.4 A BRIEF OVERVIEW OF POST SCHOOL EDUCATION AND TRAINING

Subsequent to the political changes in South Africa in 1994, there has been a notable shift in education toward upskilling large numbers of previously disadvantaged individuals (National Training Board, 2004: n.p.). There have been three National Skills Development Strategies that have attempted to address this issue, namely NSDS I (2000-2005), NSDS II (2005-2010) and NSDS III (2010-2015). Following on from the first two strategies, the third National Skills Development Strategy (NSDS III) (Department of Higher Education and Training, 2010: n.p.), continues to emphasise the need for increased access to training and skills development opportunities in order to achieve the fundamental transformation of inequities linked to class, race, gender, age and disability. This is coupled with the imperative of

meeting the educational needs of a fast-changing, more upwardly mobile society driven by “expansion, resource scarcity, increased competition, accountability to more stakeholders and the growing complexity of knowledge” (Mhlanga, 2008: 1).

Furthermore, the globalisation and internationalisation of education has placed demands on education systems throughout the world for higher standards and better quality (Larsen, 2008: n.p.; The European Centre for the Development of Vocational Training, 2009: 46; Martin & Stella, 2010: 8), leading to the creation of quality assurance frameworks, underpinned by political ideologies, as well as quality assurance policies and practices.

The global trend towards quality assurance in education has led to a plethora of regionalised educational protocols, such as the Bologna Process, the Bruges-Copenhagen Process, the Lisbon Strategy and its successor, the ‘EU2020’ Strategy, (all in Europe), the Brisbane Communique (in Australasia), ENLACES (in Latin America and the Caribbean), the African Higher Education Area (in Africa) and the SADC Protocol on Education and Training. Locally, South Africa established the South African Qualifications Authority (SAQA) in terms of the SAQA Act, No. 58 of 1995 (Mehl, n.d.: 22), and quality assurance has since been expressed in the development of policies, structures and systems at national and institutional levels, such as:

- the Accelerated Shared Growth Initiative – South Africa (AsgiSA);
- the Joint Initiative for Priority Skills Acquisition (JIPSA);
- Broad-Based Black Economic Empowerment (BBBEE);
- the Skills Development Act, No 97 of 1988, and the accompanying Skills Development Levies Act, No 9 of 1999; and
- the promulgation of the National Qualifications Framework Act, No 67 of 2008, and the establishment of Quality Councils (the Higher Education Quality Council, (HEQC); Umalusi (the GENFETQA), and the Quality Council on Trades and Occupation, (QCTO).

Such laws, policies and projects keep changing the quality assurance landscape and adding complexity to it (Patel, 2008: 4). For example, each of the quality councils has devised its own criteria, quality assurance policies and processes, application forms, and monitoring systems. In addition, the Department of Basic Education and the Department of Higher Education and Training (formerly a single Department of Education) have their own criteria, policies, application forms and monitoring systems. Until 2011, providers were expected to

register with, and be accredited by, at least two different bodies. There are various scenarios depending on which level of education the provider offers, for example: registration with the Department of Education and accreditation by SETA; or registration with the Department of Education, Umalusi and/or CHE, and accreditation by the HEQC and/or a SETA. Since 2011, providers are required to register with, and be accredited by, only one of the quality councils, either Umalusi, the HEQC or the QCTO.

According to the NQF (n.d.: n.p.) accreditation refers to the process whereby “if an institution or provider meets the quality requirements laid down by the responsible body, it is therefore approved to carry out its functions and deliver what it says it can deliver”. This may, or may not include learning programme approval. In some cases, accreditation and learning programme approval are required as two separate processes. Learning programme approval may be a condition for accreditation, among other criteria, while in other contexts accreditation may not involve learning programme approval. In yet other instances, there may be providers who are accredited by one body, but may need to submit programmes for learning programme approval to a different body, depending on who has responsibility for the standards in question.

Consequently, the burden in cost and resources of these bureaucratic changes is borne particularly by private providers tasked with a multiplicity of compliance regimes rather than quality assurance per se.

In contrast, public institutions are deemed to be accredited by law (National Qualifications Framework, n.d.: n.p.), irrespective of their performance or outputs. However, many debates at conferences, in the press, in parliament and in academia (News24.com, 2010: n.p.; Ministry of Education, 2001: n.p.; Bloch, n.d.: n.p.; Nkomo, n.d.: n.p.) point to deep systemic problems in the public education arena, such as:

- inequalities in the school system (CHE, 2007: 42);
- the fact that the school system does not interface well with higher education (CHE, 2007: 20);
- in the higher education system itself:
 - the overall quality and quantity of graduate and research outputs (National Plan for Higher Education, 2001: n.p.);
 - management, leadership and governance failures (Leuscher, 2007: 12);

- lack of representative staff profiles (CHE, 2009a: 20);
- entrenched institutional cultures (National Plan for Higher Education, 2001: n.p.); and
- the increased competition between institutions (CHE, 2009a: 1).

In 2009, the Minister of Higher Education and Training (Nzimande, 2009: n.p.), noted a lack of significant change since the National Plan for Higher Education was mooted in 2001, despite progress in changing the racial profile of higher education institutions and the introduction of a national skills strategy, specifically aimed at redressing historical inequity.

The Minister of Finance, Mr Pravin Gordhan (2011: n.p.), in his 2011 budget speech, indicated that “Education takes up the largest share of government spending – 21 per cent of non-interest allocations – and receives the largest share of the additional allocations”; and added that the Ministers of Basic Education and Higher Education and Training “...exercise stewardship ... over the largest network of service providers in our economy, and the most important programme of investment in future growth and redistribution.”

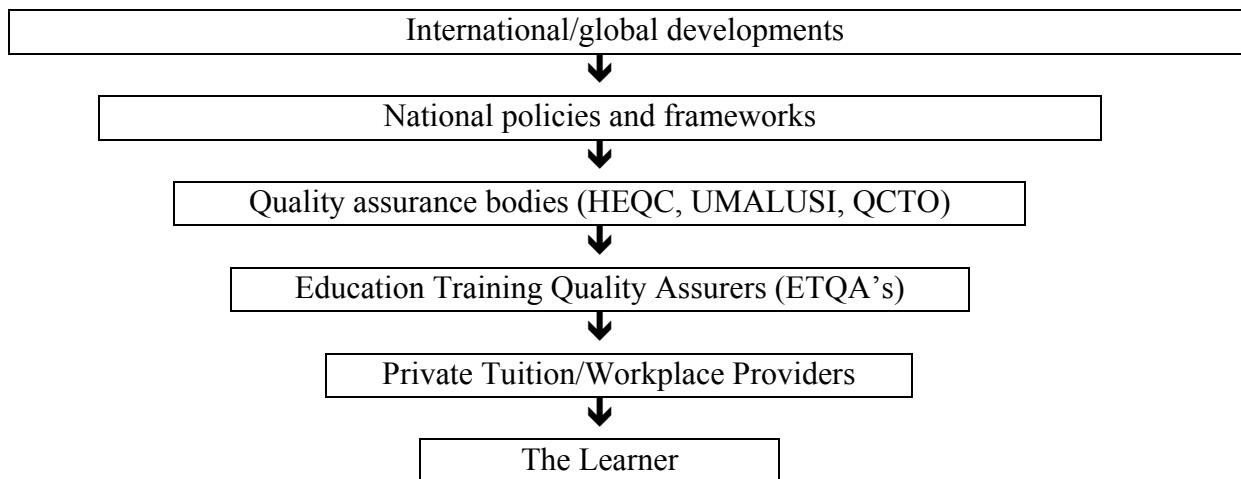
Given the generous budget, coupled with the focus on education in South Africa, the expectation would be excellence in the quality of education across the entire education system. The view of this researcher and others active in the field is that this is not the case. Children at school generally have inadequate numeracy and literacy skills; only 26.6% of matriculants achieve university entrance (Scherer, 2013: n.p.), and university throughput rates are lower than 50% (characterised by high drop-out rates and students taking longer than four years to complete an undergraduate degree) (Kadalie, 2011: n.p.). On the other hand, according to Varghese (2006: 43), the academic performance of students in Private Institutions of Higher Education (PIHEs) in Africa is generally better than that in public universities, despite the fact that these students may have a lower-level academic profile.

What should or could be done to improve the quality of the South African education? This thesis will aim to answer the question by examining the role and standards of private providers.

1.5 THE PLACE OF THE PRIVATE PROVIDER IN THE QUALITY ASSURANCE SPIRAL

Private providers are near the bottom of the “quality assurance spiral” depicted in Figure 1.1, below.

Figure 1.1: The quality assurance spiral



The hierarchical disparity between the top and bottom tiers is so pronounced that there is only a tenuous connection between them. The global developments are far removed from the tuition or workplace provider represented near the base of the diagram. The burden of quality assurance bears down upon these institutions, which, at the end of the process, are expected to produce skilled and knowledgeable students who can perform competently in the workplace. Nevertheless, as already stated, there is limited understanding of private providers, who they are, how they operate and the outcomes of the tuition they provide.

This raises a question, supported by Haakstad (2010: 2), who asks: "... with reference to external quality assurance, how distant can quality assurance be from the actual objects of assessment [namely the students – my insertion] – and still make valid observations and judgements?"

1.6 PRELIMINARY WORK ON THE TOPIC

In my professional capacity (Accreditation Manager for Chartered Secretaries Southern Africa) my responsibility is to accredit, via a quality assurance template, the tuition providers who wish to offer tuition for the various programmes examined by this professional body. I have noted a wide variance between institutions, ranging from well-established, well-resourced, up-market institutions to small, medium and micro-enterprises (SMMEs) which are generally under-resourced. All of these, on paper, meet the minimum requirements for accreditation.

I have also observed that, on the whole, most private institutions have been preoccupied with developing quality assurance policies and systems in order to comply with the requirements of the various quality assurers as listed above, namely the HEQC, Umalusi, the Departments of Education (the DHET and DoBE) and the newly established QCTO. However, this has led to the development of policies and mechanisms that are more concerned with standardisation of procedures, with the quality assurance bodies trying to make all private tuition providers fit into a “one-size-fits all” model in terms of compliance, rather than with the enhancement of academic practice.

Many institutions and researchers support this point of view. They emphasise that quality assurance is concerned with consistency of standards (Dublin Institute of Technology, 2010: 12); and conformity with national quality assurance models (Ajayi & Ekundayo, 2008: 217) for the purpose of certification of students (UNESCO, 2007: 37), as opposed to excellence and competence of the learners (Sacht, 2010: n.p.). This does not seem to be the real purpose for which quality assurance in education is intended.

The contention of this thesis is that the establishment of quality assurance policies and the putting in place of structures and procedures for accreditation purposes do not necessarily lead to improved output of the academic and training programmes, that is, the improved performance and competence of students who are the products of the tuition providers in question. Looking at the issue from the perspective of the learner, Haakstad (2010: 2) agrees: “The attainment of learning aims, always the end orientation point of educational programmes, also becomes the all-important quality indicator,” but he goes on to ask the following interesting question: “... how can educational quality be fairly assessed when this quality is as much dependent on the student’s ability and effort as on what the institution actually provides?”

1.7 PROBLEM STATEMENT

The research falls into the topic area of education management; more specifically, quality assurance management in the context of private providers of post-school training and education in South Africa. In this instance, the research investigates the private tuition provider’s experience of quality assurance, in order to provide a greater level of understanding of the issues they face and the benefits they experience in this regard, as well as the contribution that they make to the educational environment.

A recent survey (Baumgardt, 2011: 9) emphasises the point that for most providers, quality assurance is an internally-driven process that would be in place irrespective of the requirements of accrediting bodies. This indicates that private providers' concern about the quality of their provision is rooted in the clear realisation that their businesses would not survive without quality provision. Therefore, the issue is not so much about whether private providers offer, or at least aim to offer, a quality service, but about what they have to do to prove this. The fact that private providers must in some cases be accredited by two or more quality assurance bodies is one of the key issues. Having to undergo several quality assurance audits for accreditation with one or more assurance bodies is clearly onerous. For a micro-provider, with limited financial and human resources, it becomes even more difficult. It should be noted that according to the Department of Trade and Industry (the DTI) (2008: xxxiv¹), of the economically active enterprises in education, almost 80% were either micro enterprises or very small enterprises. SAQA (2004) identifies such organisations as requiring "developmental support" in order for them to reach the minimum quality assurance criteria, but also states that "The cost of gaining accreditation may prove to be unaffordable for the majority of these providers" (SAQA, 2004: 7).

From the narrative description of the problem stated above, the following main research question has been formulated:

- What are the quality assurance challenges that post-school private education and training providers experience?

1.8 CHAPTER DIVISION

Chapter 1 contains an introduction to the investigation, the problem statement (and possible sub-problems), the aim (and possible auxiliary objectives) of the investigation, a description of the methods of investigation, and the value of the investigation.

Chapter 2 provides an explanation of terms and definitions of key concepts in quality assurance management in education, the theoretical frameworks on which the thesis is derived and a conceptual framework for the investigation. The literature review takes an in-depth look at the theory of social change, stakeholder theory, the policy frameworks, policies, processes and procedures that are in place in South Africa, in order to gain an understanding

¹It should be noted, that these are the latest figures available at present.

of the regulatory environment and the challenges that are presented to providers in their endeavours to become accredited, and meet quality assurance requirements. In addition, the place and contribution of the private provider in post-school education and training within the context of South Africa are discussed.

Chapter 3 examines the trends in private education taking place on a global scale. Key constructs such as human capital theory and the macro-environment of education are discussed.

In Chapter 4 the research design is described. Here the methods are explained in detail with regard to the particular research so that the reader knows exactly how the research has been undertaken as well as how the findings were arrived at.

Chapter 5 provides the results and an analysis and discussion of the results.

Chapter 6 serves as a synthesis of the results as well as conclusions with reference to the problem postulation and aims of the study, proving that they have been honoured. Finally, well-argued recommendations for the future are provided.

1.9 RESEARCH DESIGN

1.9.1 Research Design Methods

Research methodology refers to the philosophy and theoretical perspectives that undergird an approach (Leedy & Ormrod, 2005: 12), while a research method or design is more specific in the sense that it addresses the actual approach or strategy that the researcher will follow in a particular study.

There are two main approaches to research, namely qualitative and quantitative. The challenge would be to decide what the most appropriate approach should be. The decision is not so much about whether one method is better to resolve the problem than the other, but rather which method will deliver appropriate findings to the problem at hand with the least cost and within the time available. The suitability and appropriateness of the method are important considerations as well.

According to Leedy and Ormrod (2005: 94) “Quantitative research is used to answer questions about relationships amongst measured variables with the purpose of explaining, predicting and controlling phenomena”, while information is considered qualitative in nature

if it cannot be analysed by means of statistical techniques (Coldwell & Herbst, 2004: 13). The qualitative method supports more ‘subjective’ research which seeks to understand and interpret social issues. Collis and Hussey (2003: 53) emphasise that the focus of qualitative research is on the subjective elements of human activity by seeking to understand the meaning of what is being ‘seen’.

1.9.2 Research Approach

1.9.2.1 Mixed methods approach

The research for this thesis uses a mixed methods research approach which is a rapidly emerging research paradigm. Mixed methods research refers to those studies or lines of inquiry that integrate one or more qualitative and quantitative techniques for data collection and/or analysis. Borkan (2004: n.p.) states that “qualitative data collection methods, such as interviews, focus groups, or participant observation, are now almost routinely used as exploratory phases of subsequent, more quantitative surveys” (which include hypothesis formation). According to Brannen (2005: 4), mixed methods research means adopting a research strategy employing more than one type of research method – the methods may be a mix of qualitative and quantitative methods, a mix of quantitative methods or a mix of qualitative methods. However, if one is only using a number of methods within the same research domain, that is, either quantitative or qualitative, technically speaking, this is not a true mixed methods approach, which is more likely to be a combination of methods from both the qualitative and quantitative domains. Mixed methods research also means working with different types of data. The aim is to provide an integrated analysis (Bazeley, 2010: 1) of the data to present a fully rounded picture of the problem under consideration.

1.9.2.2 Research questions in a mixed methods approach

Teddlie and Tashakkori (2009: 129) define mixed methods research questions as questions “concerned with the unknown aspects of a phenomenon and are answered with information that is presented in both narrative and numerical forms”. They recommend developing one mixed methods question that serves as an overarching question, which can be extended into qualitative and quantitative sub-questions. In addition, Teddlie and Tashakkori (2009: 112) have developed a typology comprising the following three general categories for identifying various reasons for conducting mixed methods research:

- personal reasons for conducting the study – mixed methods research presents an opportunity for enhancement of my personal skills in research, as I have not previously undertaken any quantitative research;
- reasons associated with advancing knowledge – using a mixed methods approach allows for collaboration between researchers who generally tend to stick to one or other of the more traditional paradigms, thereby broadening the perspectives of both and enhancing the level of thinking around the research problem. In other words, it helps the researcher to think about an issue from different perspectives, and thereby to arrive at better, more creative solutions (Brannen, 2005: 5); and
- societal reasons associated with improving or empowering society, institutions, and oppressed groups (this current research would serve to empower institutions such as quality assurance bodies as well as private providers – in a tenuous sense, an “oppressed group” (Teddlie & Tashakkori, 2009: 93)). Because it involves practical enquiry, the results of a mixed method strategy are likely to be more acceptable to policymakers and would help to bring about possible changes to policy and practice (Brannen, 2005: 6) – one of the objectives of the current research.

Adhering to this three-component process has helped me to develop the research question.

1.9.2.3 Research design in a mixed methods approach

Drawing upon Morse (2003: 197), the possible permutations of research designs may be presented in terms of both the sequencing and dominance of qualitative and quantitative methods. The research design of this thesis is Morse’s “4. QUAL > quan” design, meaning that qualitative research predominates. There was a questionnaire aimed at the main target group (namely accredited private providers), a questionnaire aimed at the ETQA quality assurance managers, and a questionnaire aimed at Chief Executive Officers (CEOs) of professional bodies, a semi-structured interview with one ETQA manager and one CEO, and an online focus group, with document research taking place continually.

The issue was determined by the feasibility of particular methods. One feasibility issue concerns the nature of the research population; whether the population is difficult to access or not may affect choice of method. In this instance, access to the research population was fairly easy as contact information is in the public domain on SETA websites, and so a survey was appropriate. Semi-structured interviews were used with those in powerful positions in

organisations, such as the CEOs of professional bodies “since their perspectives are likely to be ...unique within an organisation” (Brannen, 2005: 10). An online focus group was arranged in order to provide a diversity of opinions and provide a degree of triangulation. The members of the focus group drew from a wide range of participants, such as those involved with quality assurance and accreditation in an organisation and ETD practitioners.

1.9.3 Sampling

1.9.3.1 Definitions

Coldwell and Herbst (2004: 74) define sampling as “the act, process or techniques of selecting a representative part of a population for the purpose of determining parameters or characteristics of the whole population”. In deciding on an appropriate sample to address this problem, the researcher focused on ensuring that the target population was representative, identifying the sampling frame and deciding on the sample size. Table 1.1 below graphically presents the projected study sample as follows:

Table 1.1: Selected sampling frames

Respondent group	Target Population	Sample	%	Source
Principals or accreditation managers of tuition providers	8 000	Opportunity sample	62	The websites of the SETAs – see Appendix A
Quality assurance officials (at each ETQA)	23	23	100	NQF website (NQF, n.d.)
CEOs of recognised professional bodies	39	39	100	SAQA website (SAQA, n.d.: n.p)
Skills Universe forum	318	Volunteer sample		www.skillsuniverse.com

1.9.3.2 Data collection

Research on quality assurance can amount to a very detailed exercise as one seeks to gain a better understanding of the nature of the problem. Data interpretation, reflection and analysis of substantial sources of data, occurred throughout this research process, using various methods. The researcher used a mixed methods approach relative to the research objectives, as indicated below:

So as to be fully representative, the goals were:

- to conduct an online survey, by means of a self-administered questionnaire including both quantitative and qualitative questions, of an opportunity sample of the principals or accreditation managers of accredited tuition providers in South Africa;
- to conduct an online survey, by means of a self-administered questionnaire including both quantitative and qualitative questions, of the total population of professional bodies in South Africa;
- to conduct an online survey, by means of a self-administered questionnaire including both quantitative and qualitative questions, of the total population of ETQA managers in South Africa;
- to develop and administer a question schedule for the online focus group, whose responses to various questions posed on the forum were utilised for purposes of qualitative analysis;
- to develop and administer question schedules for the semi-structured interviews with an ETQA manager and a CEO of a professional body (one of each). The interviews were recorded and the transcripts were utilised for purposes of qualitative analysis.

1.10 ANALYSIS OF THE DATA

I classify myself as a novice researcher with some expertise in qualitative analysis but little expertise in quantitative analysis or knowledge of statistics. It is with this thought in mind that I offer the following explanation of how the data analysis was carried out.

1.10.1 Qualitative Analysis

Tere (2006: n.p.) states that qualitative analysis can be regarded as a continuum, with highly qualitative, reflective types of analysis at one end, and on the other end, those which treat qualitative data in a quantitative way, by counting and coding data.

There are many methods described in the literature, but for my purposes, the following three were used.

1.10.2 Thematic Analysis

Thematic analysis (Tere, 2006: n.p.) is highly inductive, in that the themes emerge from the data and are not imposed upon it by the researcher. In this type of analysis, data collection

and analysis take place simultaneously. Even background reading and the literature review can form part of the analysis process, especially if it can help to explain an emerging theme.

Looking for themes involves coding. This is the identification of passages of text (or other meaningful phenomena) and applying labels to them that indicate they are examples of some thematic idea (Rubin & Babbin, 2009: 483). This labelling or coding process simply enables researchers to quickly retrieve and collect all the text and other data that they have associated with some thematic idea so that they can be examined together. Different cases can be compared in that respect.

The coding can take many forms. In this thesis, the coding was open coding in which “codes are suggested by the researcher’s examination and questioning of the data” (Rubin & Babbin, 2009: 497).

1.10.3 Comparative Analysis

Closely connected to thematic analysis is comparative analysis (Tere, 2006: n.p.; Gibbs, 2010: n.p.) where data from different settings or groups at the same point in time or from the same settings or groups over a period of time, are analysed to identify similarities and differences. Comparisons may be presented in tables or matrices. The data from different people are compared and contrasted, and the process continues until the researcher is satisfied that no new issues are emerging. This method was used to compare the experiences of the private tuition providers, practitioners in the field of post-school education and training, regulatory authorities and accrediting bodies; and professional bodies.

Comparative and thematic analyses are often used in the same project, with the researcher moving backwards and forwards between transcripts, memos, notes and the research literature.

1.10.4 Quantitative Analysis

Quantitative data analysis, on the other hand, according to University of the West of England (2010: n.p.), makes use of descriptive statistics including measures of central tendency (mean, median and mode) and measures of variability about the average (range and standard deviation). These give the reader a 'picture' of the data. This thesis used measures of central tendency, while measures of dispersion were not used, as I did not consider them relevant to this study.

1.11 CHAPTER SUMMARY

This chapter provided a broad background to the problem of quality assurance for private providers in the post-school sector in South Africa, as well as providing a brief outline of the research plan. The next two chapters explore various issues raised in chapter one.

CHAPTER 2

THE QUALITY ASSURANCE SYSTEM IN SOUTH AFRICA

2.1 INTRODUCTION

This chapter investigates the quality assurance system in South Africa, since this is the key to unlocking the research question: what are the challenges experienced by private providers in post-school education and training in terms of quality assurance?

Education and training providers are at the base of the quality assurance hierarchy (see Figure 1.1, Chapter 1) in that they are the organisations that actually provide the teaching and learning environment for their ‘clients’, namely the learners, whom the education and training system is meant to serve.

The questions I had in mind when starting this research were derived from Schoenfeld (1999: 9) which ask:

- How can the issue under investigation be framed so that the contribution to our understanding of quality assurance in education is as broad and deep as possible?; and
- How can this thesis be situated so that it makes a significant contribution to practice?

So, not only does this thesis aim at a conceptualisation of quality assurance in education from a theoretical perspective as it reflects on the current state of play, but it also aims at the improvement of practice in this regard, as it re-examines the way quality assurance is carried out in practice, eventually asking the question: could we or should we be doing something differently?

2.2 IMPORTANT DEFINITIONS

Because of the inherently convoluted structure of factors in a discussion of quality assurance in education, it is particularly important to clearly define the terms used. The following definitions are commonly accepted and should be a useful point of reference for this thesis.

2.2.1 Education and Training Providers

In terms of the repealed SAQA Act, No 58 of 1995, a provider was defined as “a body which delivers learning programmes which culminate in specified National Qualification Framework standards and/or qualifications, and manages the assessment thereof” (South Africa. Office of the President, 1995: section 5 (1)(a)(ii)). It is very specific as to what the role

of the provider is. The Skills Development Act, No 97 of 1998 (South Africa. Office of the President, 1998: section 1), defines an occupational qualification as “a qualification associated with a trade, occupation or profession resulting from work-based learning and consisting of knowledge unit standards, practical unit standards and work experience unit standards”.

2.2.1 Quality

Vlăsceanu, Grünberg and Pârlea (2007: 71) define quality as fitness for purpose and conformity to generally accepted standards, for example those defined by an accreditation or quality assurance body, which will ensure the efficiency of the processes used in the institution or programme to fulfil the organisation’s vision and mission. This is variously labelled the “value-added approach” or “quality as transformation” approach, and is strongly student-centred. Quality is considered a transformational process whereby a provider aims at achieving the goal of providing students with specific skills, knowledge, and attitudes that enable them to live and work effectively in a modern society, proof of which is the certificate issued on completion of the qualification.

Quality education would meet agreed standards, usually determined by the regulatory authorities. This arises out of the term “fitness for purpose” but as Harvey (2012) states “In... education it is debatable whether quality evaluations assess fitness for purpose against institutional specifications of purpose (as is intended by the notion of fitness for purpose) or against trans-institutional norms (that allow a degree of comparison across the sector)”.

2.2.2 Quality Assurance

Quality assurance is the means by which a provider can convince its various stakeholders that the standards and quality of its educational provision are being maintained and enhanced. According to SAQA (2001: 6), this means “the sum of activities that assure the quality of products and services at the time of production or delivery”. In a business sense, quality assurance procedures are usually applied to the activities and products associated directly with the goods and services provided to external customers. In this case, the “goods and services” refer to education.

2.2.3 Quality Control

Quality control comprises the procedures (both formal and informal) used by institutions in order to monitor quality and standards to a satisfactory standard. This is sometimes referred to as verification. Quality control is undertaken for internal purposes by the person(s) who make the product (or deliver the service) (SAQA, 2001a: 6).

2.2.4 Quality Enhancement

Quality enhancement is the process of ensuring continuous improvement in the quality of the provision of education and training. This could be called “kaizen” or the “constant search for improvement” (Sayer & Williams, 2012: 54). It is usually developmental in nature, because it assumes that no organisation can ever achieve 100% perfection, thus always leaving room for improvement.

2.2.5 Quality Assessment

Quality assessment is closely linked to quality control. It is the process of external evaluation of the quality of educational provision undertaken by an external body (usually a regulatory body), and focuses especially on the student experience. It would be carried out in this case by an education and training quality assurer (ETQA).

2.2.6 Quality Audit

SAQA (2001: 6) defines a quality audit as “activities undertaken to measure the quality of products or services that have already been made or delivered” but states that “in itself a quality audit has no impact on quality”.

2.2.7 Standards

Standards describe levels of attainment (benchmarks) against which performance may be measured. “Attainment of a standard usually implies a measure of fitness for a defined purpose” (Irish Universities Quality Board, n.d.: n.p.)

2.2.8 Quality Culture

Quality culture is the “creation of a high level of internal institutional quality assessment mechanisms and the ongoing implementation of the results” (Dahlgaard, Kristensen & Kanji,

2002: 235). Quality culture should be a way of life within an institution where every activity is aimed at excellence.

2.2.9 Accreditation

Accreditation is the result of a review of a provider in terms of certain pre-determined quality standards. It is the formal recognition by a regulatory body that the provider meets these standards, and is normally the result of an external audit of the institution.

2.2.10 Value for Money

This refers to quality judged against monetary cost and is seen by stakeholders in terms of return on investment (Newton, 2007: 15).

2.2.11 Quality Management Systems (QMS)

A QMS is the system set up by a provider to ensure that it achieves the quality it claims to offer. A QMS describes the activities an organisation uses to provide good service that meet and exceed the needs and expectations of its stakeholders, more cost effectively and cost efficiently (SAQA, 2001a: 6). It is a combination of the provider's policies and the following of accompanying procedures to ensure compliance with policies. It includes the provider's information system, used particularly to verify student achievements.

2.3 ORGANISATIONS INVOLVED IN QUALITY ASSURANCE

The following concepts also require basic explanation. These are the definitions provided by the National Qualifications Framework (n.d.).

Public higher education providers	Institutions that have been established and funded by the state through the Department of Higher Education and Training (DHET). Public providers can be referred to as universities, universities of technology and comprehensive universities.
Private providers	Institutions owned by private organisations or individuals. Although many of them offer the same qualifications as public providers, private provider institutions are mainly privately funded or sponsored and are generally not subsidised by the state.
Quality Councils	QCs are sector-based structures responsible for the development and quality assurance of qualifications on the NQF. There are three QCs for

(QC)	<p>the three main sectors namely general and further education and training, higher education, and the trades and occupations sector.</p> <ul style="list-style-type: none"> • Umalusi is the QC for General and Further Education and Training and encompasses schools and FET colleges • The Council on Higher Education (CHE) is the QC for Higher Education and concerns itself with universities and universities of technology. • The Quality Council for Trades and Occupations (QCTO) is the QC for occupations and deals with workplace learning and skills development such as learnership programmes.
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2.4 THEORY OF SOCIAL CHANGE

Quality assurance in education arises out of the theories of development and social change which allow us to “build and enhance the thinking of everyone involved in processes of development, as individuals, as communities and organisations” (Reeler, 2007: 6). Greenfield (2009: 401, 404) posits that social change and human development are inextricably linked, and follow a constant and predictable developmental trajectory that starts within a certain sociodemographic context, and leads to cultural changes and learning, the result of which is human development. Eguren (2011: 4) disagrees, saying that change is anything but simple, linear or straightforward.

According to Leat (2005: 4), factors in societal change may be summarised under three main headings: economic, political and cultural. The focus in this thesis is on political change where government plays a very large role in social life and change in its efforts to bring about a transformation within the South African society from the apartheid regime with its entrenched inequities to a democratic society where equity is a core value. In bringing about such social change, there is inevitably “disagreement, contestation, deliberation, negotiation and change over time” (Tully, 1999: 170) with regard to what should be done and how to bring it about.

Political will is verbalised within legislation, policy documents and regulations, included in the national budget, and then implemented. Part of the process is the monitoring of progress to achieve the planned results and, at the end, to evaluate the ‘project’ for accountability and impact. Campbell (2011: 6) calls this “planned social change”.

Campbell (2011: 6) and Leat (2005: 7) agree that this theory of planned social change is a rational model which implicitly assumes that:

- Interventions themselves introduce the change stimulus, set in place important processes, and are the mechanisms that can actually deliver development;
- Problems or needs are clearly identifiable or obvious to the policy maker who makes certain assumptions, arising out of cause and effect analysis. Solutions to the problems are then posed as desired outcomes;
- Participatory processes in the planning phase can get all stakeholders on board, paving the way for ownership and sustainability;
- Unpredictable factors, whether endogenous or exogenous, are simply inconveniences to be dealt with as and when they arise; and
- Desired outcomes or results can be detailed in action plans and budgets and pursued in a logical and linear way.

To put it into context, quality assurance has become a major project of government which, through its educational policy, has devised a set of solutions and purposes or outcomes, together with a series of connected activities for addressing the needs and achieving the transformative change that is desired. However, institutions are not static, neatly packaged homogenous organisms that can all be similarly tailored to a predetermined paradigm. Indeed, “creative new forms of organisation and practice” are constantly “emerging and shifting or challenging power relationships in new ways” (Reeler, 2007: 33). Institutions grow, expand, and become differentiated through endogenous developments that often unfold incrementally (Mahoney & Thelen, n.d.: 2) at the same time as exogenous (sometimes dramatic) developments take place, such as new legislation or policies that are imposed from the outside. For example, a private provider may start a training business and operate informally for a while until it becomes more established through endogenous developments. It then finds itself in a place where change is needed and the exogenous forces come into play, compelling it to come within the ambit of the quality assurance system that has been established by the regulators.

Mahoney and Thelen (n.d.: 4) describe this as a “power-distributional approach to institutions”, which needs to be supplemented with rigid attention to issues of compliance. However, they argue that problems of rule interpretation and enforcement open up space for participants in the process to implement rules in new ways, which results in further institutional change.

This thesis will show that there is a division in South Africa today between policy-makers in education (and their theorising about what an ideal society should look like) and practitioners who have to implement the policies. This leads to a dysfunctional system, in which regulators and practitioners find themselves at odds with one another. There is, therefore, a need to analyse and extricate from the plethora of conflicted and diverse opinions, the things that really matter, so that we can focus on the real work we need to be doing, in this case the education, training and development of people within a society that requires rapid and radical transformation. The conceptual framework discussed in the next section attempts to bring some focus and clarity to these important issues.

2.5 CONCEPTUAL FRAMEWORK OF QUALITY ASSURANCE MANAGEMENT

The Octet of Quality in Higher Education: Framework for Quality (Zaki, 2008: 468) is the conceptual framework chosen to frame the discussion in this chapter. However, it is not the complete picture as it focuses on a micro-level of quality assurance and only on higher education. The micro-level of quality assurance refers to the internal environment of the provider and the elements over which the provider has control and autonomy. I have expanded and modified Zaki's model (below, Figure 2.1), which shows that quality in education is influenced by the elements in the outer circle (the so-called "macro-environment"), all of which have an impact on the "micro-elements" which form the focus of quality assurance in education according to Zaki's (2008: 468) model.

The following paragraphs explore these concepts in order to gain an in-depth understanding of what they mean. The micro-elements or concepts in the inner circle of Fig. 2.1 are explored first. The macro-elements in the outer circle form the subject of the literature review in Chapter 3.

In each case, I examine the topic in a generic sense and highlight the discussion by providing examples from the South African education arena (both public and private) to provide the necessary context. The discussion is tinged by some difficulty, in some cases, in that the available examples come from private further education, and in others, private higher education. Further Education and Training provides for students who leave school at the end of Grade 9 or the age of 15, and is usually focused on training in vocational skills, while Higher Education is offered at a post-matriculation level once a student has completed 12 years of formal schooling and can consist of academic tuition such as a university programme, or a professional course of study which will usually combine theory with practice.

Figure 2.1: Micro- and macro-elements of quality assurance in education



(Source: adapted from Zaki, 2008: 486)

There is little material available that examines both FET and HET bands simultaneously, mainly due to the rather narrow focus of the regulatory bodies. For example, research from the Council on Higher Education (CHE) focuses on tertiary education while research from Umalusi focuses on further education. The Department of Higher Education and Training (DHET) also tends to commission research that focuses either on higher education or on further education without dealing with these as a continuum. This complicates the detection of general trends and principles in private provision of education.

2.6 THE MICRO-ELEMENTS OF QUALITY ASSURANCE

Here, we examine elements defined as the “micro-elements” of quality assurance, while chapter 3 examines the macro-elements of the environment in which private providers operate. This was done in an effort to understand what is really meant by quality in education. Farrington (2005: 53) states that “we are not sure of what we *mean* by quality in... education”. Oduro, Dachi, and Fertig (2008: 3) add that the very concept of quality is an elusive one.

Normally used in manufacturing industries, quality assurance and quality management are invoked to ensure that the products they make are up to standard. Within education, by comparison, quality assurance is generally concerned with achievements of learners at exit or qualification points, i.e. when they have completed their studies. This is, however, a somewhat simplistic explanation.

In SAQA’s implementation of a total quality system for the NQF, quality assurance, quality management and accreditation are not things or products; rather they are a continuous process (SAQA, 2000: 10). In quality terms, the quality process should include all of the following critical aspects:

- The outcomes: awards, achievement of standards or qualifications and accreditation. The quality of the product or outcome was previously the primary responsibility of National Standard Bodies (NSBs) and their Standards Generating Bodies (SGBs) when SAQA was first established but these no longer exist. They were disbanded in 2005 and replaced by Consultative Panels (FASSET, 2010: 23) which now operate under the auspices of the three quality councils established in terms of the NQF Act, 2008.
- The inputs: what the provider supplies in terms of programmes, learning and learner resources. The quality of inputs and processes is the primary responsibility of Education and Training Quality Assurance bodies (ETQAs) and providers of learning.
- The process: the quality of the learning and assessment interactions; and the quality of the monitoring and auditing interactions.

2.7 A STAKEHOLDER MODEL OF EDUCATION

Chapter 1 asserts that the private provider is an important stakeholder in the educational environment (National Planning Commission, 2011: 268; Blom, 2011: 56). It is therefore essential to define a stakeholder model of education to assist in finding a new paradigm for quality assurance, which is one of the objectives of this thesis. It is also a key concept in

understanding the relationship between the private provider and the regulatory authorities within the context of the quality assurance regime.

Stakeholder theory rests upon the premise that businesses need to pay attention to their stakeholders. It is an approach to organisational management and governance that includes a consideration, when making decisions, of organisational stakeholders, such as government departments, funders, companies, colleges and universities (Phillips, Freeman, & Wicks, 2003: 480).

In terms of this theory, the following considerations are relevant:

- who the stakeholders are;
- how they can be identified; and
- the relative importance of stakeholders.

Hitt, Freeman and Harrison (2001: 198) define a stakeholder in broad terms as “any group or individual who can affect or is affected by the achievement of an organisation’s purpose”. Roome and Wijen (2006: 2) state that this should rather be defined as “individuals or groups who significantly affect an organisation’s behaviour”. Irrespective of one’s perspective on this issue, stakeholders are individuals or institutions who stand to gain or lose from the success or failure of a system, and include everyone who affects and is affected by policies, decisions or actions within that system (Freeman, *et al.*, 2010: 26). It is therefore important that organisations undertake a stakeholder analysis to provide a framework against which they can identify, evaluate, and incorporate stakeholder interests into their decision-making processes (Freeman, *et al.*, 2010: 33).

2.7.1 The Importance of Stakeholder Theory

The King III Report on Corporate Governance (otherwise known as King III) (IODSA, 2009: 93) states that the board of a company should ensure that a company code of ethics is developed, stipulating the ethical values or standards as well as more specific guidelines guiding the company in its internal and external stakeholders. Since all private providers are obliged by the Department of Education to be incorporated in terms of either the Companies Act, 2008 or the Close Corporations Act, 1984, they should comply with this requirement.

This would apply to state-owned companies (SOCs) as well, since they are also incorporated in terms of the Companies Act, 2008. A further nuance is added by appreciating that the standard of behaviour of employees in government departments is regulated by the Executive

Members' Ethics Act, No 28 of 1998 (Public Service Commission, 1998) and the Code of Conduct for Public Servants in National and Provincial Departments (Chapter 2 of Public Service Regulations, 2001, as amended) (Department of Public Service and Administration, 2001). In terms of this Code, employees in state departments or SOCs must adopt a customer-service approach in dealing with the public, thereby providing the best service possible in an equitable and impartial manner.

It seems, however, that the legislation is not finding an outworking in the public sector. There remain many calls for good governance in state departments, arguably a reaction to the plague of corruption that has been evident in government for many years (Ferreira, 2010, n.p.). The survey conducted as part of this research investigates compliance with the Code of Conduct. It is clearly a key stakeholder issue in the context of this thesis.

However, stakeholder theory is more than a mere call for organisational ethics. Freeman (1984: 31) maintains that attention to stakeholders is essential to effective strategic management in an increasingly complex world characterised by a multiplicity of groups and individuals interacting in the organisational milieu. Stakeholder analysis identifies and assesses the importance of key persons, peoples, or institutions (Varvaskovszky & Brugha, 2000: 338). Gross and Godwin (2005: n.p.) concur that stakeholder analysis creates a framework for the identification, evaluation, and incorporation of the various stakeholders' interests into organisational decision-making processes, which they regard as crucial to organisational success.

According to Jita (2006: 924), the processes of stakeholder participation in the higher education quality assurance system have proven to be problematic with more of an authoritarian approach from the authorities as opposed to a true dialogue, which results in mutual satisfaction or compromise. I would like to add that this does not apply only to higher education but to all levels of education. Although the notion of stakeholder engagement is well reported in business literature, it has not yet been fully realised in the field of education (Meyer & Bushney, 2008: 1230). In the next few paragraphs, I contribute my views to this debate.

Ideally, educational institutions should pay greater attention to the ultimate consumer of their products. For example, a law school would consider the ultimate consumer of legal services such as defendants or victims of crime, in addition to the law firm itself, and a medical school would consider the patients in addition to the clinics and hospitals where the doctors would serve (Gross & Godwin, 2005: n.p.).

Table 2.1 below gives a brief breakdown of various theorists' stakeholder classifications.

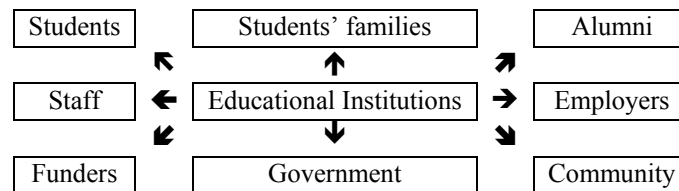
Table 2.1: Classification of stakeholders

Category	Markiewicz (2005: 14)	Maignan, Ferrell and Ferrell (2005: 959)	Hawkins (n.d.: 2)	Phillips (2003: 10)	Application – identification of stakeholders in education
1	Policy makers and senior management staff	Internal stakeholders include functional departments, employees, boards of directors, and managers	Key stakeholders are considered to have significant influence on the success of a project. They can also be classified as active stakeholders as they affect and determine a decision or action in the system.	Phillips does not include this in his definition	Government regulators, faculty/academic staff, and administrators; and school governing bodies, the educator unions, and non-governmental organisations (NGO’s) (Dlamini, 2004: 1)
2	Practitioners or community members who operationalise the strategies, plans and programmes	External stakeholders include interest groups, consumers, competitors, advertising agencies, and regulators	Secondary stakeholders are those who perform as intermediaries within a project.	Derivative stakeholders, which are other groups and individuals who warrant attention on the basis of their ability to affect the organisation	The entities – both public and private – that will be employing their graduating students, or funding their institutions (taxpayers, investors, the government) (Dalrymple, 2007: 1)
3	Service users or clients and their representatives.	The authors do not include this in their definition	Primary stakeholders are the intended beneficiaries of the project. Could also be classified as passive stakeholders as they are most affected by decisions or actions of others.	Normative stakeholders to whom a moral obligation is due	Students, alumni, the parent body, and the local community

Key: Category 1 – policy makers; Category 2 – policy implementers; Category 3 – beneficiaries

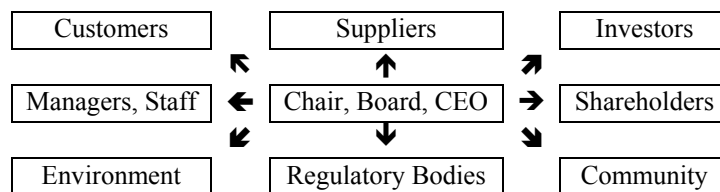
The following figures have been derived from this discussion. Figure 2.2 depicts a simple education stakeholder model, with the institution at the centre, and its key stakeholders in the outer cells of the figure:

Figure 2.2: Education stakeholder model (1)



By contrast, a business stakeholder model, which would presumably be used by a private provider in its task of developing a business strategy could be depicted as follows:

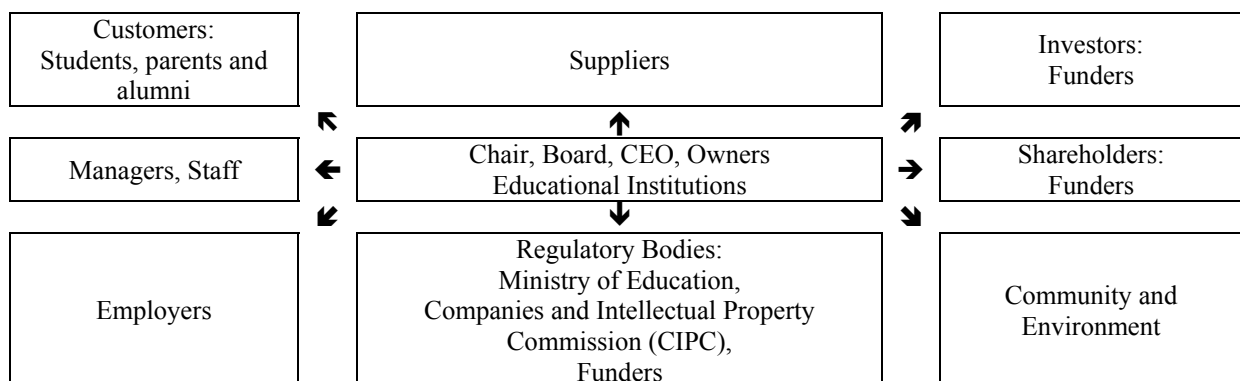
Figure 2.3: Business stakeholder model



(Source Marshall, 2004: 10)

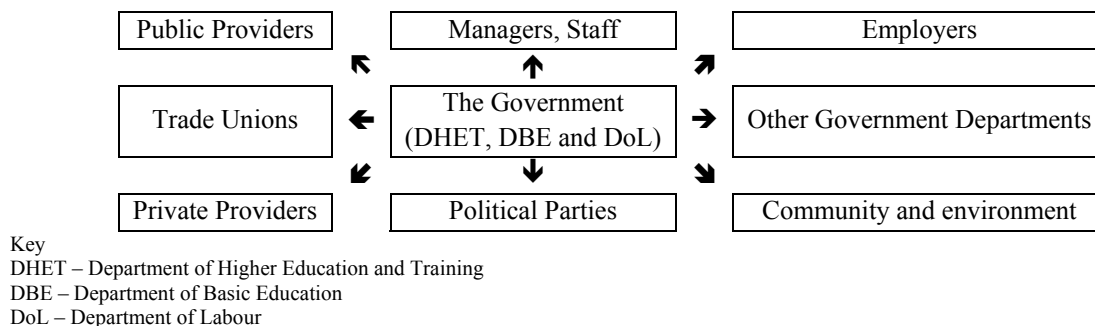
The first model is a simple generic stakeholder model of all tuition providers, both public and private, while the second focuses on stakeholders from a business perspective. Superimposing one upon the other (Figure 2.4) provides a clearer picture of who the stakeholders in private education are, at least from the tuition provider’s perspective. It is interesting to note that the regulatory bodies are but one of several stakeholders for the private provider.

Figure 2.4: Combined education/business stakeholder model



However, it would appear that the dominant stakeholder model that actually prevails in education in South Africa, is as follows:

Figure 2.5: Educational stakeholder model (2)



We therefore conclude that government departments take centre stage within the educational stakeholder model and private providers as a stakeholder group constitute only one of the many competing voices. Indeed when one considers that, in terms of the Skills Development Act that established the National Skills Authority, the stakeholders identified as organised labour, business, government, community organisations and education and training providers (DHET, 2012a: 81) are supposed to reach some form of consensus on key areas of policy, it is clear that this model is accurate. One might well assume that “key areas of policy” include accreditation and quality assurance policies. However, Ramnundlall (2006: n.p.), the stakeholder representative of private providers during the development of the National Skills Development Strategy II in the NSA forum, noted that private providers have been marginalised in terms of the strategy.

Several comments in recent studies such as “this part [*referring to private providers*] of the higher education sector is not sufficiently understood” (CHE, 2009a: 1) or that “FET private providers as a sector have not been intensively researched, either qualitatively or quantitatively” (Umalusi, 2008: 2), make it clear that they have not featured significantly in the stakeholder analysis of regulatory bodies. This may, however, be changing since DHET (2012: ix) has called for comment on the Green Paper on Post-school Education and Training from “formal stakeholders” (not clearly defined in the paper) within the education and training sector, as well as organised labour and organised business, NGOs, and private individuals. The National Planning Commission (2011: 280) has also called for political consensus between various stakeholders (from political parties, professional bodies,

community organisations, labour, industry) on what is needed if the educational crisis in South Africa is to be resolved and the targets that have been set for 2030 are to be reached.

2.7.1.1 Influence of the stakeholders

The next step in stakeholder analysis is to determine the influence of various stakeholders. Hawkins (n.d.: 3) states that it is sometimes helpful to consider stakeholders in terms of their importance and influence, or salience (Buysse & Verbeke, 2003: 458).

- Important stakeholders are those whose needs are crucial to the success of a project.
- Influential stakeholders are those who have the power to control decisions or who can use their influence on others in the decision making process.

Ferrell and Ferrell (2008: 25) state that in assessing stakeholder influence, the three essential factors to consider are their power, legitimacy and the urgency of the issues, pointing out that importance and influence are not the same. For example, learners might have been identified as an important stakeholder in education, but they may have little influence in decision-making processes. However, they have a legitimate place in the stakeholder group of a tuition provider because they are the people most immediately impacted by what the tuition provider offers. Gross and Godwin (2005: n.p.) propose a quadrant on which the stakeholders can be plotted. In my opinion, it would currently look something like this:

Figure 2.6: Education stakeholder analysis

Interest	High	Community Investors Customers Staff	Government CEO/Board/Owners Regulatory bodies
	Low	Shareholders Suppliers Employers Alumni	
		Low	High

Influence/Power

(Source: adapted from Gross & Godwin, 2005)

An issue to consider is whether some of these stakeholders should actually be in different quadrants. For example, should employers not be in a position of high influence and high interest or at least in the high influence quadrant given their critical position as sponsors of the students who will be the products of the education system? In an efficient system, employers would have a greater measure of influence over what a tuition provider teaches, as

it is assumed that they would know best what skills, knowledge and competencies such learners should have in order to succeed in the workplace. If they were in the high-influence quadrant, this would probably have an impact on decision-making of other stakeholders in the high interest/high influence quadrant. An interesting point about this figure is that none of the stakeholders appears to fit into the low interest/high influence quadrant.

The HEQC (2006: 13) takes another perspective on stakeholder consultation. They state “historically, there has been consensus on the virtue of having a body, such as CHE, composed of persons with special knowledge of and experience in higher education and higher education-related matters, who are nominated by a public process, rather than a body of delegates or representatives of stakeholders”. At the same time, they admit (*ibid.*) that “representatives of, and participants from, national stakeholder organisations and individual HEIs contribute extensively to the work of some of the committees and activities of the CHE”. However, the role that CHE publicly promotes through its practice that it is not a conduit for the views of stakeholders, who should communicate directly with the Minister. This does not suggest that they take no account of the stakeholders of higher education; however, it does seem that they remove themselves from direct consultation and collaboration on quality assurance matters. They acknowledge that this may lead to disagreements and even conflict with stakeholders, including DHET, but state (*ibid.*: 15) that this is unavoidable if the independence of CHE is to be kept sacrosanct. Luckett (2006: n.p.) maintains that stakeholder consultations with HEQC (the quality council of CHE) have proved to be only partially successful with “serious differences still existing between the HEQC and some stakeholder groups”. This almost elitist attitude on the part of CHE does not bode well for private providers.

The problem seems to apply to FET providers as well. For example, Burroughs and Sibanda (2010: n.p.) refer to Umalusi’s consultations with the “most relevant stakeholders” implying that some stakeholders would not be consulted on the mandate of Umalusi as a Quality Council. Discussion of this issue substantiates some aspects raised in the introductory chapter of this thesis, and points to a need for deeper investigation.

A key question to ask with regard to stakeholder consultation is whether it is necessary, desirable, or even practicable to consult with all stakeholders, or should one be selective? What implications does this have for the organisation or its stakeholders? The issue of importance and influence as discussed above comes into play.

Another perspective is that best practice in corporate governance demands proper consideration of the legitimate interests and expectations of all the company's stakeholders (IODSA, 2009: 13), and it is recommended that companies provide an integrated report including an explanation of stakeholder engagement. The King III Report says that ultimately an organisation is accountable to its stakeholders for how it conducts its affairs. In the stakeholder models presented earlier, it is clear that there are a number of different stakeholders in education – if educational institutions were to comply fully with corporate governance principles, each of those stakeholders would need to be taken into consideration, and the institution should report on how it has done so.

According to Stein (2011: 10), the King III Report's enlightened shareholder value model, puts the interests of shareholders first, but holds that in the long term due consideration should be given to the interests of all other stakeholders, including employees, suppliers, creditors, the environment and the community at large. The King II Report (IODSA, 2002: 14) introduced the 'triple bottom line' concept, implying that it is good business for companies to be good corporate citizens and to consider social and environmental issues in addition to economic interests. The King III Report (IODSA, 2009: 13) recommends that companies in their own best interest should strive to achieve the correct balance between their various stakeholders. This gives credence to the issue discussed above, that not all stakeholders have the same influence and not all stakeholders can be considered all the time – the key word being balance (Freeman, Harrison & Wicks, 2007: 52). This would oppose a "pluralist, multi-stakeholder model which sets the interests of stakeholders as an 'end in themselves', requiring a company to continuously balance the interests of all its stakeholders and to prefer the interests of one stakeholder above those of another only where it is in the best interests of the general body of stakeholders to do so" (Stein, 2011: 9).

Edmunds and Wollenberg (2001: 232) state that "many approaches to multi-stakeholder negotiations mask abuses of power and structural, enduring inequity". They also posit that the level of consensus reported from these negotiations tends to be exaggerated and say that disadvantaged groups are thus exposed to manipulation and control by more powerful stakeholders. Teddlie and Tashakkori (2009: 93) identify these groups as "oppressed groups". To my knowledge, from personal observation, most education stakeholder forums are convened by the Department of Higher Education and its various related bodies such as SAQA, QCTO, and the SETAs after a draft policy or document has been published for comment. Although they ask for stakeholder input, it seems that little, if any, of that input is

taken into account in final policies, or that only minor changes are made. An example is the National Skills Development Roadshow held in the various provinces by the Minister of Higher Education and Training in November, 2011, which was by invitation only. From a personal discussion with Carlsson (2011), it appears that none of the professional bodies (a key stakeholder in education) were invited to the roadshow. After such meetings there seems to be little accountability to those stakeholders, with brief mentions being made of this in Annual Reports, for example, the 2006 Annual Report of CHE (2006: 14). This would appear to confirm Edmunds and Wollenberg's research.

At the same time, Fielden and Varghese (2009: 82) state that there are several barriers in getting stakeholders (especially PHEIs) to participate in discussions with the regulatory authorities or each other for a number of reasons such as intense competitiveness in the market. This may contribute to the stated lack of understanding of the private provider by the regulatory authorities.

2.7.1.2 Stakeholder expectations

Each stakeholder has a different idea of what proper quality is and each expects something different from the educational institution or tuition provider. The literature on this is sparse, pointing to a need for investigation. It was consequently included in the research questionnaire.

A brief eclectic list of stakeholder expectations is provided below (bearing in mind that the focus of the research is on quality assurance):

- Employers' expectations of tuition providers (Newton, 2007: 7) are that they will support learners prior to, and during the placement, specifically orienting students to the professional work place prior to the commencement date.
- Today students are seen increasingly as consumers of a service. No longer can HE institutions use a supplier-driven approach that says 'here is what we offer: take-it-or-leave-it' which many have followed in the past (Tricker, n.d.: 2). Students expect private tuition providers to provide a value-for-money, professional, high quality and supportive learning environment that will prepare them for their careers (Tricker, 2005: 111).
- Regulatory authorities (CHE, 2004a: 7) expect providers to have a range of strategies in place and to be able to prove effective implementation of these strategies for delivering

and supporting quality teaching and learning. This is an aspect that is dealt with in depth later in this chapter.

- There is little evidence of any research into tuition providers' expectations in terms of quality assurance. Most of the literature deals with what tuition providers expect from their students, a knowledge gap which this research hopes to address. The researcher is of the opinion that without such understanding, quality assurance frameworks are flawed and, as mentioned in Chapter 1, onerous in terms of their ambit and implementation.

Other key issues relating to stakeholder expectations are:

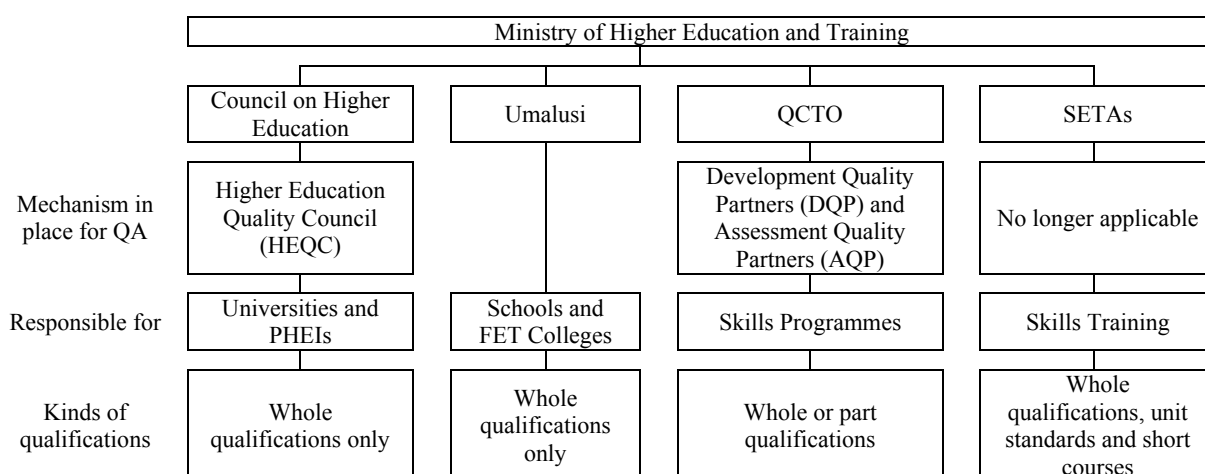
- whether these expectations are realistic; and
- whether they can be harmonised to meet all stakeholders' expectations.

The brief foray into stakeholder issues has already begun to point to some problematic issues such as a lack of consultation, “oppression” and a difference in interpretation of what the various stakeholders want.

2.8 REGULATORY AUTHORITIES

Figure 2.7 is a clarification of the quality assurance system and the role of the various educational stakeholders. It will form the basis of the discussion below.

Figure 2.7: Hierarchy of quality assurance in South Africa



The vision of the Department of Education (2003: 5) is “a South Africa in which all our people have access to lifelong education and training opportunities, which will in turn contribute towards improving quality of life and building a peaceful, prosperous and democratic society”. In fulfilling this vision, the Department’s mission is “to provide

leadership in the construction of a South African education and training system for the 21st century” (*ibid.*). Its mandate to ensure that its vision and mission are achieved, is “the building of a rational, seamless higher education system that grasps the intellectual and professional challenges facing South Africans in the 21st century, and meets the learning needs of individuals and the development needs of our society and economy” (*ibid.*). This necessitates, among other things, “the promotion of quality teaching and research, not only in public universities and technikons, but also in privately established institutions of [...] learning” (*ibid.*). Thus, it is that quality assurance structures have been established – namely CHE, Umalusi and QCTO – to implement the mandate and ensure quality provision of education.

These ideals are not currently finding their outworking in practice. The educational environment is characterised by inefficiency, poor pass rates, lack of articulation between post-school institutions particularly at tertiary level, and problematic access to public tertiary institutions due to expanding demand and lack of the state’s capacity to meet that demand. These problems are acknowledged by the Department of Higher Education and Training (2012: xi).

2.8.1 Sectoral Education and Training Authorities (SETAs)

SETAs were established in terms of the Skills Development Act, 1998, (SDA) to manage the many skills development needs of the country. There are 21 SETAs (SAQA, 2011a: n.p.) covering both the public and private sectors (see Appendix A). Each SETA coordinates skills development in its particular sector, constituting economic activities that are linked and related; for example, the banking sector, the information technology sector, the manufacturing sector, the education sector and the agricultural sector, to name a few.

Until 2008, the SETAs had the responsibility for quality assurance but, despite the NQF Act of 2008 releasing them from this function, arrangements to date (2012) have not been implemented to take over the quality assurance role, particularly because the QCTO is still finding its feet. Although SETAs are no longer mandated to carry out quality assurance, they nevertheless still play an important role in the delivery of education and training.

Since April, 2011, all SETAs have a standard constitution (Nzimande, 2011: n.p.) with a ministerially-appointed Chair, as well as two other ministerial appointees on the Board. In

terms of the SDA, Section 11, a SETA may consist only of members representing organised labour, organised employers, professional bodies and government departments.

Nzimande (2011: n.p.) stated that “in the 11 years of their existence the SETAs have become known among the general public more for the problems in their governance and management than for what they were established for, which is skills development”. He continued that “we have 21 skills development systems. Every SETA has operated as an independent entity, with its own systems, policies, constitution, model of skills development and training delivery, and utilisation of funding,” sometimes with very little regard for the proper spending of public money. These remarks by the Minister are indicative of the complexity and confusion that exists within the quality assurance regime in South Africa.

Although the SETAs are no longer responsible for quality assurance, consideration of their role is vital to the success of this research, since most of the private providers who are the focus of this work are registered with the SETAs, and it is presumed that they will transition to being registered with one of three Quality Councils as time progresses. In fact, some providers are already registered with CHE and Umalusi as required if they offer whole qualifications. This is not a requirement if they offer part qualifications or unit standards training. In such instances they need only to be quality assured by a SETA. The Draft Learning Programme Regulations (DHET, 2012c: 4) propose that these providers be called “skills development providers” and they will have to be quality assured by the QCTO. At the present time, the QCTO has devolved quality assurance back to the SETAs since it does not have capacity or resources to carry this out.

2.8.2 Umalusi²

In 2001, Umalusi, the Council for Quality Assurance in General and Further Education and Training (GENFETQA), was founded by parliament in the General and Further Education and Training Quality Assurance Act, 2001 (Act 58 of 2001). It was thereby mandated as the quality assurance body for Levels 1 – 4 of the National Qualifications Framework (Umalusi, 2008: 23). Level 1 refers to compulsory schooling and Adult Basic Education and Training (ABET), while Levels 2 – 4 fall into the category of post-school education and training (more traditionally called secondary education). Umalusi’s responsibility is to assure the quality of programmes, assessments and provision in schools, FET colleges and ABET centres, as provided for in terms of:

- the South African Schools Act, 1996 (Act 84 of 1996);

² Umalusi means “shepherd”. The acronym GENFETQA is seldom used when referring to this regulatory body.

- Further Education & Training Colleges Act, 2006 (Act 16 of 2006 as amended 2010); and
- Adult Basic Education & Training Act, 2000 (Act 52 of 2000 as amended 2010).

Umalusi is required to collaborate with SAQA and the other Quality Councils (QCs), subject to the National Education Policy Act (No. 27 of 1996), the NQF Act, and its founding Act, namely the GENFETQA Act (No. 58 of 2001).

In 2001, the DoE instituted a pre-registration process for private providers, which required them to register in terms of the Regulations for the Registration of Private FET Institutions (Department of Education, 2003: 6). This meant registering with Umalusi. Subsequently, the Further Education and Training Colleges Act (No. 16 of 2006) specified that private colleges must comply with the requirements of Umalusi. Criteria for registration of providers by Umalusi include financial capacity, maintenance of acceptable, minimum standards (that is, comparable to those at public FET institutions) and compliance with quality assurance procedures as defined by SAQA. Government Notice No. 518 of June 2006, in addition, specified that, with effect from 1 January 2008, no private providers would be allowed to offer further education and training qualifications that were “not aligned with or registered on the NQF” (Department of Education, 2006: 3). Prior to 2012, the exception to this requirement was that providers that exclusively offered short skills programmes were not required to register (*ibid.*) but with the promulgation of the Draft Learning Programme Regulations (DHET, 2012c), this appears to be changing.

Umalusi (2012: n.p.) states that the GENFETQA Act, 2001, makes provision for Umalusi to “assume its functions progressively depending on capacity”. Due to a limited capacity and a large number of providers, Umalusi is prioritising and phasing in its institutional accreditation initiatives. The first phase of this initiative is provisional accreditation status for private provider institutions. It should be noted that as of February 2013, (some 12 years after the promulgation of the Act), Umalusi has now been authorised to grant full accreditation private FET providers (the reasons for withholding this authorisation for so long are unknown). As of December 2012, only 378 private FET providers out of 974 had been given “confirmed candidate” status for one year, which means that they have to comply with the accreditation requirements and undergo annual monitoring. “Confirmed candidate” presumably means provisionally accredited. According to some providers this means full accreditation (MSC College, 2012: n.p.) which is doubtful, and demonstrates the obscurity of the terminology. None of the other QCs use such a term – a provider is either not accredited, provisionally accredited or fully accredited (or possibly even de-accredited or deregistered).

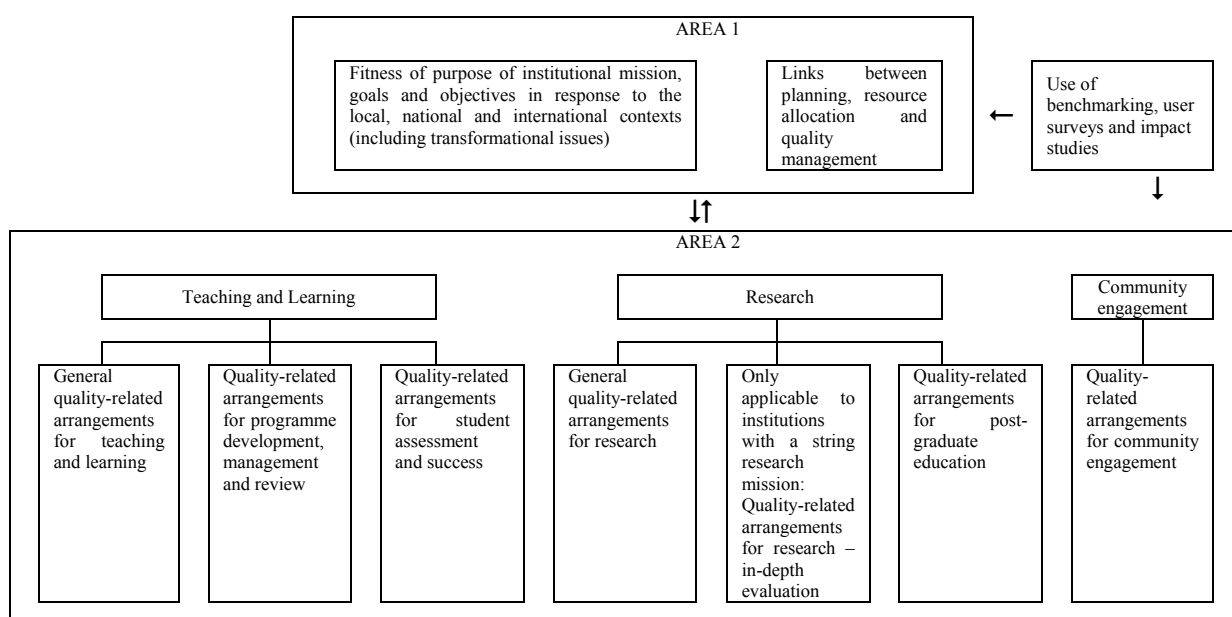
Umalusi focuses on programmes and curricula, external assessment, and sustainability as quality assurance measures.

2.8.3 The Council on Higher Education

In analysing how private provision in South Africa evolved, Mabizela (2002: 4) noted that a rapid and marked growth in private providers of higher education, during the period 1948 – 1990, consistent with international trends, can be attributed to the neglect of private post-secondary education institutions by the government. When the state ultimately realised that this was a burgeoning and uncontrolled phenomenon, the Higher Education Act, No. 101 of 1997, was promulgated to provide the legal framework for the registration of private HEIs and imposed various obligations upon them. The South African Council on Higher Education, commonly known as CHE, was the body established by the Act to manage all higher education issues, and is responsible for quality assurance and promotion through the Higher Education Quality Committee (HEQC) (CHE, 2004a, b). HEQC is CHE's one permanent committee which has executive responsibility for quality promotion and quality assurance in higher education (*ibid.*) via the mechanisms of institutional audits, national reviews, programme accreditation, quality promotion and capacity development. According to CHE (2004a: 4), quality management includes a range of elements of institutional planning and action, more specifically the policies, systems, strategies and resources used by the provider to address issues of quality.

The criteria used by CHE in quality assurance are shown in figure 2.8 below:

Figure 2.8: Scope of HEQC's quality auditing system



(Source: CHE, 2004a: 12)

2.8.4 QCTO

The Quality Council for Trades and Occupations (QCTO) came into existence with the promulgation of the NQF Act, 2008. QCTO's mandate is to ensure that "learning programmes can be developed to address specific scarce and critical skills needs" and it "manages and coordinates the qualifications in the occupational qualifications framework in terms of their development, provision, assessment and impact" (FASSET, 2009: 2).

The QCTO has introduced a revised approach for the design of occupational qualifications on the NQF. Instead of introducing a less complicated and more easily-accessible system for implementing and monitoring skills development and occupational awards (which was the intention), it has only led to greater complexity and confusion. The intention of the NQF Act, 2008, in establishing this 3rd quality council, was to find new ways of approaching the quality assurance of provision of skills training. The model therefore has a number of implications for private providers who deliver part- or whole NQF-registered occupational qualifications. To add yet greater confusion to the debate, DHET (2012: 76) has mooted a possible disbanding of QCTO even before it is fully established. Furthermore, the Minister issued a government gazette in December 2012, putting a temporary halt to any further development of qualifications by the QCTO above NQF Level 6. The gazette required an in-depth investigation by SAQA into this matter, and it appeared that the *status quo* in post-school education and training might be changing yet again.

The mechanisms that the QCTO is in the process of setting up are the establishment of Development Quality Partners (DQP) and Assessment Quality Partners (AQP) (QCTO, 2011a: 1).

- Development Quality Partner means a body appointed by the QCTO to manage the process of developing occupational qualifications, curricula and assessment specifications prior to the registration of qualifications on the National Qualifications Framework.

The process of development is long, unwieldy and costly, requiring an average of 22 days of stakeholder meetings with a QCTO delegated facilitator charging between R450 and R750 per hour (Machard, personal conversation, 10 November 2011), resulting in a development cost to the DQP of approximately R120 000 per qualification.

- Assessment Quality Partner means a body appointed by the QCTO to develop assessment instruments and manage external summative assessment of occupational qualifications.

At the time of writing, the process is not yet fully mapped out, so it is impossible to gauge the time or cost. However, the whole issue of appointment as an AQP is fraught with conflict due to the current existence of a number of assessment bodies, all assessing similar qualifications. A case in point is that of the professional bodies relating to FASSET that assess professional qualifications in the accounting field such as chartered accountants, professional accountants, accounting officers, cost and management accountants, accounting technicians and general accountants. All these qualifications fall under the occupation of “accountant” as listed on the Organising Framework for Occupations (OFO³). Hence, it is problematic to determine which professional body becomes the AQP if QCTO requires only one AQP per occupation. A proposal for resolution of this conundrum was sent to the QCTO by FASSET after consultation with the professional bodies involved (Faustino, email communication, 31 January 2012) in which it was suggested that multiple qualifications should be recognised for a single occupational award such as “Accountant”. Some unworkable and unintended consequences of this model still need to be resolved.

The AQP, once appointed, would then accredit providers to offer the qualifications. Initially, the extraordinarily high costs of the QCTO’s proposed accreditation process elicited strong resistance from providers, and the idea of costs was temporarily shelved to investigate other funding methods (FASSET, 2011: 4).

This model also excludes small private providers from conducting summative assessments as each one would have to become registered as an AQP which must then assess on a national basis for all other providers offering the qualification. It is argued that very few, if any, will have the financial or human resources to do so and will have to link to an AQP for the purpose (probably at great cost to the learner).

2.9 NUMBER AND TYPES OF PROVIDERS

The SETA websites (Blom, 2011: 29) list at time of writing 12534 private training providers. This number fluctuates from time to time as new providers are accredited and as others are

³The OFO is a coded occupational classification system based on the occupation framework of the International Labour Organisation (ILO).

de-accredited. There is conflicting evidence on the actual numbers of private providers. For example, the DTI reports the existence of some 13000 private providers (DTI, 2008: 163), while only 4766 of these were reported to be active (*ibid.*). The DTI uses the Stats SA Integrated Business Register as the source of its information. On the other hand, SAQA (2011b: 27) states that during the 2010/2011 year ending 31 March 2011, 8856 private providers were accredited, adding further confusion to these statistics. Umalusi (2013: n.p.) records 974 private FET providers, and, as of 29 January 2013, there were 87 Private Higher Education Institutions (PHEIs) (SAQA, 2013: n.p). The number fluctuates slightly from time to time. It is not clear whether these numbers are included in the DTI, SAQA and SETA records. Given this confusion and uncertainty, it is not surprising that the quality councils do not understand this sector.

Most of these providers are Small, Medium and Micro Enterprises (SMMEs) and, in fact, fall into the SAQA (2004: 7) classification of survivalist businesses, namely those that do not employ people, do not pay tax, and have an annual turnover of less than R5 million. Many of these providers are highly specialised, appealing to a very specific sector of the market or non-governmental organisations (NGOs) working in rural, underdeveloped geographical areas (DTI, 2008: 163). According to the Department of Trade and Industry (DTI) (2008⁴: xxxii; Blom, 2011: 36), the majority are either micro enterprises or very small enterprises. SAQA (*ibid.*) identifies such organisations as requiring “developmental support” in order for them to reach the minimum quality assurance criteria, but also states that “the cost of gaining accreditation may prove to be unaffordable for the majority of these providers” (SAQA, 2004: 7). It is difficult to understand how these organisations could become accredited because the requirement from the Departments of Education (Higher and Basic) and other regulatory bodies such as Umalusi and the SETAs, is that they must be a company, close corporation or other registered entity.

This situation has remained largely unchanged from 2004 to date (2013), despite SAQA’s identification of the problem. Certainly, with the accreditation fees proposed by QCTO (2011b: 3), it seems that this will continue to be a problem. It can, therefore, be assumed that SMMEs are generally under-resourced in terms of finances and human resources, exposing an urgent need to reconsider the burden of quality assurance requirements. Figure 1.1 (in Chapter 1) places them at the base of the quality assurance pyramid. Both the National

⁴It should be noted, that these are the latest figures available at present.

Planning Commission (2011: 268) and the DHET (2012: 9) recognise that the existing regulatory system is complex and problematic and acknowledge that more effective and enabling legislation is needed.

2.10 POLICIES AND PRACTICES

Policies are guidelines for action within an organisation. In order for them to achieve their purpose, they need to be effective. In the experience of this researcher, the development of policies by providers, especially micro-providers, has frequently proven to be an obstacle to accreditation. Where policies do exist, they are often only so many words on paper produced for the sake of compliance, but the actual implementation of the policy is questionable.

Providers are also expected to abide by policies that have been developed externally such as the policies drafted by the regulatory authorities regarding quality assurance or accreditation.

2.10.1 Effective Policies

Bcorporation.net (n.d.: 3) states that company policies are most effective as official written documents. Policies often differ in form depending on company size, industry, and years in business. Nevertheless, policy documents generally contain certain standard components such as a purpose statement, definitions of key terms, the background to and the reasons for the policy, start, end and review dates, and specific guidelines as to processes and procedures to be followed in implementing the policy. Meador (2012: n.p.) and Bevis and Chudgar (2007: 2) state that in order to be effective, a policy should be informative, direct, clear, concise, current and easy to understand.

An accreditation portfolio must include institutional policies, and in an institutional audit, the auditor will look for evidence of actual implementation of these policies. For example, if a provider states that it has a policy of reviewing facilitators' effectiveness, it might use student feedback forms and performance appraisals as evidence of having implemented the policy. The auditor will also look for evidence of improvement in processes arising out of the provider's internal review of such feedback. The aim is continual improvement to enhance quality delivery.

2.10.2 ETQA Policies

The SAQA (2000: 8) Quality Assurance Policy, which is the foundation stone of the quality assurance policies of all the regulatory authorities responsible for quality assurance of

providers, is constructed around the principles of accountability, relevance and credibility of all the role-players, namely the regulatory authorities, ETQAs, and providers. SAQA (2001: 18) advocates a “holistic, integrated, democratic, process-oriented and flexible approach”. SAQA’s (2000: 9) Quality Assurance Policy criteria for providers includes the following:

- accredited by one ETQA and a shared primary focus i.e., with that ETQA;
- a quality management system;
- ability to develop, deliver and evaluate learning programmes for specified registered standards or qualifications;
- financial, administrative and physical resources;
- policies and practices for staffing;
- learner services;
- assessment management;
- reporting; and
- the ability to achieve desired outcomes using available resources and according to ETQA procedures.

SAQA did not itself carry out quality assurance on providers.

Before 1998, private providers were not required to register, and two voluntary bodies, namely the Association of Private Colleges of SA (APCSA) and the Association of Distance Education Colleges (ADEC) regulated the sector. With the passing of the FET Act, however, private providers were required to register with the former DoE as a precondition for offering FET education and training, as well as either a SETA (which fell under the oversight of the Department of Labour), Umalusi or CHE (both the latter being under the oversight of the DoE). The NQF Act was passed in 2008, and established three quality councils, namely Umalusi, CHE and QCTO. All now fell under the oversight of the DHET, which was formed in 2009. The DHET also took over the responsibility for the SETAs from the DoL. The disbanding of SETAs appeared likely at the time but instead they were restructured. At the time of writing, this is ongoing and it is somewhat unclear what the role and function of the SETAs will be in the future, given that their mandate as quality assurers no longer applies. The Draft Learning Programme Regulations (DHET, 2012c) state that a key role of the SETAs will be the registration of learning programme agreements; presumably, this will entail monitoring those agreements and progress in terms of completion of the underlying

qualifications. This is a really grey area in the quality assurance mix at present but it seems likely that, in the short term, it will merely add to the confusion.

All the ETQAs have quality assurance policies which are made available to providers for implementation. The provider will be evaluated against criteria contained in these policies. Each ETQA has its own interpretation of the policies, and therefore sets out procedures in terms of its own understanding. This leads to the provider having to undergo a minimum of two audits from different bodies, in order to be registered and accredited. On top of this, there are all the follow-up processes relating to the assessment of learners which involve complex assessment, moderation, verification and reporting procedures essential to sustaining the provider's accreditation status.

2.10.3 Provider Policies

SAQA's policy outlined above expects providers to develop for accreditation purposes a policy manual that will define what the provider wishes to achieve. As an integral part of the QMS, the manual provides direction to administrative and academic staff about the provider's strategic objectives and operational plans as well as policy statements on key business processes. In a larger organisation, the policy manual will usually be a separate manual but in a smaller organisation, it may be a section of the entire QMS Manual. Jacobz (2005: 54) states that many private providers have excellent quality management systems and policies.

The NQF Support Link (n.d.: n.p.) cites the MERSETA document as providing a useful summary of the components that should appear in the policy manual of a provider to ensure that quality assurance and management exist. This summary is provided in Table 2.2 on the next few pages. It is also noticeable from the table that the micro-elements of leadership, curriculum, and learner profiles are not included (see Figure 2.1).

Table 2.2: QMS requirements mapped against the micro-elements of quality assurance

QMS Requirements (SAQA)	Micro-element (Zaki)	Component (NQF)	Description (NQF)	Quality check (NQF, SAQA)
Baseline criteria	Institutional design	Vision	This is motivating statement, stating where the organisation wishes to be at some point in the future usually in about five years' time.	<ul style="list-style-type: none"> Their aims are clear
Baseline criteria	Institutional design	Mission Statements	This describes in broad terms the purpose of the organisation.	<ul style="list-style-type: none"> This must be current
Outputs, inputs and processes	Policies and practices	Quality Policy Statement	This specifies the degree of excellence the organisation wishes to achieve. It will normally serve several purposes. Firstly, it will provide a commitment from senior management regarding the level of quality and service it promises to deliver. Secondly, it will commit the staff to the same level of quality and service. In support of the above, it may include the organisation's quality and business objectives.	<ul style="list-style-type: none"> Visible to both the public and staff in prominent positions Institutionalised through effective and dynamic policies and procedures. The objectives must be specific, measurable, achievable, realistic and time based (SMART) Processes are identified; Procedures for quality management policies are in place; They have clear learner-centred policies and ways of dealing with learning programmes;
A quality management continuum	Policies and practices	Company Objectives/Strategic Priorities	In order to achieve the vision the provider has set, long term priorities and shorter-term objectives need to be determined.	<ul style="list-style-type: none"> They are able to conduct off-site or work-site activities; They have clear policies for assessment and its management,; They have policies for programme development in terms of content, people, procedures, practices and resources. Sustainability of quality management strategies are in place.
Outputs, inputs and processes	Resources	Business Plan	A business plan is necessary to guide decision-makers on financial issues. Projected cash flows are a useful tool in this regard.	<ul style="list-style-type: none"> They have the necessary financial, administrative and physical resources to deliver their programmes. They have the ability to develop, deliver and evaluate learning programmes The business plan should be written annually and reviewed every six months.
Outputs, inputs and processes	Resources	Budgets	A budget is often part of a business plan but can be a separate document. Cash flows would apply here as well.	<ul style="list-style-type: none"> It must contain expected income and planned expenditure.
Ongoing improvement, accountability and transparency	Open systems thinking	Marketing Strategy / Plans	All training providers should have a marketing plan or strategy, whether it is an internal provider or a public provider.	<ul style="list-style-type: none"> The writing of policy statements for marketing, customer service and any other processes as determined by the provider are optional but recommended.
Democratic organisation and practice	Institutional Design	Company Organogram	A company organogram should be included, which includes the positions and names of staff filling each position.	<ul style="list-style-type: none"> They have democratic modes of organisation and practice. Defined in the quality management system, and signed by the respective personnel. The organogram should indicate who is responsible for

QMS Requirements (SAQA)	Micro-element (Zaki)	Component (NQF)	Description (NQF)	Quality check (NQF, SAQA)
				controlling the QMS and all its associated documentation? • What are the responsibilities of others in the management of the QMS?
Ongoing improvement, accountability and transparency	Faculty skills and key abilities	Defined Responsibilities	It is important that all staff members are fully aware of their responsibilities.	
A quality management continuum	Policies and practices	Policy Statements on Key Business Processes	Policy statements must be written for all the following Key Business Processes	<ul style="list-style-type: none"> • Physical resources • Human resource processes • Staff recruitment selection • Appraisal • Training and development • Learning programme development and provisioning • Learner entry guidance and support • Financial and administration processes • Management of assessment processes • Management of on-job training (learnerships) • Management review processes • Management of documentation and records • Management review processes • Internal auditing processes

(Source: Zaki, 2008: 486; SAQA, 2001: 18)

Having discussed what good policies should look like and what features of those policies the ETQAs would check, it is important to mention that a policy is only as good as its implementation. Consigning it to a paper-based exercise produced in order to meet the accreditation criteria is a pointless exercise. A provider that is concerned about continuous improvement and enhancement of quality delivery of its services will ensure implementation of its policies, regular review, and adaption as necessary.

2.10.4 What is the Problem?

Generally speaking, the regulatory frameworks in many countries do not provide an enabling operating environment that contributes to growth in private education (Fielden & LaRocque, 2008: 11), although these authors posit that “governments are fully entitled to exercise rigorous checks and controls on those wishing to establish private providers” and that “private entrepreneurs accept this”. They note that education providers that provide quality services welcome effective regulatory frameworks, including Quality Assurance (QA) mechanisms. They provide a guard against poor quality providers who may offer programmes more cheaply than accredited providers, thereby often duping an unsophisticated market into enrolling with them. It is evident that private providers operate in a quality assurance landscape that is multi-layered, ambiguous, complex and ever-changing, engendering a host of different approaches and quality assurance concerns, as discussed below.

Umalusi’s model of quality assurance differs substantially from the overall model adopted by the SETAs which were given six statutory functions involving activities that include the accreditation of providers, the evaluation of learning programmes, the quality assurance of learner achievements (including the award of credits and qualifications), and the registration of constituent assessors. Umalusi has a centralised model, while the SETAs operate on a decentralised model, as mandated by SAQA, that includes individual programme approval, the verification of internal quality management systems of assessment and the use of registered assessors and moderators. This has to a large extent led to a lack of uniformity in how different SETAs apply the quality assurance model originally devised by SAQA.

Recent developments have obscured the issue even more with the call for comments on the draft qualifications frameworks stating that “Umalusi's document anticipates that certain level 5 qualifications will fall within its sub-framework, although Umalusi's scope is currently restricted to levels 1-4 on the NQF. Also, the scope of CHE's revised HEQF proposals seems

to be confined to higher education institutions, whereas certain higher education programmes may be offered in appropriately equipped and staffed FET colleges” (DHET, 2011: 4). The boundaries are thus blurred and it is clear that this leads to a problem of overlapping jurisdiction and duplication of effort for the providers and the regulatory authorities alike.

Umalusi (2008: 6) states that “most of the occupational and sector-specific qualifications with which SETAs are concerned fall in the FET band, and therefore form part of provision by FET private colleges”. However, QCTO which was formed to quality assure occupational qualifications has jurisdiction over all bands of the NQF from levels 1-10, although the DHET (2012e: 6) has disputed that it should quality assure qualifications higher than NQF6.

Although HEQC supports the principle that the responsibility for quality of provision rests primarily with higher education institutions themselves, it uses a centralised model of accreditation, similar to that used by Umalusi. The role of HEQC is thus to provide external validation and verification of the self-evaluation report of the higher education provider, which is submitted as part of its audit portfolio. This portfolio is the basis of the institutional quality audit. An external panel of peers and experts conducts a site visit during which they gather information, which they compare with what is contained in the self-evaluation report. Using HEQC Audit Criteria (see Fig 2.8), the panel then prepares an audit report based on their assessment of the effectiveness of the institutional quality management systems. Audits of all public and qualifying private higher education institutions are conducted once within a six-year audit cycle (CHE, 2012: n.p.)

The QCTO takes a completely different approach, leading to processes that are currently fraught with contention and lack of clarity. Their model is centralised with quality assurance being delegated to assessment quality partners. There is no guarantee that this will lead to uniform application of the standards, and as a consequence, QCTO will inevitably experience problems similar to those of the SETAs.

These differences are inevitable, reflecting the nature of the various providers, learning systems and learning programmes with which the regulatory bodies have primarily been involved. However, in the unfolding of the NQF and its related quality assurance models and agencies, the regulatory terrain for private providers has become very complex, with an “incoherent duplication of accreditation” (Umalusi, 2008: 6) that is expensive and time-consuming to both providers and quality assurance bodies. As Akoojee (2005: 4) points out, “regulation has a dual purpose – to ensure consumer protection as well as to create an

enabling environment for the sector to exist”. While this is true, it seems that the regulatory environment in South Africa has become unacceptably top-heavy. In December 2012, the Minister acknowledged that a “generally stable and predictable policy environment is required” (DHET, 2012e: 2).

Registration as a means of recording the existence of colleges, and tracking issues such as company registration compliance and financial viability, is fairly straightforward. However, the situation becomes more difficult when considering more qualitative procedures linked to quality assurance and accreditation.

There are various reasons for this:

Firstly, the legislation governing quality assurance responsibility causes some confusion. There are at least three Acts that govern various aspects of quality assurance, each with its own requirements.

Secondly, many providers find themselves in the position of offering programmes and qualifications that fall under the authority of Umalusi, SETAs (sometimes more than one), CHE and QCTO – they are so-called multi-purpose providers. This means that there will inevitably be overlaps of jurisdiction and confusion as to which should take priority or be considered more important.

The registration requirements also demand that all FET private providers offering qualifications must be accredited by Umalusi in order to be registered by the DoE (without clarity on precedence) while private providers offering higher education qualifications must be registered with the Registrar of Private Higher Education Institutions (under the jurisdiction of DHET). There have been instances of registration and accreditation not being granted because the regulatory bodies argue about which process must precede the other, leaving the provider stranded in bureaucratic red tape. Colleges must first register as a private higher education institution with the Department of Higher Education and Training (DHET) to have the legal authority to offer higher education programmes. This should take place at least 18 months before starting to offer any programmes (South African Government Services, 2013: n.p.). In my personal conversation with the principal of Rissik Business School, Mrs Michelle Rissik, (2012) stated that she had been trying to register her college for five years, but because the DHET “kept shifting the goalposts”, and asking for her accreditation with the HEQC, she had given up. Fielden and LaRocque (2008: 4) maintain

that “too often, government regulation appears designed to discourage private investment without any commensurate gain in the quality of education”.

Thirdly, because officials in the accrediting body have considerable leeway and discretion in assessing applications for institutional registration, there is inconsistent application of the rules and significant scope for arbitrary (and possibly corrupt) decision-making (Fielden & LaRocque, 2008: 13).

This situation has had various unintended consequences. Technically speaking, the ETQA regulation stating that a provider cannot be accredited by more than one ETQA (SAQA, 2000: 9) contradicts the requirements of other legislation: for example, where the provider must be accredited by the DHET and Umalusi, or the DHET and a SETA; this has caused some confusion in the field. Nevertheless, many providers (sometimes under pressure from clients, or because of funding opportunities such as tenders for grant funding) have applied for, and been given, accreditation with various SETAs. Baumgardt (2011: 5) reports one provider as saying “We've been quality-assured by the ETDP SETA, BANKSETA, INSETA, CHE/HEQC (pending), Umalusi (almost finalised)”. They are thus in the position of having to meet differing accreditation requirements and to go through costly and sometimes confusing procedures for different programmes. According to Umalusi (2008: 6), the mechanism of memoranda of understanding, which was intended to facilitate the relationships between different ETQAs and support effective delivery, has proved almost impossible to implement. In enquiring about this with FASSET, the researcher was advised that there are many attempts at getting such agreements in place, especially with CHE, but these have proved fruitless (Faustino, 2010: personal conversation) with CHE either ignoring requests altogether or refusing them.

By way of explanation, a memorandum of understanding (MOU) is an agreement signed between two ETQAs to establish a working relationship setting out the roles and responsibilities of the two parties for relevant and common issues of concern. An MOU between two ETQAs generally makes provision for coordinated roles and responsibilities for activities of providers in case of overlap. It will predefine the processes, procedures and different roles where a constituent provider operating predominantly in the sector of ETQA “A” might offer a training programme, unit standard, skills programme, or qualifications belonging to the scope of ETQA “B” (CATHSSETA, 2012: n.p.). It is not hard to see the problems that providers face in this kind of environment.

Finally, there are progression issues for many learners exiting private FET providers despite the fact that they have earned NQF-registered qualifications. These include the fact that the status of some of the qualifications offered is not clear, and learners may therefore have problems accessing further opportunities in the higher education sector. Blom (2006: 131) noted that there are perceived difficulties about articulation between unit-standards-based qualifications and non-unit-standards-based qualifications: “The systemic arrangements to achieve such routes are seen to be neglected by the authorities responsible for systemic coherence”. The DHET (2012: 13) also cites a lack of coherence and articulation, as well as fragmentation in the post-school system, despite the vision and mission of the Department to create a “rational, seamless, higher education system” (DoE, 2003: 5)

2.10.5 Is Accreditation a Choice?

The following extract from SAQA (2004: 7) answers this question: “The most important implication is that SMME education, training and development (ETD) providers may opt not to seek accreditation. This will have an impact on the right of such providers to offer education and training programmes and, just as importantly, leave them outside of the quality assurance spiral”. In other words, it would be very difficult for the SMME provider to survive if it was not accredited, and additionally, any provider not accredited risks being prosecuted (Chapter 1). Compliance is therefore a necessity.

According to Nitschke (2000: 4) the most visible external pressures are often linked to “staying in business” by meeting the compliance requirements established by other agencies or organisations. Providers therefore react to the performance standards established, with the motivation for change being continued accreditation, and completion of the accountability paperwork on time for regulatory authority in order to pass the accountability audits – life becomes easier by “simply meeting the compliance requirements these entities set forth”. According to Nitschke, this reality must not be minimised, since it is understandable and necessary, and to ignore the compliance requirements of regulatory authorities and their accreditation criteria would be foolish.

At the same time, Nitschke (*ibid.*) notes that providers’ problems begin when they see their purpose and value as simply meeting the compliance requirements, which could put them at risk of ignoring other important stakeholders such as investors or customers. According to Nitschke (*ibid.*), the challenge is to create a new “balancing act” of meeting both the (individual) customer requirements and the externally established compliance requirements.

The Task Force on Higher Education and Society (2000: 61) notes that “accountability does not imply uncontrolled interference, but it does impose a requirement to periodically explain actions and have successes and failures examined in a transparent fashion”. Compliance also does not necessarily equate to quality and, indeed, may have unintended negative consequences for quality and academic freedom (Brown, 2004: 86).

2.10.6 The Current Situation

Developments in the education arena over the last decade have been characterised by constant bureaucratic change and ever-growing complexity. This puts private providers in a very difficult situation. Umalusi (2008: 26) indicates that private providers have pleaded “for clarification and simplification of the processes that providers need to undertake in order to be NQF-compliant”, and concludes (*ibid.*: 28) that “the quality assurance terrain in which private FET providers currently operate is over-complex, with duplication of activity in some areas and neglect in others”. Fielden and LaRocque (2008: 1) state that such regulation may push private providers to operate outside the law as unaccredited or ‘clandestine’ providers, thus leaving the government with less power to protect students and families, particularly those on low incomes. This avoidance of accreditation is a phenomenon that has been mentioned several times in this literature review.

Furthermore, it is clear that the current policy and regulatory environment is not at present stable enough for anyone to make any final decisions on a quality assurance approach to the sector. Umalusi (2008: 30) strikes a positive note in recommending that, “in the interests of simplification, research should be done on the identification of minimum institutional criteria. In addition, there needs to be a clearer picture of what institutional information has already been gathered through other means, so that there is not so much duplication of effort from the regulatory authorities”. Blom (2011: 14) has highlighted that the information on private providers available is fragmented and incomplete, so it certainly seems that this is a crucial problem that needs to be addressed. Nevertheless, Fielden and LaRocque (2008: 11) maintain that a regulatory framework that both supports the private provider and provides for quality assurance of these organisations is crucial in ensuring the sustainability of the private education sector in developing countries in the longer-term.

2.11 INSTITUTIONAL DESIGN

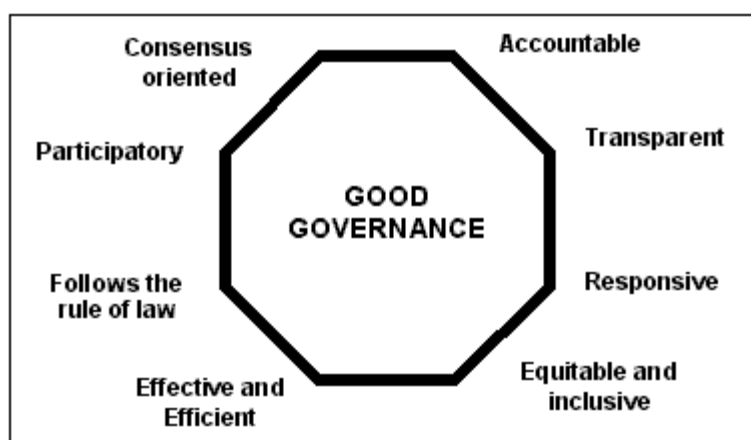
Institutional design refers to the system or arrangement of relationships of an organisation (Handler, 1996: 81). These relationships are both internal and external.

2.11.1 Legal Constitution

In terms of the NQF Act, 2008, all private providers must be legal entities (either a close corporation or a company). This means that they have to comply with the regulations of the Companies Act, 2008 or the Close Corporations Act, 1994.

It has already been noted that the majority of providers are SMMEs, tending towards being micro-providers. Thus, while the choice offered by the Companies Act, 2008 is wide, most providers would fall under non-profit companies or private companies with a sole shareholder and director (Companies Act, Section 8; Office of the Presidency, 2008b). Irrespective of size, compliance with the Companies Act places an obligation upon the provider to exercise good governance, which has eight major characteristics (UNESCAP, n.d.: n.p.). It is participatory, consensus-oriented, accountable, transparent, responsive, effective and efficient, equitable and inclusive and follows the rule of law. It assures that corruption is minimized, the views of minorities are taken into account and that the voices of the most vulnerable in society are heard in decision-making (this harks back to stakeholder engagement). It is also responsive to the present and future needs of society. The principles of good governance are illustrated in Figure 2.9 below:

Figure 2.9: Characteristics of good governance



(Source: UNESCAP, n.d.: n.p.)

Good governance requires that legal frameworks should be fair and impartial. We have seen in the discussion in the previous section that reference has been made to the need for a more effective and enabling environment in this regard (National Planning Commission, 2011: 268; DHET, 2012a: 9) as the complexity of the current regulatory requirements places a heavy burden on private providers who need to comply with the law. We have also seen that providers are expected to be accountable in meeting accreditation requirements; and responsive and consensus orientated in involving stakeholders. An aspect of meeting accreditation requirements is transparency in that information must be freely available and directly accessible to those who will be affected by such decisions. The policies previously discussed would be relevant in this instance.

A private provider, for example, must conspicuously display its accreditation status in its advertising, on its premises, website and information materials such as brochures, so that students are aware of its accreditation status (Umalusi, 2010b: n.p.; Office of the Presidency: Higher Education Act of 1997, Section 55). An exception is that private providers that offer short courses and skills programmes exclusively do not have to register (*ibid.*). Accreditation status has largely been used as a marketing tool in attracting students. There is a growing public awareness of unaccredited providers, and ongoing reports about this in the news where unaccredited providers have come under the spotlight (Blaine, 2010: n.p.; Umalusi, 2011a: n.p.; GBSA News, 2011: n.p.; IOL News, 2013: n.p.).

To ensure transparency, student information would include policies around assessment, discipline, and codes of conduct as well as information about its appeals policy and complaints resolution procedures (THETA, n.d.: 25).

2.11.2 Organisational Size

Providers vary greatly in size, and there are problems finding common criteria for defining size. For example, “the criterion of learner numbers per annum means one thing when applied to a full-time course that takes place over a period such as a year; another if the numbers refer to part-time students taking the same course over a longer period; and something completely different if applied to throughput in a two- or three-day course” (Umalusi, 2008: 6). Size is also linked to purpose, in that many large providers are multi-purpose, and have a variety of sites or organisational divisions for different types of programme offerings across different NQF bands, while others are small, single-site providers, targeting a particular type of course and market niche. With regard to quality

assurance, there are no prescriptions regarding size, but there is a requirement that a provider must be financially sustainable (Akoojee & McGrath, 2007: 212). If an organisation is accredited and sustainability subsequently becomes problematic, students may suffer financially.

According to Blom (2011: 8):

- Only 3-5 private HE institutions can be considered to be large with more than 5000 annual enrolments. Between 5 and 9 institutions are medium-sized. Nevertheless, the top 10 private HE institutions contributed 50725 enrolments in 2009.
- For the sample of 175 private FET colleges (out of 434) in Blom's study (*ibid.*), the total enrolments in 2010 were 51592.
- Enrolment figures at private FET colleges are much lower per institution than at private HE institutions, with a maximum, in 2010, of 3952 (*ibid.*).

There is, however, some duplication of counting as has already been noted, with some providers being accredited by multiple SETAs; this is exacerbated by the fact that some providers have multiple accredited sites that are counted as separate providers. The problem is compounded when different categories are introduced such as providers accredited for whole qualifications, and/or unit standards and/or short courses. Blom (2011: 10) notes this as well in saying that a "common approach to data generation, collection and analyses in the future" would help the regulatory authorities to get a clearer picture of the sector. This problem could be solved by creating a SAQA database on which all providers from all SETAs and Quality Councils could be listed, as follows:

Details of provider	SETA 1	SETA 2	... SETA 21	Umalusi	CHE	QCTO
Provider 1						

This would then give a much clearer picture of the situation of multiple accreditations across NQF bands and possibly assist the regulatory authorities with their understanding of the private sector. SAQA has recently included the requirement for an additional field to be included in learner uploads to the NLRD, namely the GPS coordinates of the provider

(SAQA, 2012c: 5), which may help to provide this information, although the purpose of this is not clarified in the SAQA document.

2.11.3 Institutional Types

“Institutional types in private education and training extend to the dimensions of ‘Conventional College’, ‘Education and Training Providers’ and ‘Workplace Providers’, in addition to for-profit and not-for profit organisations” (Blom, 2011: 7).

A conventional college is one that provides full time face-to-face tuition on a campus rented or owned by the organisation. Examples include large colleges like Midrand Graduate Institute, Varsity College, Damelin, PC Training and Business College, as well as smaller colleges like Regenesys. Such colleges may also offer part-time courses in the evening or on weekends. They offer a range of whole qualifications, short courses and unit standards. Some have multiple campuses spread across South Africa.

Education and training providers are defined in the SAQA Act, 1995, as bodies which deliver learning programmes that culminate in specified National Qualification Framework standards and/or qualifications, and that manage the assessment thereof (this would surely include conventional colleges, so Blom’s identification of this as a separate category is not quite clear). “Workplace providers are employers who make specific arrangements to support the workplace learning component in learnerships and learning or skills programmes” (NQF Support Link, n.d.: n. p.). Workplace learning is the learning that happens on-the-job. It might include experience of the routines and culture of a particular industry as well as specific organisational training. The workplace provider may, for example, make mentors, facilities and time available to reinforce the learning that takes place. If they accommodate learnerships, workplace providers are required to be accredited by the relevant SETA to which their skills development levy is paid, and have to undergo similar quality assurance audits to other training providers. Clearly, these providers are going to fall under the QCTO in the not too distant future.

2.11.4 Delivery Modes

SAQA (2001: 19) states that provision can take a variety of forms including face-to-face or classroom-based tuition, distance learning, a combination of face-to-face and distance (so-called mixed-mode), self-study and on-the-job, and can take place through a variety of media including “traditional lecturing methods”, “sit-by-Nellie”, multimedia and on-line learning.

However, a phenomenon that has gradually made its appearance in the last two decades is a ‘continuum’ of modes of provision between the imaginary poles of distance and solely face-to-face provision, largely due to technological developments (Bitzer, 2009: 169). The clear distinction that used to exist in this regard has gradually been eroded and replaced by a mixed mode of delivery for many public institutions, a fact acknowledged by the publication of the Draft Policy Framework for the Provision of Distance Higher Education in South Africa (Ministry of Higher Education and Training, 2011: 14). Private providers, on the other hand, tend to be one or the other with traditional delivery methods within a face-to-face-environment, that is, lecturer/student direct interface in a classroom (as in a conventional college setup discussed above), or a mixture of technological delivery methods within a distance environment, for example, the use of written materials supported by videos, DVDs, and webinars; the latter three incorporating some of the elements of traditional classroom-based teaching.

Examples of providers using a mixed-mode delivery system would be the Academy of Learning which uses an “integrated learning system” (Academy of Learning, 2012: n.p.) or Media Works which uses a multi-media approach (Media Works, 2012: n.p.). These are just two examples of many.

2.12 INSTITUTIONAL LEADERSHIP

Qualities that typify excellence in a private provider are said to be: self-regulation and learning, long-range planning, an international perspective, incisive leadership, interaction with stakeholders, equality, and focusing on the student (Strydom, 2006: 31). It therefore seems odd that the accreditation criteria of the regulatory authorities do not appear to include an evaluation of organisational leadership *per se*.

2.12.1 Leadership and Governance

Much of the literature researched in regard to leadership relates to leadership in public institutions. It is often seen to be synonymous with governance. In private enterprise, an important goal of leadership and governance is financial profit. It has already been noted under the topic “institutional design” that private providers can determine their own institutional governance structure, and that as registered legal entities, they are obliged to abide by the Companies Act, 2008, or the Close Corporations Act, 1994, which in turn implies abiding by the principles of good governance. But how does this translate into

leadership and manifest itself in leadership practices? And what are the implications for quality assurance?

Askling and Kristensen (2000: 17) maintain that the learning organisation, as a self-regulating organisation with strong leaders and engaged staff members, is often lauded as the “ideal model of institutional governance” and also adopted by many national agencies and international evaluation bodies as a norm against which the institutions and the quality of their work are evaluated. This is codified in the criteria used by national and international audit teams when the governance and quality work of the institutions are evaluated.

By looking into “best practice” in the strategic management of quality, the OECD (2000: 23) outlined the following requirements for a learning organisation:

- Experimenting and risk taking – starting a private college would be indicative of such a risk;
- Monitoring and evaluation with internal and external benchmarking activities – as required by the regulatory bodies, but also essential to examine progress and redefine purpose if necessary;
- Openness, curiosity and willingness to admit mistakes – this is closely tied to monitoring and evaluation;
- Built-in problem solving mechanisms – learning from mistakes and working in team;
- Absence of complacency – there must be a goal of continuous improvement although there also have to be times of consolidation and equilibrium; regular external monitoring would probably counteract complacency, especially if the provider wants to stay in operation and remain accredited.

Bertelsen (2009: 6) maintains that it is very important to have independent leadership, such as boards composed of experienced and visionary educators, to which Eurydice (2008: 44) adds the incorporation of external stakeholders in institutional governance bodies, who would bring outside perspectives, expertise and additional transparency to governance matters, and also serve to link higher education activities with society.

These ideals are all very well, but a study of leadership in primary schools in Ghana, by Zame, Hope and Respress (2008: 122) suggests that the emphasis of leadership has been largely upon bureaucratic and administrative tasks, as opposed to planning and development of policies and structures. Perhaps this applies to post-school education as well. Zame, *et al.*

(2008: 126) concluded that, while proficiency in these tasks is central to the effective operation of the institution, leadership that is based on a vision galvanises the collective capacity and will of personnel to achieve the goals of the organisation; recognises the importance of data in decision making; demonstrates concern for professional growth; and is critical to the ultimate survival of the organisation.

2.12.2 Evaluating Leadership

According to the South African Excellence Model (SAEM), (SAEF, 1997: n.p.) an evaluation of leadership takes into account how the behaviour and actions of the executive team and all other leaders create strategies that set direction, tangible values and high expectations, which encourage people to excel. The Baldrige Education Framework Leadership category (National Institute of Standards and Technology, 2012: iv) firstly examines organisational leadership; that is, how the organisation's senior leaders address the organisational values, direction and performance expectations, as well as what their focus is on students and stakeholders, student learning, empowerment, innovation and organisational learning. The framework then evaluates public responsibility and good citizenship to determine how the organisation serves as a role model in all of its operations.

2.13 LEARNER PROFILES

In terms of the South African Constitution, a person can establish an education and training provider provided that there are no discriminatory practices that bar access to its services. Baumgardt (2011: 3) shows that the majority of providers indicated that most of their students were Black South African students (between 50-99%) but that they catered for all races. The majority of trainees were either school leavers or mature learners. There was a mixture of employed, self-employed or unemployed learners with some trainers catering only for the unemployed learners and others for employed learners.

Student profiling involves an audit of students' proficiency levels, content knowledge, academic skills, and prior learning experiences so that lecturers have a good understanding of their learners' needs. This would directly influence a provider's choice of teaching method, media technology, course materials and assessment techniques (Mashiya, 2010: 9). The regulatory stipulations require providers to develop and report on their learner profiles as follows (SAQA 2001: 27; Welch, 2003: 5):

- demographic factors – for example, age, gender, geographic location and occupation;

- language profiles – including language ability in the main language of teaching and learning, language background, and multilingual language ability;
- motivation for learning – for example, for career purposes or personal interest;
- educational background/learning experience – for example, prior learning and qualifications, experience with the mode of study, learning skills and styles, and language background;
- special needs such as physical handicaps such as blindness or deafness, or learning difficulties such as dyslexia;
- resource factors such as accessibility of the provider, times available for learning, access to electricity, access to media and information technologies as well as experience and knowledge of this, and financial resources for purchase of stationery and learning materials such as textbooks; and
- success rates of past and present learners.

Glennie and Mays (2009: 6) state that for distance programmes, the student profile is usually different from classroom-based provision: students tend to be more mature, want to study part-time, and are usually employed. Disabled students are able to access distance learning more easily whereas many *viva voce* providers are not able to cater sufficiently for such students. This is a factor specifically checked by CHE in accreditation applications by distance education providers to determine whether the programme offering is fit for purpose (Welch, 2003: 5).

However, according to Rosenberg and Burt (2009: 3) there is a lack of reliable statistics on enrolment in the sector. They also posit that many private providers are not registered with the Department of Education, some do not keep records of students, existing records vary between institutions, and it is hard to standardise them, given the variety of delivery modes. A student may be included in a head count whether s/he has done a two-day short course or a 12-month programme. Furthermore, while the Department of Education has some statistics on its Education Management Information System (EMIS) database, the data is not complete, comprehensive or up-to-date. Blom (2011: 15) corroborates that “only a partial picture emerges” from the available data. The statement by the Monitoring Unit of CHE (n.d.: n.p.) to the effect that PHEIs “do not normally submit data to the national databases” is puzzling since this is a reporting requirement for other providers. If such information is not loaded onto the NLRD, graduates’ qualifications would in all likelihood not be recognised.

Every provider is required to demonstrate that it has a system and a database for keeping detailed information about past, present and potential learners. SAQA maintains this information in the National Learner Records Database (NLRD). The NLRD is the electronic information management system that facilitates the management of the National Qualifications Framework and enables the South African Qualifications Authority to report accurately on most aspects of the education and training system of South Africa (SAQA, 2008a: n.p.). Statistics provided in SAQA's annual report, (SAQA, 2011a: 25), show that as of 31 March 2011, records were available for 10.8 million learners who had completed whole qualifications, while 52.2 million had completed unit standards. It should be noted that there are multiple unit standards per learner so this does not reflect individual learners. Put another way, there are many learners who have completed more than one unit standard, so this is a confusing statistic because the entire population of the country is 51,7 million (Statistics South Africa, 2012a: 22). Blom (2011: 56) notes that it is almost impossible to assess the total number of students in the private post-school system, but states that SAQA's data suggest that over 500000 students in approximately 20 years (1991-2010) had achieved qualifications through private post-school education, although there is clearly some double counting. There is, however, a major problem with the Higher Education Management Information System (HEMIS) in that statistics are either not uploaded or are only partially available, and are seldom verified (Blom, 2011: 15). This points to systemic problems with the regulatory authorities' databases, and so it is very difficult to place any reliance on these statistics. It should be noted that, according to SAQA (2011b: 27), the Higher Education Quality Council Information System (HEQCIS) is newly established, but Blom (2011: 13, 15) raises the issues of outdated and unverified data because of weak data management (*ibid.*: 7) while the National Planning Commission (2011: 271) refers to "fragmented data". This has led to difficulties in the quantitative analysis of the private post-school sector, and must contribute to the stated lack of understanding of the private provider.

2.13.1 FET Learner Profiles

According to Umalusi (2008: 3), learner profiles are varied, both across and within institutions. They may include:

- people who have enrolled as individuals of their own accord;
- learners who have been enrolled for specific training by employers or companies, or for funded interventions;

- learners who already have a senior certificate (or higher qualification) and wish to improve their occupation-specific or technical skills at FET levels;
- learners who do not have a post-school equivalent certification; or
- learners who are generally older than the majority of those in public FET, and more often already in employment (Akoojee & McGrath, 2007: 217).

2.13.2 HET Learner Profiles

A wide literature search did not reveal much information about the general learner profile at PHEIs. This is a further indication of a gap in the regulatory authorities' knowledge and understanding of the sector and a symptom of their poor record-keeping.

According to Kruss (2007: 152), students choose private higher education institutions that offer mobility because they believe that they offer better qualifications, either because they are internationally recognised or because they are more closely tied to the workplace, and also offer flexibility and a privileged, more personalised environment. Students that choose institutions offering specialised credentials might do so because they offer lower fees, flexible modes of learning and greater employment opportunities (*ibid.*). Deductions from this research can therefore be made that learners are:

- possibly more sophisticated and discerning than those that attend public HE institutions where classes tend to be very large and impersonal;
- financially more privileged, especially when one considers that students registering at PHEIs do not have access to NSFAS funding, and so have to carry the cost of the courses themselves. (Kruss's comment about "lower fees" needs to be questioned in this regard);
- ambitious, wanting qualifications that will "guarantee" them employment;
- possibly seeking the option to work overseas; and
- possibly employed and, therefore, seek flexible modes of learning.

2.14 CURRICULUM

Curriculum is an essential ingredient in the quality assurance of providers. The Department of Education (2001: 1) states that a curriculum is fundamental to the education process and has a pivotal role to play in the transformation of education and training, a stated objective of CHE (2011: 14). Providers are obligated to structure their programmes around NQF-

registered qualifications if they want their programmes to be accredited and recognised in the market place.

2.14.1 Understanding What a Curriculum Involves

SAQA (2000: 6) describes curriculum as the process of learning that is linked to achieving the values and beliefs of an ‘ideal’ society. A curriculum is thus more than just syllabus documentation. It refers to everything involved in teaching and learning such as:

- the aims and objectives of the education system and the specific goals of the learning institution;
- the content of what is taught (values, content, subjects, programmes, syllabus and what skills and processes are included);
- the strategies and methodologies of teaching and learning;
- assessment and evaluation processes; and
- how the curriculum is supported and resourced (scheduling, materials, student counselling).

Angelis and Marock (2001: n.p.) state that curriculum, narrowly defined, is “a list of subjects to be taught and a set of entries on the timetable”. A wider definition would refer to “the totality of planned provision through which any organisation sets itself to achieve its educative purpose, a notion which would include what is often seen as ‘extra-curricular activities’” (*ibid.*). Curriculum, in its broadest sense, would therefore cover an institution’s total contribution to the students’ learning experience.

The issues of curriculum are very complex, as government would like to control content and has, indeed, attempted to do so in the establishment of the NQF, and the way in which qualifications are designed. The problem is that many of the qualifications registered on the NQF are the so-called “legacy qualifications” (Umalusi, 2008: 39) which were “developed by providers themselves prior to the registration of relevant unit standards or qualifications” to meet the needs of their particular market. This is further complicated by the fact that providers can have their “learning programmes” registered against a generic qualification that has been designed by a Standards Generating Body (SGB) or Consultative Panel, but each of these learning programmes is adapted to some extent by the provider in terms of curriculum materials, assessment and the amount of student support that is provided. To compare one

provider's qualification of learning programme therefore becomes an almost impossible task, leading to the articulation problems that this thesis frequently mentions.

2.14.2 FET Programmes

The range of programme offerings in the sector is extensive, and includes: academic qualifications (for example, the senior certificate); vocational qualifications (now known as NC(V)s); unit-standards-based occupational qualifications (sometimes linked to learnerships); and legacy qualifications, or "provider qualifications" (Umalusi, 2008: 14) as mentioned above. Each mentioned class of qualifications has its own rules of combination, entry requirements, purpose and content, creating a complex mix of factors, which is not always easy to understand or implement. Many providers also offer international or vendor-based qualifications (which are not qualifications as defined in the SAQA sense). The programmes and qualifications span the twelve SAQA fields of learning, which are as follows:

- 01 Agriculture and nature conservation
- 02 Culture and arts
- 03 Business, commerce and management studies
- 04 Communication studies and language
- 05 Education, training and development
- 06 Manufacturing, engineering and technology
- 07 Human and social studies
- 08 Law, military science and security
- 09 Health sciences and social services
- 10 Physical, mathematical, computer and life sciences
- 11 Services
- 12 Physical planning and construction

It should also be noted that some private providers that are accredited by Umalusi offer programmes outside the FET band, either at NQF Level 1 (for example, the Adult General Education and Training Certificate (GETC)), or at NQF Level 5 (HET) (for example, N4 and N5 courses, or some NQF Level 5 professional body qualifications, occupational qualifications or part qualifications). This issue has been highlighted in the draft GENFETQF (2011: 13).

In addition, private providers also offer a variety of short courses. These can be defined in various ways, and encompass a number of different purposes:

- Skills programmes based on unit standards: they are thus registered on the NQF and credit-bearing, and can be defined as “part qualifications” in that they could build up to whole qualifications, depending on the rules of combination of those whole qualifications.
- Specifically targeted at a particular set of skills (for example, office practice or computer courses) and may not be unit-standard-based.
- Vendor-specific courses such as those in information technology, and certificated by the vendor (for example, Microsoft or Pastel).
- Designed to the requirements of a client or the needs of a specific workplace.

The DTI (2008: 158) also states that many SMME ETD providers offer short courses (the kind of training that the Minister of Higher Education and Training is concerned about and negatively disposed towards, as mentioned above) (Polityorg.za, 2011: n.p.). The core business of many of these providers is knowledge transmission with a vocational focus (Garton, 2010: 7). It would appear that provision of short courses is often a response to market demand.

Akoojee (2005: 27) points out that “programme duration serves as a significant characteristic feature of private provision”. The figures in Akoojee’s study showed that 33% of the programmes were between one and seven days’ duration, while about 65% were short programmes of less than six months. The remainder were divided between 6 and 23 months, with only 5% having a duration of two years, which is more typical of a whole qualification.

According to SAQA (2013: n.p.), as of March 2013, there were 825 provider-based FET qualifications registered and 15540 unit standards. Many of these are generic qualifications or unit standards, namely those that were designed by a Standards Governing Body (SGB) and then offered as learning programmes by a provider. A generic qualification is often unit-standards-based while provider qualifications are generally not based on unit standards and consist of exit level outcomes that a learner must achieve.

It should be noted that unit-standards-based qualifications are much more onerous to assess. Research has shown that assessment of unit-standards-based qualifications takes up about 30% of a lecturer’s time, and results in an increase in workload and administration in order to

meet compliance requirements (Sundar, 1999: 3; Ramsaroop, 2003: 78; Master, 2011: 32). The DHET (2012: 12) posits that “for many providers offering short programmes aimed at professional, organisational or community development, it is difficult to fit the training that they do into unit standards, let alone find accredited assessors to assess it, and moderators and verifiers to moderate and verify it”. It adds (*ibid.*: 15) that the NQF system has created a proliferation of qualifications and unit standards, but there has been no corresponding increase of educational provision. Research commissioned in the process of writing the Green Paper, 2012, has found that unit-standards-based training in particular may have made it very difficult for providers to tailor-make courses for employers and communities (*ibid.*: 16). In addition, research has demonstrated that unit standards tend to fragment knowledge (Flagg, 1999: 1; Tuck, 2007: 61) and have a negative impact on the coherence needed for mastery within a specific field. Despite the problems, it should be noted that if a provider wishes to be accredited, its programmes must be NQF-aligned, which would appear to perpetuate the difficulties mentioned here.

2.14.3 HET Programmes

As per the requirements of the HEQC, CHE is responsible for the “generation and setting of standards for all higher education qualifications” (CHE, 2007: 7). Blom (2011: 44) indicates that, according to the DHET register (11 May 2011 update), private HE institutions offer qualifications across the full range of higher education programmes, namely Higher Certificates, Advanced Certificates, Diplomas, Advanced Diplomas, Bachelor’s degrees, Bachelor Honours degrees, Postgraduate diplomas, Master’s degrees and Doctoral degrees. An additional three ‘types’ of qualifications appear, namely ‘Certificate’, ‘Higher Diploma’ and ‘Graduate Diploma’. It is not clear whether these are curriculum-based or unit-standards based qualifications, but Nel (2011: n.p) states that CHE/HEQC does not recognise unit standards, so it is likely that the qualifications are all “curriculum-based”. A further category which tends to be a bit of an anomaly is that of “professional qualifications” which are neither certificates, diplomas or degrees, and yet are generally registered on the NQF in the Higher Education Band (NQF Levels 5-10), but are not recognised by universities or the Council on Higher Education.

It is therefore a huge task for the HEQC to adequately quality assure the providers of qualifications in this band, given that quality assurance audits need subject matter experts as well as people versed in quality assurance. However, as of May 2012, a concerted effort

began to rid the NQF of all dormant qualifications and unit standards (SAQA, 2012b: n.p.) particularly in view of the new dispensation of the QCTO coming into operation. According to SAQA (2013: n.p.), as of March 2013⁵, there were 11800 provider-based HE qualifications registered on the NQF.

2.15 FACULTY KEY SKILLS AND ABILITIES

2.15.1 What Constitutes Quality Teaching?

Lovat (2005: 4) states that research has proven that quality teaching has the power to overturn the disadvantage of learning barriers based on gender, class, language or even disabilities of sorts. Goldhaber (2002: 3) confirms that teacher quality is probably the most important factor affecting achievement, but also the most difficult to evaluate. As a result, most studies resort to evaluating quantitatively measurable outcomes such as certification, academic degrees, and years of experience rather than teaching expertise, rapport with students, communication skills or professionalism (Laczko-Kerr & Berliner, 2002: 6). In other words, there is an emphasis on outputs rather than inputs.

Despite the difficulties involved in assessing teacher quality (Goe, 2007: 1), a search of the literature on this topic (Biggs, 2003: 75; Mohanan, 2005: n.p.; Lovat, 2005: 2) reveals that the following factors are characteristic of quality teaching:

- A well-structured, deep knowledge base; which can be passed on to the students. This implies that educators should have a qualification in the discipline or field they are teaching;
- An appropriate motivational and supportive context; with the ability to deal with standard classroom problems, including giving feedback to students, providing a positive role model, having a passion for the subject, and being empathetic to the students;
- Provision for learner activity, including interaction with others and design of exercises that will provide for practical application;
- The ability to apply the knowledge to novel and relevant types of problems and situations; and
- Self-monitoring or self-reflection.

⁵This database is updated every two months so numbers will vary from time to time.

Hénard (2009: 27) identifies the following negative influences on quality teaching particularly in vocationally-orientated organisations such as the private providers that are the focus of this research:

- The teaching process is driven by academics, mostly practitioners from the corporate world who are experts in their field but not necessarily trained in pedagogy. This is called “academic drift” (Edwards & Miller, 2008: 2) meaning that emphasis is given to educational rather than occupational relevance in the vocational curriculum.
- The diversity of employees within the institution (professionals, foreign teachers, and part-time teachers) combined with an increasing variety of students might result in incoherence and inequity of the teaching process. Akoojee (2005: 37) found that while most management and administrative staff are full-time appointments, almost 60% of teaching staff are employed on a part-time basis.
- The shift from elite universities to mass universities has modified the student body and their expectations (for example, working students enrolling in lifelong learning programmes that require adapted curricula and a flexible educational path). Regulatory authorities are mandating institutions to successfully prepare students for the job market, and to help them become responsible citizens. Students also expect that the courses they take will help them to acquire work. This harks back to the learner profiles discussed earlier.
- Teachers are not always up to date with the latest knowledge in the field of what they are teaching. For example, for programmes requiring technical skills, like information technology or healthcare studies, teachers need to keep abreast of the latest developments. Hénard (2009: 29) states that in career-oriented or vocational training programmes, students often complain of lack of programme consistency or that the teacher does not have sufficient practical experience. He goes on to say that providers should be aware that student and alumni associations can easily benchmark the provider in terms of learning conditions, teacher attitudes, pedagogy and support, and hence may either promote or undermine the reputation of the institutions.

2.15.2 FET Staff Profiles

There is limited qualitative insight into the staff profiles of the FET sector. Wedekind (2008: 13) describes the state’s FET colleges as “a black box”. He notes that we know very little about the learners in these institutions, and even less about the lecturing staff, their

motivation for working in these institutions, and their needs and aspirations. Inadequate staff qualifications may be the reason for the poor throughput rates discussed in Chapter 3, and there are few studies to explain the high failure and non-completion rates reported for the state FET sector. However, according to Rosenberg and Burt (2009: 20), staff in private training institutions generally do not have a good reputation, and education specialists are often doubtful about the quality of courses presented by lecturers with no educational background. Nevertheless, the throughput rates of private providers far exceed those of public FET colleges, so it would be interesting to know what leads to these perceptions given that private provider assessments are quality assured by the relevant regulatory authority.

In various studies over the last ten years only 64% of teaching staff were found to have formal qualifications with either a certificate or a diploma, 36% had university qualifications, (Akoojee, 2005: 37; Akoojee & McGrath, 2007: 219) and 34% had a postgraduate degree (National Planning Commission, 2011: 271). However, current requirements for teaching in private FET colleges are often dependent on the nature of the programmes being offered. Lecturers with practical experience and expertise in the occupational sector related to a programme are often appointed rather than those who have formal teaching qualifications. This is particularly related to the emphasis on purpose-driven short courses offered by the private providers, with an emphasis on experience in hands-on training, facilitation or mentoring.

There is no clear understanding of the quality standards in this regard in the absence of a clear framework for lecturer qualifications and minimum requirements for appointment (Gewe, 2010: 14). Be that as it may, the Professional Accreditation Body (2010: 4) states that in the public education arena, lecturers must have a qualification at least one level higher than the programmes offered. One would therefore assume that, because standards in private provision must be equal to or better than those of public providers, this would be a minimum standard. This is corroborated by FASSET (2012: n.p.), SAQA (2005: 12) and CHE (2003: 32) in stating that assessors' subject matter knowledge should be at least one level higher than the learner who is being assessed – part of any lecturer's job is assessment of the learners they teach. A brief survey of advertisements for lecturer or facilitator posts shows that they often contain such a proviso so this is standard practice. The so-called facilitator unit standard 117871 (Facilitate learning using a variety of given methodologies) states that the credit calculation for achieving the unit standard is based on the assumption that facilitators are already competent in the learning area in which they will provide training

(SAQA, 2012a: n.p.). This is not explained and appears to be a very grey area in terms of quality assurance measures, but would tend to support the brief discussion above. Whether this plays out in reality, is yet to be proven.

What has become of greater concern than the method of delivery, briefly discussed above, is the quality of “teaching”, identified as a major problem in public post-school institutions (DHET, 2012a: 24; National Planning Commission, 2011: 267). In this regard, it is interesting to note that private providers are obligated to provide the curricula vitae of their teaching staff as part of their accreditation applications, and to indicate what modules they would be responsible for. In addition, assessors and moderators at private providers must be trained on the relevant unit standards and be registered with the ETQAs in order to carry out assessment or moderation. Without that, the provider’s results cannot be verified; and consequently, the learners’ results cannot be uploaded to the NLRD. By contrast, lecturers at public institutions are not required to be so trained or registered, and are deemed to be qualified to assess and moderate. It seems likely that this is the element (namely proper assessment and moderation) that makes the difference to the throughput rates of private providers, despite the problem with lecturers’ qualifications.

2.15.3 HET Staff Profiles

CHE (2003: 29) found that most private providers have a ‘skeletal’ core staff on a full-time basis and maintain the rest of the staff on contracts or part-time employment. This situation was found in 72% of the cases analysed. The same study found that in 67% of the cases analysed, staff did not have the qualifications, skills, or experience necessary to teach the courses for which they had been employed, and that there was very little, if any, focus on staff development, mainly because of the part-time nature of the employment. It is difficult to reconcile this state of affairs with quality education, and it clearly compounds the negative perceptions that the regulatory authorities have of private providers.

2.16 RESOURCES

Fielden and LaRocque (2008: 13) found that many regulatory regimes stipulate criteria for private providers relating to financial reserves, physical infrastructure and resources. One of the legal requirements in South Africa is that a private provider must provide a surety (Section 13 (10) of the Regulations to the Higher Education Act) in case of financial difficulties which might disadvantage students who are “in the pipeline” so to speak. It

should be noted that the reasons for cancellation of institutional accreditation include the failure to submit a financial surety agreement or audited financial statements (Sehoole, 2012: 3). This translates into a SAQA accreditation requirement, for example, that private providers should have the necessary financial, administrative and physical resources to deliver their programmes (SAQA, 2001a: 18). The provider needs therefore to demonstrate its capacity to deliver the programme effectively and efficiently and to be accountable for the results it achieves. In this regard, the provider should be able to answer the following questions:

- What is the management and administrative structure of the organisation, and how are decisions taken in the organisation, by whom and in relation to what? This relates to leadership issues discussed earlier.
- What is the financial resource base of the organisation? Providers are expected to have the necessary financial resources to ensure sustainability of the organisation. A related question would be about the systems used by the organisation to manage and be accountable for its finances.
- How does the provider ensure that its goals and objectives are met? Providers are expected to have adequate quality management systems in place, and it has been said that many of them are excellent (Jacobz, 2005: 54).
- Does the organisation have adequate human and material resources to carry out its intended functions? It has been observed that full-time staff tend to be administrative while teaching staff are often temporary, contracted workers.
- More generally, to what extent is the organisation run in ways that are transparent and accountable? This refers to issues of governance also discussed earlier.

My aim in this section is, therefore, to try to answer these questions in a generic sense, and then to take some of these questions through to the empirical research.

2.16.1 Management and Administrative Structures

One of the items asked for in an accreditation application is an organogram of the organisation. An organogram is a diagrammatic representation of the structure of the company, which shows the reporting relationships.

While this may be a fairly straightforward request, an organogram depends on the size of the organisation. It has already been noted that there is no prescription about size and that more

than 80% of private providers are micro-providers, and there may in fact be no staff employed by the owner, hence no organogram. A large provider may, on the other hand, have a very complex organogram.

We need to consider the concept of “fit for purpose”. In some cases, a home office with a computer, an answering machine, a cell phone and no staff could be enough, for example, where a provider is presenting short courses or unit standards training on-site; while large providers offering whole qualifications to thousands of students would need a much more complex organisational structure and infrastructure. Umalusi (2008: 28) makes a good point in stating that “the institutional character of many sites is not one-dimensional”, noting that in the FET band, provision reflects:

- an extremely varied range of qualification and programme types;
- a wide variation in the purpose, scope and duration of programmes; and
- a variation in learner profiles and delivery mechanisms.

Obviously, size would have an impact on decision-making as well, with the single-person training provider making all the decisions and the large providers having boards and committees to which various issues would need to be referred for discussion and decision, particularly where large financial investments may be needed.

In this regard, the regulatory authorities could not expect the micro-provider to be able to provide all the facilities that the large provider does. That certainly would not be an efficient use of resources (both a governance requirement and an economic factor, discussed in more detail in Chapter 3). What is important is the quality of the training provided. This raises the following questions: Are learners developing competences and acquiring relevant skills and knowledge? Does the learner or his sponsor receive value for money? Throughput rates would be an important barometer in this regard.

The mechanisms for measuring service quality of courses and programmes often rely on research instruments such as student feedback questionnaires or student satisfaction surveys devised by education institutions to provide data that address external audit criteria (Shago, 2005: iii; Combrinck, 2006: 9). Such surveys gather information from students and are an important instrument in evaluating the effectiveness of an institution. They also form part of regulatory accountability procedures at the institution and are an integral part of the QMS of

a provider as it seeks to improve the quality of its services. Student feedback and evaluation are therefore an essential part of the quality assurance process (Shago, 2005: 6).

In fact, criterion 19 of CHE institutional audit criteria (CHE, 2004a: 20) requires the provider to supply evidence that would indicate that the quality criteria are being met. These include student satisfaction surveys, impact studies, and regular reviews of policies and procedures, all with the aim of enhancing the quality of provision.

2.16.2 Financial Resources

According to Fielden and LaRocque (2008: 11), a common feature of the regulatory regimes in developing countries is that funding policies generally favour public provision over private provision. This is evident in the fact that students attending private providers in South Africa do not have access to the National Students Financial Aid Scheme.

SAQA (2004: 7) notes that the financial status of SMME providers varies significantly, from survivalist providers that are barely able to make ends meet, to others that generate substantial income, with the cost of gaining accreditation in many cases being unaffordable for the majority of the former category. The most important implication is that SMME providers may choose not to become accredited. This has a detrimental impact on the right of such providers to offer education and training programmes and, just as importantly, leaves them outside of the quality assurance spiral. The complexity of the QA regime is obviously a negative contributory factor in this regard, pointing to the previously emphasised need for a more enabling regulatory environment.

The issue of “education for profit” can be problematic (Goldman, Gates, Goldman, Brewer & Brewer, 2002: 150; Washburn, 2005: 221), but for the continued existence of a private provider, financial resources are paramount. The main source of funding for most private providers whether non-profit or for-profit is student fees (Kruss, 2004: 102) although some providers tender for grant funding from the SETAs. Unfortunately this has been found to be fraught with a range of unethical practices such as fraud, corruption and ‘tenderpreneurship’⁶ (DHET, 2010: 12), and, as we have seen in Chapter 1, the Minister believes that SETA funding has been used wastefully on short courses without much value. Nevertheless, it has been found that financial management by providers appeared to be in good order (Umalusi, 2008: 26).

⁶ Tenderpreneurship is a South African term coined to describe the use of powers and influence by government officials or politicians to secure lucrative government tenders and contracts.

As legal entities, (companies or close corporations) private providers are expected to keep accounting records and to present audited financial statements or three-year financial projections to the ETQAs on application for accreditation and for monitoring purposes. At the end of the day, the regulatory authorities want to assure themselves that the provider has the means to meet its financial commitments to the learners it enrolls and is a sustainable organisation.

2.16.3 Information Systems

In terms of information, the routine reporting of statistics with regard to students, staff, and finances, and the submission of audited accounts to an accreditation body or to government is accepted as a necessity (Fielden & LaRocque, 2008: 19). However, in their opinion, monitoring should be “non-intrusive” and rather should be focused on factors relating to the quality of education provided (*ibid.*).

North (n.d.: n.p.) notes the burden placed on institutions that are trying to comply with the various reporting requirements of the regulatory bodies, each with its own set of accreditation criteria and different formats for reporting and different information. Nevertheless, in order to retain their accreditation, providers are obliged to comply with the information demands of their ETQAs or suffer the consequences. The regular updates of the PHEI register show, for example, that some PHEIs have been deaccredited when they have been unable to meet compliance requirements. North (*ibid.*) proposes a developmental approach from the authorities, with streamlined requirements both to “simplify the information management task that providers are facing, as well as to support information exchange among providers and between the provider and those concerned with ensuring articulation and portability of credits”.

It has already been noted that data on private providers is fragmented, which militates against building a coherent picture of provision, but it is essential to “eliminate duplications and overlaps, and to verify information across sectors” (DHET, 2012a: 48). Furthermore, authorities (including the Quality Councils, quality assurance bodies, the DHET, and SAQA's National Learner Records Database) conduct little regular analysis of the data they obtain from institutions (Blom, 2011: 12, 15). Data management in general appears to leave much to be desired (DHET, 2012a: 48; Blom, 2011: 7). The DHET (2012a: 41) has recognised the need for a single information management system with a single information standard for all colleges and campuses (both public and private). The system could be arranged to better

facilitate extraction of information relating to private providers for analysis or comparison. This would aid in understanding the private provider, at least on a quantitative basis.

2.17 CONCLUSION

The focus of this chapter was on the micro-elements of quality assurance in education, against a backdrop of the need for social change and transformation and stakeholder engagement with regulatory authorities. The micro-elements include the regulatory authorities, leadership and governance, institutional design, human and financial resources, policies and practices, learner and staff profiles, and curriculum offerings. The case presented here provided evidence that private providers generally display compliance with the quality assurance requirements relating to these micro-elements but that there are daunting challenges that they need to overcome, the main one being the ever-changing regulatory requirements and different interpretations thereof by the bodies responsible for implementing the regulations. There is a willingness to comply, but sometimes it becomes so overwhelming that it is very difficult to meet every expectation.

Although the regulatory environment is unnecessarily complex, there remain thousands of accredited private providers offering a wide mix of full-time, part-time and short courses to a heterogeneous market. Nevertheless, it appears that the actual quality of the education and training provided is variable, particularly with regard to the qualifications of academic staff. That the regulatory authorities have not managed their record-keeping and information management to the required standard is a key factor in the lack of understanding of the private provider sector.

These micro-elements will form the foundation of the data analysis and findings that will be presented in Chapter 5.

Chapter 3 examines the macro-elements of the educational environment in which private providers operate, and looks specifically at why private provision of education and training has come to be an important part of the overall system of education.

CHAPTER 3

THE RATIONALE AND CONTEXT OF PRIVATE PROVISION OF EDUCATION AND TRAINING

3.1 INTRODUCTION

The concept of “quality in education” is a significant concern for academia, regulators and providers globally. As evidenced by the development of quality assurance frameworks and protocols over the last three decades, it is clear that there are a number of factors involved in assuring quality in education that are both internal and external to an institution. Any endeavour, either to introduce or monitor quality in academic institutions, needs to take into account the many factors impinging on and influencing quality assurance.

Maniku (2008: ii) argues that the increased emphasis on quality assurance in education has arisen out of neoliberalism which has been driven by the World Bank and other global and international organisations, as they seek to find a universal approach to quality assurance based on policy convergence. Marginson and Sawir (2005) state, however, that there is little theorisation specifically focused on globalisation in higher education, which generally derives from more general theories of globalisation. The discussion is further underpinned by Trow’s (2000) theory of massification of higher education and Marginson’s (2006) egalitarianism and elitism theory, which represent two contradictory, but co-existing concepts that have been closely associated with increasing access to university education and massification in institutions of higher learning.

This chapter presents a background discussion for the current research by analysing these factors. The chapter specifically presents a literature review of worldwide trends in education, which are found at the top of the quality assurance spiral (Figure 1.1), such as internationalisation, globalisation, marketisation, massification, human capital theory, and privatisation (Figure 2.1), which have an indirect or remote influence on the individual private provider.

Throughout the chapter, examples from both the international and South African context illustrate discussion of these major trends.

In each case, the following key research questions examine the role and place of the private provider:

- What trends have led to the growth and development of private providers?
- Why has quality assurance become such a critical focus in education?

3.2 THE PUBLIC/PRIVATE DEBATE ABOUT EDUCATION

In considering the right of the private provider to exist, it is necessary to revisit a debate that has been going on for decades, namely whether education is a public or private good.

Labaree (1997: 39) posited that education has three goals: “democratic equality (schools should focus on preparing citizens), social efficiency (they should focus on training workers), and social mobility (they should prepare individuals to compete for social positions)”, and explained that “these goals represent, respectively, the educational perspective of the citizen, the taxpayer, and the consumer. Whereas the first two look on education as a public good, the third sees it as a private good.”

Mankiw (2012: 218) succinctly defines public goods as those that “are neither excludable nor rival in consumption”. In other words:

- Is there competition for the good or does everyone have free access to it?
- Can a person be prevented or excluded from using the good in some way?

A few examples of public goods are access to water, roads and national security. These will either “not be provided or will be provided in insufficient quantities by the private sector and therefore must be provided by the state” (Dill, 2005: 2). However, wholly public goods are few and far between (Cemmel, 2002: 131), and goods that should be wholly public, such as education, may not always fit these criteria. Labaree’s (1997: 43) definition of education as a public good highlights this by stating that, in some cases such as the political ideal of democratic equality, education is a purely public good while for social efficiency, it is a public good in service to the private sector. The debate also includes the fact that education enhances social mobility for the educated and in this sense, it is a “private good for personal consumption”. A further nuance is added by Jonathan (2006: 17) who identifies higher education as a social good in terms of its benefits to society, and the individuals who have the opportunity to access it, and a positional good, whose value depends on its “desirability in comparison to substitutes” (Ichilov, 2009: 19). So what are the implications of this in South Africa? The discussion below reveals that only school education in the General Education

and Training (GET) Band of the National Qualifications Framework (NQF) can truly be classified as a public good.

School education can be classified as a public good because no child can be excluded from attending school on any grounds. Education is compulsory for all children in South Africa between the ages of 7 and 15, or from grade 1 to 9 (South African Human Rights Commission, n.d: 5). There are still access problems at schools that charge school fees, notwithstanding that children may not be discriminated against if their parents are not able to pay. There are a number of “no-fee” schools meant to accommodate the poor (Department of Education, KZN, 2006: n.p.) as well as a large number of private schools. The many private schools that exist in South Africa are evidence that private education flourishes at this level (UMALUSI, 2011: n.p.), although it remains a matter of parental choice. To some extent, these are “private goods in service to the public sector” (Dill, 2005: 3). The present research does not include this sector.

The situation is markedly different in post-school education and training, which is usually not compulsory, as is the case in South Africa. Ideally, it should be the state’s responsibility to provide such education since the private sector cannot provide for the needs of every citizen (Bergan, 2011: 12). Altbach, Reisberg, and Rumbley (2009: iv) support this view by maintaining that post-secondary or higher education is usually regarded as a public good in that it contributes to society by educating citizens, improving human capital, encouraging civil involvement and boosting economic development. However, Altbach, *et al.* (2009: iv) and Dalrymple (2007: 2) state that for several decades, higher education has increasingly been seen as a private good, largely benefiting individuals, with the implication that academic institutions, and their students, should pay a significant part of the cost of such education. Massification, with its accompanying funding shortages, has also meant that higher education institutions have to generate their own streams of revenue to ensure that they remain sustainable. Universities, for example, charge tuition and accommodation fees (both often the cause of student unrest) and seek grants from private foundations in order to fund their research programmes.

Consequently, it is argued that public higher education cannot properly be classified as a “wholly public good” because for every place available at a university, there is more than one applicant (thereby diminishing the use of the good by another person) and only certain students can gain access. In other words, some students can be prevented from using the

good because their matriculation results are not good enough, or they do not have the necessary fees, or there are simply insufficient spaces to accommodate them. In early 2012, there were long queues at campuses when universities started enrolling students for the academic year, with some students sleeping on the pavements for days in order to be first in the queue (Makamba, 2012: n.p.; Moodley & Tshabalala, 2012: n.p.). Reports of stampedes and complete hysteria were rife as students feared that they would not get a place, to the extent that the mother of one student was trampled to death outside the University of Johannesburg (Germaner & Molosankwe, 2012: n.p.). This is a prima facie indication of the lack of the capacity of the state (in South Africa, at least) to provide everyone with tertiary education.

Part of the problem is that diplomas and degrees have become requirements for employment, as opposed to education being an end in itself. This was called “diploma disease” by Dore (1976: 27) and was defined as an obsession with obtaining as many as possible educational credentials, at the highest possible level. With high rates of unemployment, this is understandable.

Higher education is not available to all who desire it, which begs the question of whether higher education is a public good. It adds weight to the argument that the private provider can contribute in a significant way to education in South Africa. It should be noted that in the South African context, private providers are regarded somewhat charily by the regulatory authorities (Coughlan, 2012: n.p.). Be that as it may, South Africa has in recent decades seen the establishment of a number of Private Higher Education Institutions (PHEIs). As a result, there are more PHEIs than public higher education institutions, although the PHEIs tend to be smaller (Blom, 2011: 8).

The problems with public provision of education have intensified due to:

- the financial challenges posed by massification;
- greater global emphasis on privatisation of services traditionally provided by the state.

3.3 THE IMPACT OF GLOBALISATION, INTERNATIONALISATION AND REGIONALISATION ON EDUCATION

Evidence for the importance of globalisation and internationalisation includes the fact that in 2011, there were some 140 conferences world-wide dealing with these issues (Conference Alerts, 2011: n.p.). Clearly, these phenomena have a major impact on diverse areas of life,

including agriculture, technology, politics, and education. Simultaneous discussion of these two concepts implies that they are exactly the same. Although they are closely interrelated, as is the concept of regionalisation, they mean different things. These phenomena have created both challenges and opportunities in quality assurance in education to which countries and regions have responded in various ways, depending on their traditions, culture, resources and priorities (UNESCO, 2007a: 5). Narasaiah (2008: 34) (who specifically mentions South Africa) posits that enormous costs accompany globalisation as countries, particularly those in the developing world, deal with economic restructuring. In many cases, these countries are struggling to find the capacity to cope with changes (Chandra, 2007: 236) particularly in the educational arena (Knight, 2010: 89).

3.3.1 Globalisation

Burbules and Torres (2000: 9) maintain that there are so many varying opinions and perspectives on globalisation that no definitive definition of the phenomenon is possible. They say (*ibid.*) that it is the effects of what is generally termed globalisation that are important, namely minimal state intervention, greater reliance on free market mechanisms, and “more appeal to individual self-interest than to collective rights” as well as a “growing integration of economies”. Currie (1998: 17) calls it an “economic ideology that calls for the primacy of the market, privatization, and a reduced role for the public sphere” and it is seen as contributing to “social mobility and social justice” (Lee, 2000: 325). Well-managed globalisation is seen to bring about healthy economic growth and prosperity (Suárez-Orozco & Qin-Hilliard, 2004: 16).

The educational arena is not exempt from the effects of the globalisation phenomenon. There is increasing demand for higher quality education and mounting pressure on state resources to provide this (Carnoy, 2005: 3; Woolridge, 2005: n.p.). UNESCO (2007a: 2) posits that globalisation is the outworking of a number of forces:

- the need for massification (discussed further below) especially in developing countries;
- the increasing marketisation (also discussed further below) of higher education brought about by a need to meet the training requirements of industry as well as the increasing numbers of private providers;
- the increasing importance of information and communication technologies in all spheres of life, not the least of which is education; and
- the trend towards internationalisation of education including greater student and academic mobility.

UNESCO (2007a: 2) further states that a holistic view of the education system and all its parts – basic education, secondary education, and post-school education – should be evident in policy and actions related to improving access to higher education. The key is that education should meet the needs of the market in both local and global societies and should create an “awareness of global society” (Bloom, 2004: 73). A country can create for itself a competitive advantage in growing its economy and improving the lives of its citizens only by understanding the interrelatedness of local and global societies. It is an essential skill required in the modern world, developed only through education.

In spite of the apparent need for globalisation, Smith (2002: n.p.) and Burbules and Torres (2000: 4) agree that it poses a threat to the autonomy of national educational systems and the sovereignty of the nation-state as the ultimate ruler in democratic societies. However, Smith (2002: n.p.) tempers his opinion by stating that it nevertheless appears that national governments still have considerable power to intervene in education systems. For example, the South African government, has in various ways:

- centralised control over what is taught by implementing national curriculum requirements – the National Curriculum Statements – at school level;
- introduced special initiatives (involving direct funding, e.g. university subsidies, SETA grants);
- legislated the registration and accreditation of private providers; and
- instituted other institutional means of control:
 - the establishment of SAQA and the Quality Councils;
 - the registration of national certificates, diplomas and degrees on the NQF which all have to be registered in terms of an outcomes-based approach;
 - retaining the intellectual property rights of all such qualifications. Qualifications are technically owned by the state so that even where a private provider or autonomous body registers a qualification, this becomes the intellectual property of the state (SAQA, 2001b: n.p.⁷) against which the learning programmes of the registering institution are recorded.

⁷ This note is recorded on every qualification and unit standard registered on the National Qualifications Framework: *All qualifications and part qualifications registered on the National Qualifications Framework are public property. Thus the only payment that can be made for them is for service and reproduction. It is illegal to sell this material for profit. If the material is reproduced or quoted, the South African Qualifications Authority (SAQA) should be acknowledged as the source.*

3.3.2 Internationalisation

Studies on internationalisation have mainly focused on the internationalisation of commercial firms and are not well-developed in the educational arena (Flach & Flach, 2010: 25). Internationalisation of education has been defined as the process of bringing an international or intercultural dimension into an academic institution which affects teaching, research, curriculum, student support and service to communities (Lewis and Luker, 2005: n.p.; Kritz, 2006: 6; Wildavsky, 2010: 167). Internationalisation contributes positively to the development of human capital in that it provides for greater opportunities for employment and “fosters economic competitiveness” of a nation (Walsh, 2009: 6). Contributing to this trend is the growing belief that access to knowledge and education is a universal human right (Walsh, 2009: 3). However, it has also led to massive increased demand for education, challenging the capacity of governments to provide such education. The Global Forum on International Quality Assurance, Accreditation and the Recognition of Qualifications (UNESCO, 2007b: 3) debated the question of who would provide higher education on a mass scale in the future. Four years later, the National Planning Commission (2011: 268) echoed this thought.

The following key points were noted by the Forum (UNESCO, 2007b: 3):

Firstly, there is a wide variety of new providers offering higher education programmes using a multiplicity of delivery modes, often making use of innovative and ever-advancing technological developments. It seems that the education market is a lucrative one as “media companies, multinational companies, corporate universities, networks of universities, professional organisations, and IT companies” (*ibid.*) seek to expand their reach and increase their shareholders’ return on investment. The diverse provision by multiple providers is meeting the needs of the market in local and global societies, and has the potential to meet demand by millions of eager young learners mentioned by the National Planning Commission (2011: 268).

Secondly, learners who are more varied in their age, socioeconomic status, motivation, interests and needs, attend such institutions. For example, they may be returning to work after a period of unemployment and need to upgrade their skills or qualifications, or they could be changing to careers, which require new skills or higher qualification (Field, 2006: 88). This ‘lifelong learning’ creates a need for broader access to a more varied range of courses and programmes (*ibid.*: 9). In such a scenario, private providers are more flexible than a public provider in terms of what they offer. The procedures of changing the offerings

by a public provider are lengthy and complicated (Engelbrecht, 2011: email) and they are invariably unable to be as responsive to the market as private providers are.

According to Garton (2010: 7), private provision already accounts for over 30% of education around the globe, and according to Fielden (2010: 10), private provision is already higher education's fastest growing segment worldwide. He predicts that it will soon account for most of the higher education provision in the developing world. For example, it was estimated that 70% of technical education in India is already provided by private providers (UNESCO, 2007b: 3). Table 3.1 reflects this trend.

Table 3.1: Private provision in education

	0 – 10%	>10 – 35%	>35 – <60%	Greater than 60%
Developing countries	Cuba, South Africa	Egypt, Kenya	India, Malaysia	Brazil, Indonesia, Chile, Philippines
Developed countries	Germany, New Zealand	Hungary, United States	(none)	Japan, Mexico, Republic of North Korea

(Source: Altbach, *et. al.*, 2009: xii; Garton, 2010: 7)

Private providers are therefore meeting the needs of learners in all parts of the world.

3.3.3 Regionalisation

Most quality assurance models are based on “national understandings of education systems” (UNESCO, 2007b: 5), leading to quality assurance problems within a region. Although we saw in chapter 2 that “we are not sure of what we mean by quality in higher education” (Farrington, 2005: 53), the globalisation of education has given rise to the development of a number of mainly regional protocols on quality assurance. All these initiatives and strategies aim at improving the quality of education generally within individual countries, and across regions of the world, as well as recognising qualifications earned abroad. The common denominator in all these initiatives is the need for collaboration, co-operation and cross-recognition of qualifications, particularly in the higher education arena, and a basic agreement that quality assurance should conform to the UNESCO Guidelines for Quality Provision in Cross-border Higher Education (UNESCO, 2005c). Nevertheless, wide variations in the key principles espoused by the various quality assurance frameworks still remain (Stellar, 2008: 4) and no absolute standard exists.

This highlights some of the challenges specifically related to quality assurance, accreditation and the recognition of qualifications (UNESCO, 2007a: 2).

It is noteworthy, however, that every qualification registered on the NQF is required to indicate its international comparability. For example, in qualification number 60654: Professional Post-Graduate Qualification: Company Secretarial and Governance Practice (SAQA, 2012d: n.p.), the qualification is compared with and regarded as equivalent to similar qualifications in twelve other countries.

It is clear, therefore, that the NQF takes account of internationalisation, globalisation and regionalisation issues in the registration of qualifications, and that the outworking of this should be that students with registered qualifications should have their credentials recognised anywhere. SAQA (2006: n.p.) states, though, that “recognition of South African qualifications in foreign countries is the prerogative of evaluating agencies in the host countries”. Nevertheless, official statistics indicate that people with qualifications in education, the humanities, the health professions, engineering, architecture, as well as top executive and managerial personnel find a ready market for employment and career opportunities in foreign countries (HSRC, 2004: n.p.). It is problematic to determine how many of these qualifications emanate from public or private institutions, and why, if these qualifications are accepted internationally, articulation between South African institutions has proven to be fraught with difficulty (McGrath, 2003: 93; DHET, 2012: 13). In other words, it is difficult for students to transfer from one institution to another and to move up the NQF scale with due recognition of credits already earned. For example, students with the CSSA professional qualifications are not currently able to get credits for these qualifications towards a B. Com. degree and must start all over again.

These trends in globalisation, internationalisation and regionalisation have generally led to a growing austerity in public post-secondary and tertiary institutions (for example, FET colleges and universities). They are illustrated by overcrowded lecture rooms, outdated library resources, less support for research, deterioration of infrastructure, loss of secure teaching and lecturing positions, and ‘brain drain’ as the most talented staff move abroad or into the more lucrative private sector (Altbach, *et al.*, 2009: xi; Tetty, 2006: 8; CHE, 2011: 12). This is further evidence of the public sector’s incapacity to meet the demand for education. It may be an opportune time for greater consideration of public/private partnerships in education or greater facilitation and encouragement of the establishment of private providers, as mooted by the National Planning Commission (2011: 286, 287).

3.4 MASSIFICATION

There does not seem to be a clear definition of massification in the literature. What is certain is that massification can be viewed as a global phenomenon, resulting from factors such as democratisation of education, the advent of the knowledge economy and globalisation. Gumport, Iannozzi, Shaman, and Zemsky (1997: 2) state that unprecedented growth in education is often characterised by the term ‘massification’. According to Wooldridge (2005: n.p.), the democratisation of higher education, has led to what is called ‘massification’. Massification and universalisation are not synonymous, though they have similar connotations. UNESCO (2011: 6) uses the term “universal” mainly in connection with primary education. Mohamedbhai (2008: vi) simply defines it as “the massive increase of student enrolment”. In this work, it means providing greater access to a broader population driven mainly by political dispensations and philosophies, leading to consequent demands from people who previously had no such access. Governments aid the process by providing financial support to poor students, abolishing fees or assisting them with fees, giving subsidies to educational institutions, regulating the system to ensure open access, and providing adequate support/systems to promote student retention and completion rates. Chapter 1 showed that almost a quarter of the South African national budget is allocated to education annually, both as an attempt to correct the historical legacy and to create a thriving and prosperous economy. Education is, therefore, no longer the preserve of the privileged or the elite.

Misaro, Jonyo and Kariuiki, (2013: 144) maintain that understanding the impact of massification on educational quality in institutions of learning involves a consideration of complex mix of factors, such as the unity of development, standardisation, adaptation, service orientation, and variety. Stakeholder theory takes some prominence in this regard since students, their parents and society are directly or indirectly involved in the evaluation of the quality of university education. Therefore, the authors state that there is a need for continuous monitoring and evaluation of education to ensure quality, leading to enormous changes that impact “the views, purposes, contents, structures, academic standards, functions, forms of establishing education, and management systems” of the educational institutions.

In the developed (first world) countries, massification has been going on for some time, with the proportion of adults with higher educational qualifications in the OECD countries almost doubling between 1975 and 2000, from 22% to 41%. In the late 1990s, massification started

spreading to the developing world, to China and India, for example (Wooldridge, 2005: n.p.). While this may be a political ideal, there are, nevertheless, economic considerations involved in such provision, and accommodating huge numerical growth is proving to be a challenge for most countries. The concept of “education as a public good” again comes under the spotlight – if a country were able to meet the needs of the “masses”, then it would probably be able to provide only the most basic level of education, calling into question the constraint of “quality costs” in that education. The definitions provided in Chapter 2 make it generally clear that quality is defined as fitness for use/consumption/purpose (Harvey, 2012: n.p.; Vlăsceanu, *et al.*, 2007: 71). This implies that a quality product or service must be able to fulfil its purpose. The question that arises is whether a basic level of education is “fit for purpose”.

The African Charter on the Rights and Welfare of the Child (OAU, 2009, Article 11) states that children have a fundamental right to education that addresses their holistic development, which includes mental, spiritual and physical development as well as education for citizenship. In addition, as indicated above, the Constitution of the Republic of South Africa (1996: 1255) states that education should go beyond a basic level to further education, which the state must make available. There is clearly a need for wide access, but, in discussing the successes and failures of initiatives such as Education for All, the United Nations Department of Public Information (2003: n.p.) states that “in the drive to universalize primary education, quality often took a back seat”. Research shows unequivocally that expanding access without ensuring minimally adequate quality is a formula for low efficiency, indicated by the fact that children do not learn effectively, grade repetition is high, and large numbers of students drop out before completing basic education (Aoki, *et al.*, 2002: 256). I would argue that this applies to post-school education as well. Quality is therefore not a luxury that can be ignored until universal coverage has been achieved: development of the two must go hand in hand.

On the positive side, Bundy (2006: 9) states that massification is also a driver of differentiation and efficiency, involving changes to curricula, qualifications, and quality assessment. It requires both greater cost-effectiveness, and that universities should increase their private and external income, for example by the marketing of an institution.

Massification has also had an impact on South Africa. In 1997, the main proposal of the National Council on Higher Education (NCHE) was that South African higher education should be massified (Cloete, 2004: 53) in order to resolve equity issues in education as well

as to provide more high-level skills necessary for economic advancement and prosperity (Daniel, Habib & Southall, 2002: 292). This has had some negative consequences as seen earlier in the discussion on diploma disease and the mass hysteria that accompanies this. One of the contributory factors to the problem was the restructuring of the matriculation examinations in 2008 and a perceived moderation of the standards that allowed many more students to qualify for entrance to degree programmes, although this is denied by Nzimande (Polity.org., 2009: n.p.) For example, in 2011, 24.3% of matriculants obtained a senior certificate with university entrance (Roberts, 2012: n.p.), compared to 13.9% in 2009 and 16.2% in 2006 (Myburgh, 2007: n.p.), an exponential jump for which higher education was not prepared.

In highlighting the issues above, it is clear that massification brings with it a host of problems, not the least of which is the growing demand for education beyond primary or even secondary education. It is also clear that the state does not have the resources to meet the demand, despite the growing education budget, as highlighted in Chapter 1, and in various parts of this chapter. These observations underpin the need for greater consideration of private provision of education, and greater support of private providers from the regulatory authorities (National Planning Commission, 2011: 287).

3.5 MARKETISATION

It is not my intention here to engage in a philosophical debate about whether education should or should not be marketised, but rather to examine the facts of this phenomenon: what it means, why it exists and how it is being played out in the global educational arena.

Marketisation of education has emerged in education as a result of economic rationalism, also referred to as neo-liberalism (Lynch, 2006: 1; Ryan, 2008: 740; Sauntson & Morrish, 2010: 73). Economic rationalism has been adopted by governments since the early 1980s in an attempt to eradicate inefficiencies in state-funded institutions (Sauntson & Morrish, 2010: 73), and become more competitive in the face of globalisation. Freedman (2011: n.p.) points to “the logic of the market and the transformation of education into a commodity determined by economic imperatives, consumer choice and a utilitarian logic”. Smith (2002: n.p.), however, has a negative view of the trend towards marketisation, saying that “governments have fallen prey to market forces and the resultant commodification and the corporate takeover of education”. The process of commodification involves the development of attempts to standardise products (in this case I would define these as programmes and

courses) and to find economies of scale. It also requires audits, review of practice and peer evaluation in order to ensure that standards are being maintained (Sauntson & Morrish, 2010: 73) thereby laying a foundation for quality assurance.

Again, the philosophy and the arguments for and against the phenomenon of marketisation are not germane to this thesis, but it needs to acknowledge the marketisation of public institutions. For example, “universities are changing to become more closely engaged with the business and industry sectors of society, working in new ways and in new constellations to meet demands from the public and from society” (Wedlin, 2008: 146). They are becoming competitive entities, competing with each other as well as with other ‘knowledge organisations’ for resources, reputation, students and status (Taylor & Judson, 2011: 110). This is key to the provider’s success as students compare university rankings to see which institution would give them better-regarded credentials and the best stepping stone to get into the job market. Universities, indeed, invite them to do so, proudly boasting of their rankings with headlines such as “UCT climbs 21 spots in world rankings” (SA Good News, 2008: n.p.) or “MBA Ranking 2011: The Lowdown on MBA's in South Africa” (MBA Network, 2011: n.p.).

Foskett and Lumby (2003: 89) state that, while there is no universal definition of the term ‘marketisation’, it can be seen as “a change in the socio-economic and cultural environment of schools and colleges that increases the role of choice or market, requiring them to be more responsive to the external environment”. It has come about because of the “pursuit of national economic competitiveness in global markets” (*ibid.*) requiring a more highly skilled labour force and the development of human capital as discussed earlier. This implies the use of market-type mechanisms such as privatisation, outsourcing and tendering, using performance measurements to evaluate delivery, and the application of quality assurance techniques to deal with public education’s exposed inefficiencies (Van Thiel & Leeuw, 2002: 268). The need for this kind of intervention grows as public educational institutions increasingly fail to deliver on their mandate. In support of the last sentence, the following three statistics relating to public education in South Africa are indicative of the problem:

- Literacy and numeracy levels achieved in the 2011 Annual National Assessments by Grade 3 learners, with only 12% performing adequately in the numeracy tests while 31% of learners performed adequately on the literacy tests (Department of Basic Education, 2011: 8).

- Matric pass rate for 2011 of 70.2% (SABC, 2012: n.p.) compared to IEB Matric pass rate for 2011 of 98.15% (Oberholzer, 2012: n.p.) (Note: the IEB examinations are written mainly by learners in private schools).
- University throughput rate of 15% (Letseka & Maile, 2008: 1) – this means those students who complete their undergraduate degrees without failing a year or dropping out.

The reasons for these statistical indictments include inter alia the legacy of apartheid, under-resourcing, lack of teacher training, lack of managerial experience of school principals, and teenage pregnancy, to name but a few. Clearly, they preclude any reasonable suggestion that this is evidence of good quality in public education in this country, despite the billions of rands allocated to education each year. However, the academic performance of students in Private Institutions of Higher Education (PIHEs) in Africa is generally better than those in public universities, despite having a lower-level academic profile (Varghese 2006: 43). What makes the difference? It is certainly evident that private educational institutions apply business management theories and models, such as stakeholder theory and quality assurance models in their enterprise strategies. The question that arises in this regard is whether the application of commercial business models and theories in education enhances quality. Despite the fact that ‘managerialism’ is not always welcomed by the academic world (Deem, Hillyard & Reed, 2007: 5), the application of managerial approaches has been found to enhance economy, effectiveness and efficiency at least in terms of delivery of educational services (McNay, 2006: 186; Nunan, 2008: 862) although there is some doubt about the equity of these approaches.

Despite an undoubtedly significant impact on public education, marketisation is not really relevant for the current research, except to the extent that public institutions find themselves in competition with private providers, which are businesses operating within a specific or niche market (National Planning Commission, 2011: 291). There is evidence that, in terms of quality assurance, markets are more dubious, fraught with fraudulent practices such as relaxation of admission rules, distortion of the evaluation process and various methods of faking examinations (Fielden & Varghese, 2009: 71). This undoubtedly affects perceptions about private providers. Nevertheless, the literature on marketisation raises certain key issues, which are all important considerations in the current research, such as effectiveness, efficiency and equity.

3.6 EFFECTIVENESS AND EFFICIENCY IN EDUCATION

The Green Paper on Higher Education Transformation (Department of Education, 1996: n.p.) highlights the fact that effectiveness and efficiency are interrelated.

An effective system achieves desired outcomes and objectives. It does “the right things in terms of a given framework of expectations” (Department of Education, 1996: 5), while an efficient system or institution is one which works well, and makes optimal use of the resources available to it (*ibid.*).

Crucially, the system must be both affordable and sustainable. Aoki, *et al.* (2002: 255) emphasise the importance of making maximum use of the private sector when trying to expand access to education cost-effectively. The employment of professional managers, competition between providers in what they can offer students, and their efforts to maximise their stakeholders’ return on investment, bringing leaner and more efficient use of resources, all point to cost-effectiveness. This goes hand-in-hand with efficiency, which, in simple terms, means “achieving the desired goals of education at lower cost, or achieving more of those goals without increasing costs” (Chapman, 2002: 20). Obviously, this should not jeopardise quality. Latchem (2011: 9) states that the cost/benefits of “bureaucracy, paperwork, time and additional costs of external and/or internal QA” need to be assessed in order to ensure efficient use of resources.

The problem with affordability and sustainability measures is finding a suitable benchmark for quality because “we are not sure of what we mean by quality in [...] education” (Farrington, 2005: 53). This is a crucial issue in terms of this thesis. It is essential to determine what quality is before we can determine whether tuition providers meet the required standards. In Chapter 2, certain key definitions were provided such as fitness-for-purpose (effectiveness) and value for money (efficiency). These are two suitable benchmarks for this analysis.

“Fitness for purpose refers to the ability of institutions to discharge their responsibilities in relation to their missions” (CHE, 2011: 12). It considers “the specific combination of an institution’s aspirations, areas of specialisation, approach and focus in relation to the core functions, available resources, location, local, regional and international relationships, as well as student and staff profiles and their fit with the institutional mission” (*ibid.*). Value for money means balancing the costs of investments against perceived and actual benefits of those investments, whether by the state, or the students themselves (CHE, 2011: 13). This is

a measurable dimension, which is relatively easy to assess given the availability of statistical models on efficiency and effectiveness that have been well tested in many studies.

Levin (2001: 55, 56) says that there are persistent concerns about the efficiency of educational spending, and proposes that a cost-effectiveness analysis should be done to enable measures of learning, as well as other appropriate indicators to be used to assess educational outcomes relative to costs. Unfortunately, according to Schiefelbein and Wolff (2007: 3), current knowledge about cost-effectiveness in education (worldwide) is still grossly inadequate, especially considering the huge amounts of money expended. American and European literature contains the majority of information and research available, with only minimal reference to South Africa, especially with regard to the private provider (Fehnel, 2006: 239). Whether these institutions can or do compete with public institutions in terms of efficiency is a critical issue.

Woessman and Schuetz (2006: 2) state that there are two main aspects of efficiency, namely “allocative efficiency” and “technical efficiency”. Allocative efficiency means “choosing the most efficient input mix” of resources, for example, human resources and technological resources, while technical efficiency is about “making the best use of each given input”. A provider might thus look at teacher/student ratios or the qualifications of lecturers and the fees that have to be paid to people with better or higher qualifications, and would have to balance this with the kinds of outputs they seek, such as good throughput rates or employability of their students once they have qualified. The point about efficiency is that it must be measurable. For instance, would be a cause for concern about efficiency if a provider sets a target of a 55% throughput rate and achieves only 50%; or the time taken on consultations or the amount of support would need to be reassessed if a provider budget for the level of student support is being exceeded.

The argument for efficiency (Barr, 2000: 38) stipulates that participants are well-informed and all relevant stakeholders – students, employers, providers and government – have an influence on outcomes.

In an efficient system, students pay part of the costs for their qualification from obligatory fees, and are, therefore, better able to demand greater variation in what providers provide. Students will make choices about which institution they want to attend, about the type and level of course they follow, whether their studies should be done part-time or full-time, the

mode of study (distance learning or face-to-face), the structure of the qualification they want to pursue, and whether they will study for a whole qualification or take a short course.

An efficient system would produce employable students who meet the needs of employers, who, in their turn, influence outcomes indirectly through their choice of employees with specific kinds of qualifications. They can also have a direct influence through negotiation about course content. For example, professional bodies such as the South African Institute of Chartered Accountants (SAICA), the South African Institute of Professional Accountants (SAIPA) and Chartered Secretaries Southern Africa (CSSA) already give partial exemption from professional examinations to graduates of courses, which take account of the needs of those professional bodies. In essence, employers are also stakeholders who have been consulted in the past regarding what should be in a qualification. The National Standards Bodies established by SAQA when the NQF was first set up, involved employer organisations (NQF, 2000: 10). In the new QCTO model, this arrangement is meant to continue with the so-called scoping meetings which must be held with all stakeholders in an industry developing the qualifications (QCTO, 2011a: 10). The DHET (2012: ix) has also acknowledged the need for consultation with organised business and organised labour.

Education providers also have a role to play in ensuring efficiency and do so by responding to changes in the pattern of demand with flexibility that would be impossible within a centrally-planned funding mechanism. Institutions have to be free to determine price (i.e. the tuition fees they charge), quantity (i.e. the number of students they accept), and quality, which refers to the types of courses they offer and the support that underpins this such as the qualifications and ability of the teaching staff and counselling skills. This would be consequent to the terms of each provider's own business plan, budgets, availability of facilities, and staffing, which are quality assurance requirements of the various regulatory bodies (Hayward, 2006: 22). Finally, government retains a major influence in that it has a direct role in financing education annually from the fiscus, as well as providing loan funding to students via the National Student Financial Aid Scheme (NSFAS). The National Planning Commission (2011: 292) recommends funding consideration for students enrolling with accredited private providers. A system of incentives might play a role. For example, the government could provide more generous and flexible funding for institutions that have better completion rates, or who produce more readily employable students as a consequence of quality education. The National Planning Commission (*ibid.*) suggests that a national graduate tracking system should be "considered as a proxy for quality".

Quality assurance is also the domain of government. Part of the task is to ensure that regulation is in place and enforced. An efficient system would do this with minimal cost and optimal benefits. The National Planning Commission (2011: 292) states that a minimalist system of quality control would simply require providers to publish timely and accurate performance data on their websites. For example, these could highlight the destination of recent graduates, which would give prospective students the information they need when choosing an institution to attend. A quality audit of the information would ensure that the provider is held accountable for what it publishes. This would also help to alleviate the dearth of articulation between qualifications and institutions, which has dogged education ever since the NQF was first established.

According to Barr and Crawford (2005: 204), the efficiency factors discussed above would appear to provide for a more equitable system in the following ways:

- It improves targeting, since a move from tax funding towards loans, particularly in post-school education, reduces the subsidy and makes it available to those who need it most. Targeting, in turn, frees up resources to promote access more directly and powerfully than measures which spread subsidies more indiscriminately across the student population.
- It enables alternatives, including:
 - scholarships for deserving and capable disadvantaged people who would probably require a smaller loan or no loan as they would be less likely to fail; and
 - loan funding for all students, full-time and part-time, undergraduate and postgraduate, in further education and higher education.

Efficiency facilitates greater access to education that does not discriminate on the basis of class, race, gender, or financial means.

3.7 EQUITY IN EDUCATION

Transformation lies at the heart of creating an equitable system and is regarded as an essential criterion for quality assurance. According to the CHE (2011: 14) the focus of higher education reform internationally has been “the achievement of a closer fit between societal needs and goals, and the work of HEIs with due regard to academic freedom and institutional autonomy”. In the area of higher education, transformation has meant a focus on equity and access (CHE 2011: 13) with a spin-off into employment equity although the desired levels of equity remain elusive. Perhaps part of the problem is weak linkages between colleges and the

workplace at the FET Level (National Planning Commission, 2011: 271), and a curriculum that does not meet society's needs (National Planning Commission, 2011: 272; OECD, 2006: 9) at the HET level.

In the discussion of marketisation it was pointed out that equity is potentially problematic if one applies managerial philosophy and practices to providing educational services. However, consideration of equity is implicit in any discussion of education. This is particularly relevant in the context of South Africa because of the pre-1994 policy of racial preference for whites in every sphere of society.

In the educational arena, laws entrenching inequality included:

- the Bantu Education Act of 1953 which institutionalised segregation in schools;
- the Extension of University Education Act of 1959 which created separate universities for the 'non-white' population; and
- The Advanced Technical Education Act of 1967, which created racially separate Technical Colleges (upgraded to technikons in 1979).

This legislation brought into being a system that denied black people access to the same educational opportunities and resources as white South Africans, and, by 1980, the establishment of universities and technikons specifically for various race groups divided higher education in South Africa along definite racial lines (Fehnel, 2006: 346). For example, the University of the Western Cape was a so-called "coloured" university while the University of Cape Town was reserved for "whites only". In Durban, the M L Sultan Technikon was an "Indian" college, while the Natal Technikon was a "white" college. Similar structures were established in all four pre-1994 provinces of South Africa.

The educational divide was one of the first issues tackled after the elections in 1994. In addition to the adoption of a new Constitution in 1996, the key actions included the following:

- the creation of the National Commission on Higher Education with the task of developing a vision for a new higher education system in 1995;
- the adoption of the National Qualifications Framework (1995);

- the adoption of the Technikon Act of 1995 that permitted technikons to award degrees in addition to diplomas; and
- the adoption of the Higher Education White Paper (1997) and the Higher Education Act of 1997.

As public higher education opened its doors to all races, concurrent legislation made provision for the establishment of PHEIs, in terms of the Higher Education Act, 101 of 1997. The Constitution [Article 29 (3)] allows for private higher education institutions to operate at their own expense, on the following conditions: that they do not discriminate on the basis of race; are registered by the Registrar of Private Higher Education Institutions; and that they maintain standards which are as good as, or better than those at public universities and technikons. The office of the Registrar of Private Higher Education Institutions came into operation in December 1997, with the obligation to protect the public and act as a watchdog over private higher education institutions operating in South Africa (Higher Education Act, 1997, Section 53).

Registration entails accreditation by an Education and Training Quality Assurer (ETQA) operating under the auspices of the South African Qualification Authority (SAQA). Accreditation implies that the tuition provider meets the minimum quality requirements, and provides a stamp of approval that assures learners that they will receive value for money and a good education if they register with that provider.

3.7.1 Participation Rates and Equity

Post 1994, transformation of the education system was high on the political agenda. The cornerstones of higher education policy formulated in the mid-1990s in South Africa were equity, efficiency, responsiveness and co-operative governance (Fehnel, 2006: 238). The policy of equity gave open access to all higher educational institutions for all race groups and led to massive shifts in the student populations of all the universities and technikons. However, this was more a case of “fish changing streams” where students who would have attended a “traditionally black” institution now enrolled at a “traditionally white” institution, and there was what is called the “white flight” (Cloete, 2006: 417) or disengagement (Mandew, 2003: 74) as white students, for various reasons, left public higher education in their thousands. According to Breier and le Roux (2012: n.p.), there was a 22% decline in “white” student numbers from 1994 – 2009 (a reduction of approximately 52000 students). The CHE (2009: 20) notes a worrying trend in the decreasing numbers of white students

enrolling at public tertiary institutions. Their destinations are unclear. According to Mandew (2003: 74), there has been much uncorroborated speculation as to the reasons or motives for this disengagement. It has been described as “crowding out”, or “the inevitable minoritisation of previously artificial majorities” (*ibid.*). Fiske and Ladd (2005: 211) state that “No one seems to have a firm fix on the causes of this white flight. Various theories hold that white students who in the past would have enrolled in higher education either entered the work force, left the country, or enrolled in the growing private higher education sector”.

However, the participation rate is still unequal: for white students it is between 54% and 58% (CHE, 2009b: 19; Breier & Le Roux, 2012: n.p.); for Indian students it is 51% (Breier & Le Roux, 2012: n.p.), while for African and Coloured students, it sits between 13% and 14.3% (National Planning Commission, 2011: 274; Breier & Le Roux, 2012: n.p.). The participation rate is calculated by “dividing total enrolments by the total population aged between 20 and 24 and expressing this fraction as a percentage” (Breier & Le Roux, 2012: n.p.). It should not be confused with “head count enrolments”. In other words, between 54 and 58 out of every 100 White students take advantage of higher education opportunities, while only 13 out of every 100 African and Coloured students do.

To explain this further, the following calculations are provided:

Table 3.2: Enrolments and participation rates per population group

Years	African		Coloured		Indian		White	
	E	PR	E	PR	E	PR	E	PR
1994	287 137	11.4	39031	11.6	36 828	38.1	230 378	58.5
2010	595 963	13.1	58 219	14.3	54 537	51.2	178 346	58.5
% change	107%	0.7	33%	3.3	33%	13.1	- 23%	0

Key E = Enrolments PR = Participation Rate

(Source: adapted from Breier & Le Roux, 2012: n.p.; DHET, 2012: 38)

In 2011, the total headcount in public universities was 899 120 (DHET, 2012: 37) reflecting an overall participation rate of 17% (National Planning Commission: 2011: 273). It is unclear whether this includes students enrolled with private providers. Breier and Le Roux (2012: n.p.) state that in 2009, if enrolments at private colleges were taken into account, the overall participation rate would be 17,9%, so it seems unlikely that the National Planning Commission tally includes private providers. This inequality in access is caused by the fact that students from disadvantaged backgrounds cannot afford the fees at tertiary institutions,

or that they do not have the prerequisite educational qualifications (Woessman & Schuetz, 2006: 26).

In 2010, there were 81 596 enrolments in PHEIs (Badsha & Cloete, 2011: 11) compared with 899 120 enrolments at Public HEIs (DHET, 2012: 37). The proportion of students studying at PHEIs is therefore about 9%. Where would these students study if the private providers were not in existence? We noted that public universities cannot accommodate or cater for all the students who apply. This clearly indicates that the role of the private provider is an important one in terms of the overall provision of education in South Africa.

The DHET (2012: x) comments that “the system continues to produce and reproduce gender, class, racial and other inequalities with regard to access to educational opportunities and success”. This seems to be in contradistinction to the findings of the CHE (2009: 22), which found that, in terms of gender equity, the percentage of women enrolled in public universities reached 55.5% (by comparison, an estimated 52% of the population are women (Statistics SA, 2011: 2). In this regard therefore, gender equity is acceptable at one level. Delving deeper, though, it has been found that women are over-represented in certain fields of study such as health and language studies, and under-represented in others such as science, engineering and technology (CHE, 2009b: 23), which means that there is still some gender inequity, the reasons for which are not relevant to this thesis.

In the private HET sector, from 2003 up to now, (later figures do not seem to be available), according to Akoojee and McGrath (2003: 27), the racial profile was approximately 46% African, Coloured and Indian 20% combined and 34% white. In 2009 (Blom, 2011: 35), in the private FET sector, 81% of students were African, 6% were Coloured, 3% were Indian and 10% were White. The private FET sector appears, therefore, to reflect almost perfect racial equity in terms of the population groups in South Africa⁸.

The unequal access to higher education between different racial groups raises the question: is race or gender discrimination an issue in private education and training? Accredited tuition providers are specifically forbidden by legislation from discrimination on the basis of race or gender, and, on my site visits as the Accreditation Manager of Chartered Secretaries Southern Africa (CSSA) to many of these tuition providers, I have not noted any discriminatory practices.

⁸ The 2011 census showed that the population is made up as follows: African 79,2%; Coloured 8,9%, Indian/Asian 2,6% and White 8,9% (Statistics SA, 2012: 3).

3.7.2 Legitimate Discriminatory Factors

The only real discriminatory factors appear to be academic, financial and geographical.

3.7.2.1 Academic factors

Boughey (2010: n.p.) comments that “most institutions understand the ability to succeed in higher education to be dependent on attributes innate to the individual – students need talent, potential, intelligence, motivation, aptitude and so on”. This is not so much a matter of nefarious, deliberate and unwarranted discrimination but is, in fact, determined by the National Qualifications Framework. For example, a person wanting to study for a particular qualification must meet prerequisite requirements laid down in the qualifications as registered on the National Qualifications Framework. This helps to ensure that students have a reasonable chance of success, and indeed, it would be unethical to enrol students and accept fees if they do not possess the wherewithal to meet the rigours of higher education. Despite this, there have been instances of unethical practices by providers attempting to enrol ineligible students who do not meet the academic entrance requirements, a consequence of usury (the “profit motive”), or the way in which courses are sold by call centre staff or student advisers operating on a commission system (Breneman, 2006: 88).

3.7.2.2 Financial factors

Much of current discrimination in private education lies in “social class” rather than race, meaning that it comes down to “money” or who can afford to pay. UNESCO (2007a: 4) found that a viewpoint held by stakeholders in many countries is that zero or low tuition fees promote a broader socio-economic student profile. However, the view is contradicted by research, which reflects that access to higher education is generally most equitable when a flexible fee regime is in place: a combination of fees for those who can afford them, with bursary and loan funds for poorer students (Vossensteyn & Matějů, 2007: 20; Vandenberghe, 2007: 2; Denny, 2011: 2; Haupt, Krieger & Lange, 2011: 17). This contributes to an equitable system in both the public and private sectors, allowing the joint efforts of the state and private investors to more comprehensively satisfy the need for higher education. It is clear that the state is not able to fund the entire tertiary education system from the fiscus. Thus, public funds need to be supplemented by private funds (Barr, 2000: 37). This is not to say that a private provider can charge whatever it wants – that surely would lead to accusations of profiteering (Hill, 2006: 17; Kapur and Mehta, 2006: 30). Therefore,

affordability must be a consideration for a private provider in order for it to survive in the market. There are various ways to fund education and training besides students or parents paying out of their own pocket. For example, there are alternative funding sources such as “private or external study bursaries (which) are available from South African companies to capable students on a yearly basis” (Hammond, 2012: n.p.; Careers Portal, 2012: n.p.). Furthermore, PHEIs are obliged in terms of the HEQC accreditation criteria to indicate their level of community engagement, and some providers therefore make bursaries available to students (PC Training and Business College, 2012: n.p.; Chartered Secretaries Southern Africa, 2012: n.p.).

There is a misconception that private providers discriminate against academically or financially disadvantaged students. According to Altbach, *et al.* (2009: 86) and Bjarnason, *et al.* (2009: 18) for-profit providers are generally not elite institutions, and may in fact be “demand absorbing” entities (Hentschke, Lechuga, & Tierney, 2010: 163), providing places for students who are not otherwise able or willing to access public post-school education.

The National Planning Commission (2011: 292) suggests that the National Skills Fund should provide access to loans for students studying at not-for-profit private providers, and even to other registered providers, should resources permit this. Currently (2013) this funding is available only to students at public institutions.

Barr (2000: 38) suggests a funding formula that involves private institutions, the state and all the various stakeholders. This means that the state should provide as much as it can in the way of funding and infrastructure, and if individuals desire more than this, then they should pay according to fees determined by the provider.

One of the recent issues making this arrangement less than ideal is access that private providers have access to government funding such as grant funding from the SETAs, which is paid out of the Skills Development Levies managed by these ETQAs, or tenders for staff training. The Minister of Higher Education and Training, Blade Nzimande (Polityorg.za, 2011: n.p.), is reported as saying “an unintended consequence of the establishment of a Sector Education and Training Authorities system was the generation of an industry of short courses, which were ‘easy money’ for consultants”. The Minister makes it clear that he is not in favour of this model, and is quoted as saying, “South Africa has invested a lot of its skills levy fund on short courses which are of dubious value”. Although he did not advocate the scrapping of short courses, he said that there was a need to strike a balance (Polityorg.za,

2011: n.p.). This has led to fear among the private providers, particularly the SMMEs, that their livelihoods are being threatened (Freeman, 2010: n.p.).

In the absence of state funding, private providers are compelled to charge fees, irrespective of whether they are for-profit or not-for-profit organisations. Nonetheless, post-school education conducted for profit is still an unpalatable concept to some people (Goldman, Gates, Goldman, Brewer & Brewer, 2002: 150; Washburn, 2005: 221). Altbach, *et al.* (2009: 87) state that “some critics have argued that forcing greater emphasis on revenue-generating activities creates general problems for the traditional roles of higher education, with a negative impact on both teaching and research”. Akoojee (2005: vii) states that the idea of private, for-profit providers is “antithetical” to notions of redress of past inequities in the South African context, with the private sector being regarded as a “necessary evil” that has to be tolerated in order to fill the gaps in the public sector (Bjarnason, Cheng, Fielden, Lemaitre, Levy, & Varghese, 2009: 51).

These criticisms aside, businesses generally, including private providers of education, are deeply concerned with the quality of their services or products as a way of creating competitive advantage in the marketplace (Porter, 2008: 75). In fact, in assessing accreditation applications, some Sectoral Education and Training Authorities (SETAs) such as FASSET, ask if the organisation has had an external audit done in terms of a system such as ISO 9001 (FASSET, 2008: 9). Other quality assurance systems would include the Balanced Score Card (Kaplan & Norton, 1996) and the Six-Sigma approach developed by Motorola in 1986 and widely used in many industries (Motorola University, n.d.: n.p.).

The question that remains is why someone would want to pay a private provider for their education, when public institution fees are ostensibly lower, access to funding is easier (via the NSFAS scheme, for instance), and the range of programme offerings is wider.

3.7.2.3 Geographical factors

In terms of geographical access, the problem is that most private institutions are limited to large urban centres, with the exception of very large providers like Educor or Varsity College, and non-governmental organisations that operate in rural and undeveloped communities. Nzimande is reported as saying that “(This) does contribute to the perception that such location only serves to privilege service providers over beneficiaries” (IOL News, 2011: n.p.). However, some of the larger private providers offer distance learning, which

goes some way to ameliorating the problem, despite the fact that this mode of provision has its own distinct challenges.

In conclusion, it seems that there is open access to private institutions except for the limitations outlined above.

3.8 HUMAN CAPITAL THEORY

Mankiw (2012: 399) defines human capital as “the accumulation of investments in people” of which the most important is education. Livingston (1997: 9) states that “the core thesis of human capital theory is that people’s learning capacities are comparable to other natural resources involved in the production process; when the resource is effectively exploited the results are profitable both for the enterprise and for society as a whole”. He notes that there are three schools of thought about what contributes to the development of human capital. These are: better and more schooling; life-long learning; and greater economic benefits for people who are more highly educated. Apparently, South African authorities agree with all three approaches to some extent (SAQA, 2008b: 26; DHET, 2012: 44; Lolwana, 2008: 3) as they strive to provide the skills needed by a fledgling democratic economy.

The problem is that in spite of a growing demand for education, the quality of education is not keeping pace. We see low throughput rates (National Planning Commission, 2011: 276; DHET, 2012: 47), a lack of available skills to meet the demands of the economy (DHET, 2011: 6) and under-qualified teaching and lecturing staff (*ibid.*: 8). The so-called “brain-drain” or flight of skilled professionals to developed countries has exacerbated the problem (Mattes & Mniki, 2007: 19).

3.8.1 Public and Private Benefits of Human Capital Development

In spite of the pressing problems mentioned in the previous paragraph, the discussion below reveals that both educated individuals and society as a whole benefit from HCD.

The private benefits for individuals include greater prospects of employment, and higher incomes, which in turn contribute to greater ability to save and invest for future needs such as education for children and retirement (Bloom, Canning & Chan, 2005: 16; OECD, 2009: 40). Education and skills enhance self-esteem, confidence, and positive attitudes, all of which have beneficial spinoffs. The fact that education has a positive effect on lifetime earnings and occupation helps to explain increases in the demand for higher education as well as

individual choice of occupation. In addition, tertiary education improves the ability of people to adapt to, and benefit from, fast-paced and ever-changing technological developments that epitomise the knowledge and information network economy. This is crucial if Africa is to achieve the economic growth required to tackle pervasive poverty and inequality (Aoki, *et al.*, 2002: 243; Bloom, *et al.* 2005: 16).

The OECD (2009: 42) states that a lack of education contributes to the growing unemployment rates. It follows, therefore, that the employment prospects are better for the educated people than for the uneducated (Mankiw, 2012: 399). In addition, the rate of employment increases as people's levels of education rise. For example, graduates with a tertiary qualification are more likely to be employed than high school leavers. However, Borat (2004: 17) observed that there is an increasing graduate unemployment problem in South Africa, and noted that having a tertiary qualification no longer guarantees employment.

When people are educated, they receive a rate of return on their investment that over time cancels out costs of that investment, such as tuition fees and loss of earnings while studying (OECD, 2009: 44; Heise & Meyer, 2004: 367). This provides an incentive for them to invest in education. The OECD study found that the individual rate of return to those with a post-school non-tertiary education ranged from 5% to 18%, while for a tertiary education, on average, across 19 OECD countries, the individual rate of return was between 11% and 12%. The public rate of return was between 6 and 11%, depending on whether education was undertaken in early adulthood or in later years of life (OECD, 2009: 44). Although they do not provide any percentages for rates of return, Gustaffson and Mabogoane (2010: 6) posit that the rate of return for South Africans sharply increases for people with a senior certificate because they are more likely to find employment than those without a senior certificate. The stark fact is that 60% of young South African adults have no qualification at all (Gustaffson & Mabogoane, 2010: 6), which contributes to the high unemployment rate⁹.

3.8.2 Societal Benefits of Human Capital Development

Societal benefits also result from the development of human capital (OECD, 2009: 46). According to Le Roux (2009: 2), "insufficient investment in an economy means sub-optimal economic growth, sub-optimal job creation and inferior overall living standards relative to nations with a better savings performance". The benefits of public investment in education are higher when people complete tertiary rather than upper secondary education (Miller &

⁹ In November 2012, the unemployment rate stood at 25.5% (Statistics South Africa, 2012b: n.p.)

Torr, 2003: 15; Creţan & Lacrois, 2008: 136). Because people generally earn more when they have higher levels of education, they provide the state with greater tax revenues, and there is a greater level of savings and investment, which leads to “a more entrepreneurial and civic society” (Borode, 2011: 149). Investment in education can also contribute to:

- a reduction in population growth, improvements in technology, and better governance (Bloom, *et al.*, 2005: 16);
- reduction in crime rates (Lochner, 2010: 3);
- improvements in health and life expectancy (Lochner, 2010: 34; Heise & Meyer, 2004: 366; Bloom, *et al.*, 2005: 16);
- encouragement of democracy (Lochner, 2010: 61); and
- economic benefits for the employer (Lafleur & Bloom, 1999: 5; Dimov & Shepherd, 2003: 17).

A more educated population brings with it benefits that affect individuals, communities and society as a whole. However, where opportunities for education are limited, particularly in terms of provision, these benefits cannot be fully realised. The opportunity for people to gain an education is directly correlated with the number of providers. At the risk of being repetitive, it is clear that private providers make a significant and positive contribution to human capital development.

3.9 ECONOMIC BENEFITS OF EDUCATION

In this section, the focus is on the economic benefits of education as opposed to economic theories such as human capital (Patrinos & Psacharopoulos, 2011), growth accounting, economic growth (Hanushek & Woessmann, 2008: 657), and the return on investment which are well documented and have formed the basis of many empirical studies. Most of these studies provide complex statistical analyses for their findings. The findings themselves are important for this research, rather than how they were arrived at.

Education economics is the study of economic issues relating to education, such as the demand for and supply of education as well as the financing and provision thereof. In considering the contribution of the private provider to education, there are several aspects to consider, namely:

- the contribution of education to economic growth;

- the measurement of educational costs and expenditures;
- the balance between different types and levels of education; and
- problems of finance and planning.

Both the belief that investment in education generates growth, and the increased demand for education globally, have made it necessary for governments to make detailed projections of the future scale of the education system (UNESCO, 2005a: 41). In South Africa, the quintennial National Skills Development Strategies, Sector Skills plans, workplace skills plans, and the National Development Plan: Vision for 2030, are examples of how such projections are made.

The National Planning Commission (2011: 268, 270) also suggests that there is a need for an enabling regulatory environment which will assist the establishment and development of providers to meet the burgeoning needs for education among the South African population. Given that the National Planning Commission (2011: 271) has indicated that public institutions cater for only around 300000 students currently, but that there are millions of young people eager to learn, it becomes obvious that the offerings of private providers could contribute significantly to meeting the need. McGregor (2011: n.p.) makes an interesting observation of what is happening in Brazil where the attitude of the authorities is that “low quality private higher education is better than none at all, in circumstances where public systems cannot meet soaring student demand”. Rather than a Utopian approach to quality assurance where the ideal is that all providers are expected to offer top quality training and education, a more pragmatic approach is called, where the state provides “effective and enabling regulation” (National Planning Commission, 2011: 268). Currently, the South African “regulatory system does not support the development of institutions” (*ibid.*). In other words, the state should be helping providers to become established rather than placing barriers in their way by means of complicated, complex and onerous regulations with which micro-providers, in particular, find it difficult to comply (SAQA, 2004: 7). This would encourage more providers to become accredited, thereby enhancing the quality assurance regime and allowing for greater protection for students who are often exploited by unaccredited providers.

The National Development Plan: Vision for 2030 sets targets for various aspects of education and training, citing progress since 1994 as the starting point (National Planning Commission, 2011: 268-278). Although the document is somewhat flawed in that the basis for comparison

is not always the same (for example, the base year is not 1994 in every case; some statistics are missing; some are given in percentages and others in numerals; some statements are qualitative), it is at least a starting point.

The second question relates to the capacity of South Africa to reach the goals and achieve the vision, which is the crucial challenge. The years since 1994 have been plagued by wasteful expenditure on:

- schemes and systems that have failed to provide the skills that the nation requires (*ibid.*: 271);
- a qualifications framework that has proven to be complex, difficult to understand and unable to cater for flexible articulation (*ibid.*: 271); and
- funding of students to study at FET colleges and universities with poor throughput rates and high dropout rates (*ibid.*: 273). Aoki, *et al.* (2002: 251) point out that, in many cases, unit costs of education (particularly in Africa) are high and yet learning outcomes and completion rates are low, indicating that the overriding problem is system inefficiency. The three main causes of low efficiency are: an input mix that does not support learning, high repetition rates, and inefficient management.

In addition, there is an ever-shrinking fiscus (Naidoo & Veriava, 2004: 76; Gray, 2009: 56) exacerbated by:

- the high rate of unemployment at 25.5% during the third quarter of 2012 according to Statistics South Africa, (2012b: n.p.), meaning lower revenues from taxes (Buthelezi, 2011: n.p.); and
- ongoing and costly corruption (Davis, 2011: n.p.; Mkhize, in Politicsweb, 2011: n.p.) accompanied by mismanagement (Vollgraaff, 2011: n.p.), a system of patronage and inappropriate allocation of funding to private providers (Kgosana, 2011: n.p.).

How will education meet the targets set by the National Planning Commission? The answer, I believe, lies partly in a more efficient use of resources, and in “leveraging the skills and comparative advantage of the public and non-state sectors in a way that enhances the extent and quality of service delivery” (LaRocque & Lee, 2010: v).

3.10 THE DRIVE TOWARDS PRIVATISATION

The discussion thus far has shown that there is a place and a valuable role for the private provider in post-school education in South Africa. It is, therefore, important that this concept is discussed in depth as this will form a platform for the field research.

3.10.1 THE MEANING OF PRIVATISATION

According to Belfield and Levin (2002: 19) privatisation means “the transfer of activities, assets and responsibilities from government/public institutions and organisations to private individuals and agencies”. Global protest from academia, trade unions, and students sees privatisation as a move towards elitism in post-school education, created by the marketisation of education (Gupta, 2006: 2; Chitty, 2009: 80). To avoid being distracted by peripheral arguments, it is important that the current research eschews ideological or philosophical perspectives or adopting a stance of pro- or anti-privatisation. We examine privatisation from the specific perspective that it is a growing reality of the educational landscape across the globe (Kruss, 2007: 137; LaRocque, 2007: 11; Hahn, 2008: 3; Levy, 2009: 12; Fielden, 2010: 10).

According to Belfield and Levin (2002: 9), privatisation generally takes three forms:

- Private provision: education can be provided by private organisations, for example, privately owned and managed schools, colleges, or universities;
- Private funding: education can be funded by individuals and organisations in the private sector rather than through government subsidies. Examples include endowments, trusts or private investment and sponsorships (Ball, 2007: 8, 147).
- Private regulation: education services can be monitored and quality assured by those who receive the services directly, that is, the so-called beneficiaries of the service such as parents or students; as opposed to being regulated and monitored by government agencies. This is a notable departure from the norm of government control, frameworks, accountability and external quality assurance demands.

A general overview of the debate about privatisation (Belfield & Levin, 2002: 9; Zadjia, 2006: 63; Adeyamo & Salami, 2008: 409; Uwakwe, Falaye, Emunemu & Adelore, 2008: 165; Kotecha, 2010: 11) shows that the increase in privatisation can be ascribed to the following:

- Both excess demand and differentiated demand. Students and parents may want a different kind of educational provision such as smaller classes and better, more highly qualified lecturers rather than what is provided by the government. Others seek alternatives to traditional education in terms of content or religion, because public institutions offer education that is standardised or uniform, not catering, for example, to minorities. Furthermore, economies and societies have become much more specialised; and more trades and occupations have developed that require specialised training.
- The inability of governments to fund and supply education to the extent needed because of resource limitations. Limited resources and capacity constraints result in overcrowding, crime on campus, and industrial action such as strikes over educators' salaries. This in turn exacerbates perceptions of the lower quality of public education, and drives the increase in private provision.
- General pressures such as globalisation and market liberalisation that have led to governments seeking more efficient, flexible, and expansive education systems. International organisations such as the World Bank usually link funding and support to education reforms, which lean towards privatisation.

From another perspective, privatisation can be seen on a continuum as shown in Table 3.3:

Table 3.3: Continuum of privatisation

	1	2	3	4
Dimensions	High "Publicness"			High "Privateness"
	←—————→			
1. Mission or Purpose	Serves a clear "public" mission as determined by the faculty or the state.	Mission is avowedly both public and private, but as defined by faculty.	Mission is mainly to respond to student's private interests, mainly vocational.	Mission serves private interests of students, clients, and owners.
3. Ownership	Publicly owned: can be altered or even closed by state.	Public corporation or constitutional entity.	Private non-profit: clear public accountability	Private for-profit
3. Source of Revenue	All taxpayer, or public, revenue.	Mainly public, but some tuition, or "cost sharing."	Mainly private, but public assistance to needy students.	All private revenue: mainly tuition-dependent.
4. Control by Government	High state control, as in agency or ministry.	Subject to controls, but less than other state agencies.	High degree of autonomy; control limited to oversight.	Controls limited to those over any other businesses.
5. Norms of Management	Academic norms; shared governance, anti-authoritarianism.	Academic norms, but acceptance of need for effective management.	Limited adherence to academic norms; high management control.	Operated like a business; uses management theory and models.

(Source: Johnstone, 2007: 2)

The private providers under investigation in this research probably fall between column 3 and column 4, with some differences, particularly with regard to the following:

- Mission and purpose: where tuition may not necessarily be vocational; and
- Ownership: where many of the private providers are “for profit” organisations.

Privatisation has been partly responsible for the increase in private provision, which is my main focus. Providers who are the subjects of this research are the businesses that offer training and education for a fee, (note: not necessarily for a profit). I discuss this in the next section.

We have seen that there is a growing international trend towards privatisation in education. Graves (2002: 42) states that education as a private good is “growing at an accelerated rate in one of its newer subsegments, namely that of skills-oriented, non-credit-bearing certification programmes”.

Many studies of privatisation focus on the provision of higher education at universities, but this does not present the full picture.

UNESCO (2005a: 396) regards as “private”, any educational institution that is controlled and managed by a non-governmental organisation such as a religious group, association, enterprise, or if its governing body consists mainly of members not selected by a public agency. Furthermore, it is becoming evident that “the private system of education in many countries is competing with the Government system” (UNESCO, 2005b: 16). Table 3.1 illustrated the growth of private provision of higher education (Altbach, *et al.*, 2009: xii). The authors (*ibid.*) observe that “private higher education institutions, many of them for-profit or quasi for-profit, represent the fastest-growing sector worldwide”.

The section on marketisation highlighted that the sector is run mostly on “a business model, with power and authority concentrated in boards and chief executives, faculty hold little authority or influence and students are seen as consumers” (Altbach, *et al.*, 2009: xii).

The discussion shows consistently that the state is not able to meet the demand for education. The National Planning Commission (2011: 271) states that there are “millions of young people who are eager to learn” but “FET colleges cater for only 300000” of these. In addition, the Commission (*ibid.*) states that FET colleges have a throughput rate of only 4%.

This means that there is a very high failure rate, and that students who enter a two-year programme either drop out before completing the qualification or take longer than the normal time to complete a qualification. This is therefore an inefficient system, both in terms of financial investment by the state, and in terms of delivering critically needed skills to the economy.

By default, then, the education of thousands of people has fallen into the hands of private providers, forcing some diminution of the power of the state. In a democratic society operating on a free-market system, this is an inevitable consequence of the law of supply and demand. Essentially, the inability of the state to supply the needs of the people creates the market for education. Entrepreneurs have taken the opportunity that the market offers.

3.10.2 Problems with Privatisation

A negative consequence of the law of supply and demand in education is the phenomenon of degree mills, which have arisen largely out of the increasing demand on employees to provide evidence of higher education credentials in order to secure employment (OECD, 2004: 6; CHEA, UNESCO, 2009: 1). According to a report of Accredibase, part of the UK-based background screening company, Verifile Limited, there was a 48% increase in the number of known degree or diploma mills operating worldwide in 2010 (Head, 2011: n.p.). Head states that such providers are able to provide a “highly malleable, accessible and potentially anonymous online platform” for delivery of programmes with little accountability to any regulatory authority, but also states that uncredentialled qualifications contain the seeds of their own destruction because this is “galvanising and helping to standardise official tertiary accreditation and registration processes worldwide”.

CHEA (*op. cit.*) states that degree mills:

- offer credentials that are based on limited study or engagement in higher education activity;
- are easy to start, difficult to eradicate, and seemingly immune to regulation;
- are a symptom of academic corruption that, regrettably, seems to go hand-in-hand with the growth of access to and participation in higher education.

Magome (2012: n.p) reports that in the 2011/2012 financial year, SAQA had evaluated almost 25 000 applications for verification of documents. Among these, it found 98 fraudulent qualifications purportedly from South African institutions and 83 from

unaccredited foreign institutions. It should be noted that it is unclear whether these documents emanate from public or private providers, or whether the fraud was committed by the applicant or the provider. Nevertheless, these examples serve to highlight the problem of degree mills.

A related concept is that of “grey training” (Accsys, 2009: n.p.) provided by individuals or companies that are not accredited by the regulatory bodies, a phenomenon prevalent in the South African market. Mackenzie (2006: 47) identifies the characteristics of such training as follows:

- The course will be based on whatever the provider decides the curriculum should be;
- The standard of the course is determined by the training provider;
- Providers do not include stakeholders in the design of their courses, so as to protect their intellectual property;
- Courses are generally knowledge-based and do not emphasise technical or practical skills;
- The course certificate has no value in terms of the NQF; and
- Lack of a quality management system means that a provider cannot guarantee the quality of the course and support services.

In South Africa, non-accreditation is not affecting higher education alone, but the provision of education and training at all levels (from ABET to skills training). Chapter 1 refers to the DHET’s attempts to crack down on such unaccredited providers. However, it is the researcher’s contention that overregulation is partly responsible for the continued existence of unaccredited providers (it has been noted that SMMEs make up most of this sector and are survivalist organisations, without either the finance or the human resources needed to service accreditation issues). As long ago as 1996, the problem of overregulation was acknowledged by the then Department of Education, which stated thus in the 1997 White Paper regarding the transformation of higher education: “overregulation allows a plethora of poor quality, unsustainable ‘fly by night’ operators into the higher education market” (Department of Education, 1997: n.p.). Altbach (2005: 8) also highlights overregulation as a major challenge if the state wants participation from private providers in the regulatory system. It has already been noted that the private provider plays a valuable role in the provision of education, and it therefore seems counterproductive to place obstacles in the way of their becoming accredited.

SAQA itself admits that such organisations need help and support to become accredited. The National Planning Commission (2011: 27) concurs that a “more enabling regulatory environment” needs to be established. DHET (2012: 33) recognises that “some providers have found the quality assurance systems difficult to comply with because of expectations from quality assurance bodies that courses should lead to unit standards or qualifications registered on the NQF”. Much of Chapter 2 was devoted to a discussion of these problems.

Private provision of education is not always of the required quality. Nevertheless, as stated in Chapter 1, this thesis does not focus on unaccredited providers who would be the most likely cause of the problems briefly outlined in this section. Instead, the focus is on the “honest broker” who wants to comply with the regulatory requirements.

3.10.3 The Advantages of Private Education over Public Education

An insightful study of more than 150 statistical comparisons covering eight key educational outcomes across 20 nations, found that private sector schools outperform the public sector in most cases (Coulson, 2009: 31). Coulson (*ibid.*: 35) cites freedom of choice and direct payment of fees by parents, autonomy for educators, minimal regulation, robust competition among schools, orderliness and discipline of the students, higher achievement rates and post-school employment rates, and the profit motive for the perceived effectiveness of these institutions as some of the reasons for this distinction.

Coulson came to the conclusion that there is “little evidence that government regulation improves the operation of the marketplace” (Coulson, 2009: 36), and that it is actually the freest, most market-like education systems that demonstrate the greatest margin of superiority over public schooling. Across time, countries, and outcome measures, private provision of education outperforms public provision according to the overwhelming majority of econometric studies (*ibid.*: 48). Aoki, *et al.* (2002: 244) found that, although private providers often demonstrate higher efficiency per unit of public subsidy, whether or not they produce higher learning outcomes per unit of expenditure, after controlling for differences in student background factors, is still a matter for active research and debate.

In support of Coulson’s findings, Fehnel, (2006: 240) cites Kelly (2001) who found that “experiences in other countries with large, corporate providers of higher education demonstrate that economies of scale and co-operation are manifest when profit centres can share costs and students”.

A recent survey of the 1600 private, non-profit, post-school colleges in the United States (NAICU, 2011) revealed the following:

- The classes are smaller than at many public colleges and universities, and students interact more readily with teaching staff outside of the classroom.
- Students at private colleges and universities are far more likely to complete their degrees (in other words, throughput rates are better than those in public institutions) and they have a higher level of satisfaction with their college experience (NAICU, 2011: 10).
- Private colleges and universities are responsive to the needs of all kinds of students, offering flexible study arrangements such as classes after hours or on weekends, or combinations of online courses together with *viva voce* lectures, and greater levels of student support such as employment services and career counselling (NAICU, 2011: 18). Flexible programmes and convenient locations can meet the needs of older working students, as well as part-time mid-career students who want or need new or enhanced skills.
- Students at private colleges and universities develop knowledge and skills that are fundamental building blocks for future success in the workplace (NAICU, 2011: 25), highlighted as follows:
 - ability to think critically;
 - problem-solving skills;
 - interpersonal skills;
 - preparation for graduate or post-graduate education;
 - preparation for employment after college;
 - writing skills;
 - understanding of social problems facing the nation;
 - leadership abilities; and
 - public speaking ability.
- By contrast, although it is acknowledged that these skills and attributes may also be developed at public institutions, Sullivan (2010: 2) in citing data on first-year students and seniors from the National Survey of Student Engagement (NSSE), a US-based survey, points out that public institutions:

- provide a less challenging academic environment and have lower academic expectations from their students;
- have their students engage in less active and collaborative learning;
- provide less student-faculty interaction;
- have less enriching educational experiences; and
- have less supportive campus environments.

These so-called “NSSE Benchmarks” correlate strongly with all-important kinds of student learning, such as effective reasoning and problem solving.

A key benchmark in education, whether public or private, is the throughput rate, or the rate at which students qualify within the prescribed time for the completion of a qualification. A related benchmark is the attrition rate, or the rate at which students drop out of a course before completing it. In the 1997 White Paper, the Department stated as one of its goals:

Ensuring equity of access must be complemented by a concern for equity of outcomes. Increased access must not lead to a 'revolving door' syndrome for students, with high failure and dropout rates. In this respect, the Ministry is committed to ensuring that public funds earmarked for achieving redress and equity must be linked to measurable progress toward improving quality and reducing the high dropout and repetition rates (Department of Education, 1997, paragraph 3.29).

Some 16 years later, public education is yet to achieve this goal. High attrition rates were cited in the National Development Plan Vision for 2030 (National Planning Commission, 2011: 273) as a cause for concern. Giannakopoulos and Buckley (2009: n.p.) say that after the massification brought about by the open access and equity policies, attrition rates reached about 70% in South African public higher education institutions.

By contrast, throughput of ‘private’ students in South Africa between 2001 and 2010 was 42% (across all NQF levels) (Blom, 2011: 32). This is compared with a throughput rate of 4% in public FET colleges (National Planning Commission, 2011: 270), and 22% at public universities (Letseka & Maile, 2008: 5). Note that this does not take into account the 50% drop out rate in the first two years of study at public institutions (*ibid.*). If one bases the throughput rate on reported enrolments, it drops to 11%. The cost to the economy is enormous, as the National Treasury invests billions of Rands in grants and subsidies to higher

education institutions without a commensurate return on investment (Letseka & Maile, 2008: 5).

The high dropout rate and the low throughput rate reflect both quality and quantity inadequacies in the education system (Letseka, 2009: 91). The dropout rate has been attributed to student problems such as finances, academic failure, lack of career guidance, misalignment of student choices and ability, under-preparedness, lack of social and academic integration, and lifestyle choices (*ibid.*: 94-97). OECD (2006: 9), however, states that “dropping out” is not necessarily an indication of failure by individual students, but high dropout rates may be an indication that the education system is not meeting the needs of its clients. It could be that the educational programmes offered do not meet students’ needs or expectations, such as the ability to find work once they have completed the course. They may also find that the time taken to complete their selected programmes keeps them out of the labour market for too long, especially if they need to start earning an income as soon as possible after leaving school. The combination of student factors and system factors, as outlined above, indicates both ineffectiveness and inefficiency in the public sector, whereas these trends are less evident in the private sector.

By contrast, since private providers report throughput rates to SAQA, the results uploaded to the NQF have all been verified, and any unaccredited providers cannot upload them, these organisations must be doing something right. It could be attributed to a better quality of provision. Blom (2011: 32) comments that it is “evident that private post-school education is expanding and increasingly contributing to qualified individuals in this sector”, another clear indicator of the important role that private providers have to play, and why they should be accommodated in the general system of education.

3.11 CONCLUSION

This chapter examines the macro-environment of quality assurance management and the trends in private education and training. Throughout the discussion, it is evident that the involvement of the private sector in education is both inevitable and important because the state does not have capacity to meet the growing demand for education at all levels (primary, further education and higher education). This is the case in South Africa and internationally.

Globalisation, internationalisation and regionalisation have brought pressure to bear on the education system. In addition, political changes have led to policies on transformation and

equity that have contributed to the massification of education, which brings with it problems of demand that cannot be met solely by state provision. Consequently, a burgeoning private provider sector has emerged that is reported to be more successful in terms of economy, efficiency and effectiveness than its public provider counterpart, and at least as successful in terms of equity.

All these issues together make a case for the existence of private providers. Why, then, are there problems with quality assurance as far as the regulatory authorities are concerned? Why are there problems with quality assurance as far as the private providers are concerned? Hopefully, this research will answer those questions.

The next chapter describes the approach taken in carrying out the research.

CHAPTER 4

RESEARCH DESIGN

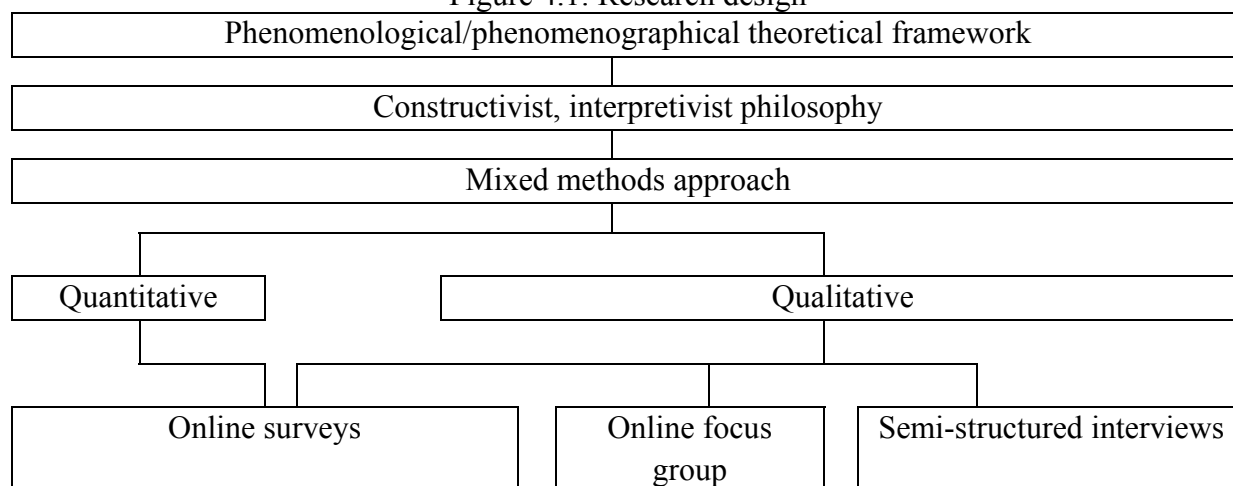
4.1 INTRODUCTION

Chapter 2 presented the case that private providers generally display compliance with the quality assurance requirements but that the main challenge they face is the complexity of the regulatory requirements fuelled to a great extent by the global trends taking place in quality assurance in education as discussed in Chapter 3.

The review of literature in Chapters 2 and 3 has also exposed certain concerns about the private providers, not all of which appear to meet quality requirements, particularly with regard to the qualifications of facilitators and academic staff. Both Umalusi and the DHET have indicated that they do not know enough about the private provider in South Africa, and this has led to perceptions and assumptions that do not perhaps reflect reality. Regulatory authorities' poor record-keeping and information management is a key factor in this lack of understanding of the private provider sector.

The research is exploratory in nature in that it seeks to provide insights into and an understanding of the problem (Polonsky & Waller, 2011: 94), namely that quality assurance presents some challenges to private providers. Figure 4.1 below presents an overview of the research design used in this thesis.

Figure 4.1: Research design



As this research is underpinned by both a phenomenological and a phenomenographical theoretical framework, I therefore examined experience of individuals in four groups of subjects, namely private providers, accreditation managers of education and training

authorities, chief executive officers of professional bodies, and education and training development practitioners, from their own perspectives and perceptions. I gathered information using mixed qualitative and quantitative survey questionnaires, an online focus group, and semi-structured interviews to arrive at a picture of their shared collective experience.

4.2 THEORETICAL FRAMEWORKS

Melguizo (2011: 402) claims that a theoretical foundation is essential where “lack of external accountability and outside evaluation is detrimental for a system that needs to be held accountable for the educational experience of the students”. It is pertinent to identify the theoretical framework that underpins this research, since it deals directly with external accountability and validation of private providers.

Various writers (Khan, n.d.: 4; Herek 1995: 86) discuss the benefits of using a theoretical framework as follows:

- The researcher is clearly able to identify the variables of the study within a general framework that aids data analysis;
- It is essential in conducting a qualitative study that uses descriptive or experimental methods – this thesis uses descriptive methods which are designed to “answer questions about the current state of affairs” (Stangor, 2011: 14). In this thesis the survey method has been used as the basis for the description;
- Identifying an explicit statement of the theoretical assumptions makes it possible for them to be critically evaluated;
- Defining the theoretical assumptions of a research study forces the researcher to ask critical questions such as “why” and “how”, allowing the researcher to move from merely describing an observed phenomenon to generalising about various aspects of that phenomenon. A key issue that needs consideration in a qualitative study like this one is that it is sometimes criticised for not being able to make valid generalisations, which Yin (2003: 99) calls an “unfortunate misconception”; and
- Having a theory helps to define the limits to those generalisations, and underpins a conceptual framework that specifies which key variables influence a phenomenon of interest. In-depth discussion of these key variables appeared in Chapters 2 and 3.

4.3 A CONSIDERATION OF THEORETICAL FRAMEWORKS

Camp (2001: 9) argues that education has suffered from the absence of theoretical orientations, accumulating vast numbers of facts through educational studies, but without accompanying integration into theories to help explain educational phenomena. Jabareen (2009: 53) states that the major concepts of a phenomenon make up its theoretical framework.

This research combines the phenomenological and phenomenographical theoretical frameworks (Ornek, 2008: n.p.) to create the focal lens through which the core question of this thesis is examined. Phenomenography is an interpretive research approach (Walsham, 2006: 320) that seeks variation rather than the “singular essence” in the phenomena being studied (Marton & Booth, 1997: 136; Bruce, Buckingham, Hynd, McMahon, Roggenkamp, & Stoodley, 2004: 145). The purpose of phenomenology, on the other hand, is to “capture the richness of experience, the fullness of all the ways in which a person experiences and describes the phenomenon of interest” (Marton & Booth, 1997: 117). It thus became my task to determine which phenomena would be the focus of the current study. These phenomena form the basis of the conceptual framework discussed in Chapters 2 and 3, and provide a platform for coding the data collected in the research.

4.4 RESEARCH PHILOSOPHY

According to Bradbury and Reason (2008: 129), all research is socially and politically situated. Thus, it is important to reveal the researcher’s biases, motives, and beliefs. I have generally adopted a constructivist, interpretive paradigm, with elements of positivism (Cohen, Manon, Morrison, & Morrison, 2007: 21), understanding that all observation is coloured by personal perceptions and therefore fallible, all methods have inherent error, and all theory can be revised and even refuted (Trochim, 2006: n.p.). Interpretation of the data with certainty is challenging because we necessarily hear a wide range of voices in research of this nature. In order to overcome this lack of certainty, the research design outlined below emphasises a mixed methods approach, which assists with the triangulation of results, and, in turn, contributes to the reliability and validity, or in qualitative terminology, the credibility and trustworthiness of the results (Houser, 2011: 224).

Creswell defines the constructivist approach as “social constructivism” (Creswell, 2003: 8) which relies as much as possible on the participants' views and subjective experience of the

situation being studied. It is a pragmatic approach in that it explores a particular phenomenon of the world and “looks at human conduct and practice that seeks to account for lived experience” (van Manen, 1990: 25). These terms support my adoption of a constructivist, interpretive stance. This research, investigates the “lived experience” of private providers, Chief Executive Officers (CEOs) of professional bodies, ETQA managers and ETD practitioners. The characteristic idea of philosophical pragmatism is that “ideas and practices should be judged in terms of their usefulness, workability, and practicality and that these are the criteria of their truth, rightness and value” (Reason, n.d.: 1; Creswell, 2003: 11). This also lends itself to an interpretive paradigm. The literature review revealed that there are some question marks over the “usefulness, workability, and practicality” of current quality assurance frameworks being used both internationally and locally in education.

This constructivist and pragmatic philosophy makes it clear that it will influence the way in which we carry out the inquiry or research. Guba and Lincoln (1994: 108) and Creswell (2003: 5) categorise alternative enquiry paradigms according to the researcher’s stance on the following four questions.

4.4.1 The Ontological Question

What can we know about the form and nature of reality? The fundamental ontological question is “why does anything exist”? In this thesis, the more specific ontological question I seek to answer is “what is the nature of private education in South Africa?” Questions arising from this are: “does education exist independently of the observer or is such knowledge socially constructed”? Ultimately, these basic questions lead to more general enquiry: “what guarantees quality in education?” and “why are there problems in this regard?” Up to this point in the research, the literature review has explored known data on post-school private education in an attempt to answer the last two questions.

4.4.2 The Epistemological Question

“What is the nature of the relationship between the knower or would-be knower and what can be known?” (Guba & Lincoln, 1994: 108). According to Hamlyn (1995: 242), epistemology deals with the nature of knowledge, its possibility, scope and general basis. It also seeks to understand how we know what we know, and what distinguishes true knowledge from false knowledge. As indicated in Chapter 1, I am involved in the accreditation of private providers for the organisation for which I work. The fact that I undertake this research arises out of my

need to know why and how the phenomena of quality assurance and accreditation have come to be such an important aspect of the educational landscape and what the effect of these phenomena is on the organisations and people involved. In essence, I have selected a micro-element of everything that can be known about education and seek to explore, understand and explain that micro-element in the hope that this will contribute to the entire body of knowledge in this field and indeed, to knowledge generally. In other words, understanding that I cannot possibly know everything, I have elected to set boundaries on the knowledge that I explore.

4.4.3 The Methodological Question

How can the inquirer go about finding out whatever he or she believes can be known (Guba & Lincoln, 1994: 21)? This relates to the strategy or plan of action that will help me to achieve the objectives of the research. The detailed research design (below) answers this question.

4.4.4 The Research Methods Question

What methods, techniques and procedures does the researcher propose to use (e.g. questionnaire, interview, focus group)? Research design detail answers this question as well.

4.5 RESEARCH DESIGN

Deciding on design parameters is a critical component of any research project. This is literally the point where “the rubber hits the road”, so to speak, and issues of validity and reliability (trustworthiness), generalisability (credibility), bias, integrity, and a careful understanding of what research methods would best support the research problem come under the spotlight. Cooper and Schindler (2004: 140) state that the research design is “the blueprint for the collection, measurement and analysis of data” while Zikmund, Babin, Carr and Griffin (2010: 66) define it as “a master plan that specifies the methods and procedures for collecting and analysing the needed information”. The blueprint’s aim is to establish a detailed plan of action, which focuses research on the problem statement.

4.5.1 Research Methodology

Research methodology is defined as the general approach a researcher takes in carrying out a research project (Leedy & Ormrod, 2005: 12).

There are two main research methodologies or approaches, namely qualitative and quantitative. However, Creswell (2003: 4) says that to include only the quantitative or qualitative method “falls short of the major approaches being used today in the social and human sciences”, with research practices lying somewhere on a continuum between the two, thus leading to a mixed methods approach. The challenge would be to decide what the most appropriate approach should be. The decision is not so much about whether one method is better to resolve the problem than the other, but rather which method will deliver appropriate findings to the problem at hand.

4.5.1.1 Mixed methods approach

The methods may be “a mix of qualitative and quantitative methods, a mix of quantitative methods or a mix of qualitative methods” (Brannen, 2005: 4). Mixed methods research also means working with different kinds of data (*ibid.*). Spratt, Walker and Robinson (2004: 7) see the emergence of mixed methods as a ‘third paradigm’, which is distinct from the positivist perspective of quantitative research and the constructivist perspective of qualitative research. Mixed method designs provide the basis for triangulation and “become the source of different ways of conceptualising the problem” (Spratt, *et al.*, 2004: 8).

Trochim (2006: n.p.) adopts an enhanced approach in the qualitative/quantitative debate when he states that “both qualitative and quantitative research can be used to address almost any kind of research question” and that qualitative data can be interpreted using quantitative methods and vice versa. This supports a mixed methods approach, which is becoming more and more acceptable among academic researchers (Buchanan & Bryman, 2007: 486). The authors call this a “paradigm soup” (*ibid.*: 487). They warn, however, that “no central core of traditions, frameworks, and concepts, and no unified theoretical or practical proposal” may result, leading to a kind of wooliness and problems with trustworthiness and credibility of the results. With these reservations in mind, I adopted a mixed methods research approach, integrating both qualitative and quantitative techniques for data collection and analysis.

4.5.1.2 Research questions in a mixed methods approach

Teddlie and Tashakkori (2009: 129) define mixed methods research questions as questions “concerned with the unknown aspects of a phenomenon” that “are answered with information that is presented in both narrative and numerical forms”. They recommend developing one overarching mixed methods question extended into qualitative and quantitative sub-questions.

In addition, Teddlie and Tashakkori (2009: 113) have developed a typology comprising the following three general categories for identifying various reasons for conducting mixed methods research:

- personal reasons for conducting the study (for example, as the accreditation manager of a professional body responsible for accrediting private providers, I have a personal and professional interest in conducting this study);
- reasons associated with advancing knowledge (because I believe that not enough is known about the private provider's experience of quality assurance and this has been confirmed by Umalusi and the DHET as indicated in Chapter 1); and
- societal reasons associated with improving or empowering society, institutions, and oppressed groups. This current research would serve to empower institutions such as quality assurance bodies as well as private providers, the latter, in a tenuous sense, being an "oppressed group" (Teddlie & Tashakkori, 2009: 93).

Adhering to this three-component process helped me to develop the research objectives followed by the development of the research question(s).

4.5.1.3 Research design in a mixed methods approach

The research design of this thesis is in accordance with a "QUAL < quan" approach (Morse, 2003: 197) which means that both qualitative and quantitative methods were used, with the qualitative paradigm being predominant. This provided opportunities for triangulation, leading to enhanced validity, reliability, credibility and trustworthiness of the results.

Triangulation "is a term borrowed from navigation and surveying, where a minimum of three reference points are taken to check an object's location" (Easterby-Smith, Thorpe & Lowe, 2002: 146). McNeill and Chapman (2005: 66) call this a "pragmatic norm" in modern research. In terms of research, triangulation means that different forms of information could be gathered using different measures, time frames and sources. It also enables comparison of information gathered at different locations by different researchers to see if there were any similarities or differences. This normally implies combining different methods and is crucial in looking at complex questions and issues. It is a preferred means of clarifying the relationship of focus group data to that collected from a wider population in a survey. It also facilitates the use of official statistics or other documents such as policies. The mixed methods paradigm was therefore appropriate to the current study.

Easterby-Smith, *et al.* (2002: 146) identified different forms of triangulation, namely:

- Triangulation of theories, involving models and theories from different disciplines to explain situations in another discipline. An example would be looking at models or theories from business to try to explain models or theories in education, such as the stakeholder model discussed in Chapter 2 or the human capital model discussed in Chapter 3.
- Data triangulation, which means data that are collected at different time frames or from different sources (Easterby-Smith, *et al.*, 2002: 146) or when data, a finding, or a generalisation are verified by several different research methods (Driscoll & Brizee, 2010: n.p.). The time frame concept has already become evident in this thesis in highlighting the data that have been collected in several studies over a period of about 10 years, as discussed in Chapter 2; and different sources were used in carrying out the practical aspects of this research (see the discussion on sampling below).
- Triangulation by investigators occurs when data results from a single situation but derived from various sources are compared (Easterby-Smith, *et al.*, 2002: 146). It is only partially used in the current research, and in a purely historical sense (for example the studies conducted by the CHE, Umalusi, CHEA and Blom which have already been referred to in the literature review). I have not worked collaboratively with other researchers.
- Finally, Easterby-Smith, *et al.*, (2002: 146) state that “methodological triangulation uses a combination of different methods, both qualitative and quantitative”. For the methodological triangulation to be effective, it needs to incorporate methods from the quantitative and qualitative approaches. This type of triangulation will take into account characteristics from both research approaches. The discussion below indicates that methodological triangulation is a key feature of the current research.

4.6 SAMPLING

Sampling appears to be associated more with a positivist, quantitative research paradigm rather than a post-positivist qualitative paradigm; however, the mixed methods approach of this thesis makes sampling an appropriate technique to use. Coldwell and Herbst (2004: 74) define sampling as “the act, process or techniques of selecting a representative part of a population for the purpose of determining parameters or characteristics of the whole population”. In deciding on an appropriate sample to address this problem, I used a “multilevel sampling design” (Onwuegbuzie & Leech, 2007: 240) that assisted me to arrive at

“credible comparisons of two or more subgroups that are extracted from different levels of study” (*ibid.*: 248). The focus was on ensuring that the target population was representative (a quantitative term), identifying the sampling frame and deciding on the sample size.

4.6.1 The Target Population

In the current research, there were four populations, namely:

- accreditation managers or principals of accredited private providers depending on who is responsible for accreditation at each institution;
- CEOs of professional bodies;
- ETQA managers of the SETAs, the CHE, Umalusi and the QCTO; and
- members of the Skills Universe Forum subgroup called the “accreditation, training material, assessment” discussion group.

4.6.2 The Sampling Frame

A sampling frame (Zikmund, *et al.*, 2010: 391) refers to a list or any other record of the population from which all the sampling units are drawn. As indicated in Chapter 1, the sampling frames are shown in Table 4.1 below.

Table 4.1: Selected sampling frames

Respondent group	Target Population	Sample	%	Source
Principals or accreditation managers of tuition providers	8 900	Opportunity sample (explained below)	62	The websites of the SETAs – see Appendix A
Quality assurance officials (at each ETQA)	23	23	100	NQF website (NQF, n.d.)
CEOs of professional bodies	39	39	100	SAQA website (SAQA, n.d.: n.p)
Members of the Skills Universe forum	318	Volunteer sample (explained below)		www.skillsuniverse.com

4.6.3 Ensuring Representativeness

According to Bartlett, Kotrlik, and Higgins (2001: 46), the researcher conducting a survey needs to make sure that the sample is sufficiently large and representative of the population because confidence in the results rests largely on these two factors. The size of the sample links to notions of certainty, validity and reliability (in quantitative terms) or trustworthiness and credibility (in qualitative terms). However, representative sampling is sometimes not

possible to achieve in qualitative research because of the exploratory nature of the research, the potential problems of negotiating access, and the amount of work involved for one person.

In some cases, one has to make do with an opportunity sample (Woods, 2006: n.p.) in those areas where access is offered. In such cases, the way in which we do the sampling must be clearly explained and care taken to avoid inappropriate generalisations of the findings.

The following are key issues in this thesis:

- Because of the accessibility of the populations, I decided on census sampling. According to Lund Research Ltd. (2010: n.p.) “total population sampling is a type of purposive sampling technique where you choose to examine the entire population(i.e. the total population) that has a particular set of characteristics”. This facilitated deep insights into the phenomenon I was interested in, and mitigated against the risk of missing potential insights from members that were not included. Total population sampling is a purposive, non-probability sampling technique, meaning that it is “not possible to make statistical generalisations about the sample being studied” (Lund Research Ltd., 2012: n.p.), although analytical generalisations about the population being studied are possible (Yin, 2003: 31). This chapter contains detailed discussion of generalisation.

Nevertheless, the following limitations are noted:

- About 38% of tuition providers in the sampling frame did not have listed email addresses, thus excluding them from the sample. According to Strydom (2011: 92), this amounts to “judgement sampling”. The cost of employing research assistants to contact the approximately 3000 tuition providers without email addresses in order to administer the questionnaire manually was prohibitive.
- Only 20 of the regulatory authorities had easily accessible databases. This impacts on generalising of the results. For example, because access to the databases of providers of the CETA, TETA and CTFLSETA was so limited, it is not possible to say that the experiences of the tuition providers accredited by the other SETAs can be generalised to include these three SETAs.
- The population of CEOs of professional bodies is only 39, but according to Johnson and Christensen (2012: 234) the ideal sample size would be 36. The total population was surveyed.

- The population of ETQA accreditation managers – 23 – is small enough to permit surveying the total population. According to Johnson and Christensen (2012: 234), the ideal sample size would be between 19 and 24 (on populations of 20 – 25).

It should be noted that the principle of sampling without replacement was applied (Thompson, 2012: 270), meaning that each member of the sample could be selected only once. Creating an alphabetical list of email addresses from the whole database and deleting any duplicated addresses ensured compliance with this principle. In mining the email addresses, it became evident that there was duplication of addresses where more than one SETA accredits a tuition provider. Blom (2011: 7) highlighted this in Chapter 2 by describing regulatory bodies' data management as weak and fragmented. It is also clear from this that providers are not adhering to the principle of only one ETQA per provider (SAQA, 2000: 9). The online survey also applied sampling without replacement so that each participant could complete the survey only once. This was a restriction built into all the surveys and helped to prevent skewing of the results.

4.6.3.1 Opportunity sampling

For the surveys, opportunity sampling was occasioned in this research because not all SETA websites had the contact details of their providers readily available, and were unresponsive to requests for such information, for example the Clothing, Textile, Footwear and Leather SETA (CTFLSETA). The search for this information revealed that the majority of providers in two sectors, namely the Construction SETA and the Transport SETA, do not even have websites. The sampling frame therefore consisted of the databases of 18 SETAs, SAQA's list of registered professional bodies, Umalusi's list of private FET providers, and the CHE's list of accredited PHEIs.

4.6.3.2 Volunteer sampling – focus group

Volunteer sampling is a type of purposive sampling technique that is a “type of non-probability sampling that is most effective when one needs to study a certain cultural domain with knowledgeable experts within” (Tongco, 2007: 147). The population of the Skills Universe forum on accreditation, training material, and assessment comprises 318 ETD practitioners. This population of knowledgeable experts provided the volunteer sample.

I am a member of this group, so it was through personal contact that I created the online focus group. Participants were expected to change from time to time as people joined and

left the discussion at will, making it impossible to determine a sample size for this population. Initially 23 people responded to say that they were willing to participate in the focus group. The table above indicates that the sample size of this group was indeterminate as the discussion took place in an asynchronous fashion (Rezabek, 2000: n.p.). In other words, the participants were not sitting in a room for an hour at the same time, but logged in to the focus group forum after being sent an email from the Skills Forum website, and answered the questions online as and when they had the time. Each question was posted for a short while, before the next question was posted. This gave the focus group sufficient time to respond.

The samples described above comprised those people most involved with and affected by quality assurance in private education. Selecting four different populations provided for triangulation of the results. In this instance, the four samples were distinct groups of people with the common interest of quality assurance in education. The first two samples were distinguished because they did not all receive the same questionnaire, although there were some similarities. Both interviews used the same questions. The fourth group did not receive a questionnaire but participated in an online focus group discussion based on a number of pertinent, open-ended questions posed over a period of about three weeks.

4.7 DATA COLLECTION

Research on quality assurance can amount to a very detailed exercise as one seeks to gain a better understanding of the nature of the problem. Data interpretation, reflection and analysis of substantial sources of data occurred throughout this research process. There are various methods of collecting data. My focus was on using a mixed methods approach relative to the research objectives.

The data collection tools were:

- three online surveys, by means of self-administered questionnaires including both quantitative and qualitative questions, of
 - a convenience sample of the principals or accreditation managers of accredited tuition providers in South Africa;
 - the total population of professional bodies in South Africa; and
 - the total population of ETQA managers in South Africa;

- a question schedule for the online focus group, whose responses to various questions posed on the forum were utilised for purposes of qualitative analysis; and
- question schedules for the semi-structured interviews with an ETQA manager and a CEO of a professional body (one of each). Transcripts of recorded interviews were utilised for purposes of qualitative analysis.

Due to the importance of collecting and analysing reliable data, I needed to focus the surveys and question schedules primarily on the specific research question (Siniscalco & Auriat, 2005: 5), namely, the challenges experienced by private providers in the post-school sector with respect to quality assurance. This meant sourcing primary data. Primary data offer a better source of reliability due to their precision, thereby contributing to the validity of the results. Primary data are typically described as those data that are closest to the truth, like the data collected through self-evaluation questionnaires, despite the weaknesses of social desirability and non-response bias (Thompson, 2012: 5). On the other hand, the researcher usually interprets secondary data subjectively, leading to a distortion of the truth. Chapters 2 and 3 used secondary data to inform the study.

4.7.1 Surveys

4.7.1.1 Qualitative surveys

As indicated above, the usual data collection instruments used in phenomenological and phenomenographic research are interviews, focus groups and observation; however, using surveys in qualitative research is not unknown and they have been used in other qualitative studies (Priebe, Ross & Low, 2008: n.p.; Hanks, 2010: 152; Penn-Edwards, 2011: 19). Since there seems to be some debate about using “surveys” in qualitative research, this point needs to be clarified. In debating this issue, several authors (Marsland, Wilson, Abeyasekera & Kleih, 2001: 1; Hildebrand, Simmer, and Fielden, 2003: n.p.; Jansen, 2010: n.p.; Stopher, 2012: 199) state that qualitative surveys involving a small number of participants have become quite common. In addition, Jansen (2010: n.p.) states that surveys generally apply only to “quantitative studies that primarily aim at describing numerical distributions of variables (e.g. prevalence rates) in the population. In the case of sample surveys, statistical representativeness of the sample, data quality and precision of estimates (confidence limits), are the main issues”. However, he explains that “the qualitative type of survey does not aim at establishing frequencies, means or other parameters but at determining the diversity of some topic of interest within a given population”.

This type of survey establishes the meaningful variation (relevant dimensions and values) within that population rather than simply counting numbers. In short, the qualitative survey is the study of diversity (not distribution) in a population (Fink, 2003: 68). I consequently use the word “survey” in terms of the qualitative paradigm that I largely adopted. The only difference between Johnson’s approach and mine was in the size of the sample of population members.

4.7.1.2 The qualitative aspects of the surveys

I catered for the qualitative aspects of the surveys by using open-ended questions. Johnson and Turner (2003: 298) call this “intramethod mixing” (employing a single method that includes quantitative and qualitative components, for example, open and closed items on a single questionnaire). The social constructivist approach discussed above lends itself to open-ended questioning, which is more typical of qualitative than quantitative research (Cresswell, 2003: 8).

4.7.1.3 The quantitative aspects of the surveys

The surveys indicated above were comprised of intra-method mixing and elicited both qualitative and quantitative data. The quantitative aspects of the survey were focused on determining the following:

- the range in sizes of private tuition providers from survivalist to large corporate enterprises;
- the kinds of programmes offered (skills programmes, short courses, whole qualifications, learnerships);
- the number of programmes offered;
- the duration of the programmes provided;
- the extent to which tuition providers are accredited by more than one ETQA;
- the specific problems that tuition providers have experienced with their ETQA;
- the opinions of the participants regarding accreditation and the value thereof, using a yes/no answer to a series of relevant statements;
- the opinions of the participants regarding quality assurance and the value thereof, using a yes/no answer to a series of relevant statements; and
- the relative importance of the stakeholders for each group of participants.

The data was statistically analysed using graphs and averages.

It is thus important that any selected method should focus exclusively on the research problem. For example, an essential element of questionnaire design is the relevance and necessity of the questions asked about the research problem and to the research population. It is vital that it speaks to the research problem in detail, phrased in such a way that does not lend itself to bias, for example by avoiding leading questions, and asks questions in a manner that is “intelligible to the respondents” (Gill & Johnson, 2002: 115). Using a survey questionnaire that is interesting to the respondent, not burdensome to complete, and addresses the respondents’ concerns and interests is also a key to a high response rate (Colasanto, n.d.: 22).

4.7.1.4 Online surveys

I utilised the SurveyGizmo.com website for the compilation and delivery of the online surveys. My reasons for choosing to use questionnaires delivered via an online survey were as follows:

- The data gathered is standardised and, therefore, relatively easy to analyse, although this may be a limitation when one is dealing with diversity. Questionnaires by their very nature do tend to exclude some issues, while open-ended questions do not generally elicit high, rich responses (McArthur, 2012, email correspondence).
- Data gathered from a large number of respondents is quick. Participants were given 10 days to respond and a follow-up reminder email was sent 5 days before the cut-off date in order to enhance the response rate;
- Respondents were assured of anonymity and confidentiality, ensuring an ethical approach to the research; respondents could therefore answer honestly without fear of negative consequences should their opinion be controversial;
- Online surveys are relatively inexpensive as they rely on electronic means of distribution as opposed to postal costs like printing and stamps.
- An online survey provides quantitative data presented in the forms of table and graphs which are easily transferable into the findings.
- One person with the necessary skills can administer the whole process;
- The email addresses of the potential participants are in the public domain, and therefore easy to access.

I have noted that responses may be inaccurate, especially if the respondents misinterpret the questions in the self-completing questionnaires, or if someone other than the intended recipient completes the survey. In addition, ensuring representivity requires a substantial sample size (Baruch & Holtom, 2008: 1151). I anticipated that the response rate would produce a reasonable sample size for analysis, and assumed that the participants would answer honestly.

4.7.1.5 Response rates

A key issue with questionnaires is poor response rates if people lack motivation to complete or return them. Consequently, some sort of incentive such as a prize draw is sometimes offered (*ibid.*: 1145). However, I regard this as unethical with a potentially negatively influence on the validity and reliability of the results. The anticipation in the present instance was that by the very fact of being asked, participants would be sufficiently motivated. The questionnaire design aimed to minimise respondent fatigue – as a rule of thumb, it should take no longer than 15-20 minutes to complete a self-administered questionnaire (Eiselen & Uys, n.d.: 15).

Experts differ as to what constitutes an adequate response rate. According to the University of Texas at Austin (2010: n.p.), an acceptable return for an online survey is 30%, while Rubin and Babbie (2009: 117) state that a 50% response rate is usually considered adequate for analysis and reporting. Denscombe (2007: 23) says that there is no “hard and fast rule” about what constitutes an acceptable response rate, but that certain mechanisms can be used to enhance the response rate such as good, professional presentation, simple questions and keeping the questionnaire short so that people do not get tired answering it. The fact that this specific research focuses on a topic that is of major concern to the sample populations raised expectation of an adequate response rate.

Colasanto, (n.d.: 17) states that researchers focus on the level of the response rate because “non-response bias” can impact the survey results. Neither the relationship between response rate and non-response bias, nor how non-response bias may differ from survey to survey is yet well understood. The response rate is usually the only indicator of sample quality that is reported for a survey. Perhaps this is so because a response rate is easy to calculate (*ibid.*: 17). Nevertheless, according to Biersdorff (2009: n.p.) “response rate is not the best way to judge the accuracy of survey results, but representativeness of respondents is. The main advantage of a high rate of response is in reducing the possibility of a non-representative

sample". In order to increase the response rate, Deutskens, De Ruyter, Wetzels, and Oosterveld (2004: 23), advised sending a second email to the participants who do not respond on the first invitation in order to encourage them to do so.

4.7.1.6 Planned response rates

4.7.1.6.1 Private providers

Watson (2001: n.p.) states that the base sample size means the number of responses that must be returned when the survey is conducted. However, since not everyone will respond, the sample size needs to be increased, in order to counteract the effect of non-responses. He provides the following method (Table 4.2) of determining sample size in order to have a confidence level of 95% with a confidence interval of 5%:

Table 4.2: Determining required response rates

Size of population	Variability in population				
	50% = a sample size of	40% = a sample size of	30% = a sample size of	20% = a sample size of	10% = a sample size of
3 000	353	328	163	98	57
4 000	364	338	165	99	58
5 000	370	343	166	99	58

In my estimation, the target population of private providers have a 20% variability ratio, calculated on the following basis:

- SAQA's classification of providers on a 5-level spectrum of survivalist to large providers (SAQA, 2004: 7);
- The number of private providers of 8917 divided into HET and FET providers in the following ratios: 362 HET providers: 8555 FET providers = a ratio of 4: 96 (Blom, 2011: 17); and
- Single-purpose and multi-purpose organisations on a ratio of 8: 92 (Blom, 2011: 28).

Because only 62% of private providers (5 529) (SETA databases, 2011, Appendix A; SAQA, 2013, n.p.) are potentially accessible, it is calculated that 99 responses are therefore needed for the results to be statistically significant.

4.7.6.1.2 CEOs of professional bodies and ETQA managers

According to Watson (2001: n.p) the response rate that needs to be achieved on very small sample sizes cannot be statistically calculated. Clearly a higher response rate allows more generalised results, but taking into account, this could in any event only be generalised analytically, and not statistically as previously mentioned by Lund Research Ltd. (2012: n.p.) and Yin (2003: 31).

The questionnaires' anticipated rate of return would enhance the validity, reliability, credibility and trustworthiness of the findings.

4.8 THE DESIGN OF THE SURVEY QUESTIONNAIRE

Questionnaire design, production, distribution and analysis are complex, making this research tool expensive and time-consuming, but I took all those factors into account. A survey and an online focus group were appropriate in this instance, because access to the research populations was comparatively easy. The use of an online survey reduced the cost of production and the time for distribution and return and the use of computer software for analysis reduced the costs and time used in analysis.

The starting point of a questionnaire is the “transformation of general educational research and policy concerns into specific research questions for which the data are intended to supply an answer” (Siniscalco & Auriat, 2005: 5). The research questions (arising out of the objectives stated in Chapter 1) that this study addresses are:

- What mechanisms are in place in the South African education and training system to instil a quality assurance mindset or culture into all the various stakeholders? This has been answered in Chapter 2;
- Why has quality assurance become such a critical focus in education? This has largely been answered in Chapter 3;
- How do private providers perceive quality assurance in their respective organisations?
- What problems are there with existing quality assurance policies, practices and processes?
and
- Are there any feasible alternatives to the current models and paradigms of quality assurance in private education and training in South Africa?

In order to get answers to these questions, I used three standardised questionnaires aimed at different target groups. A questionnaire is said to be standardised when “each respondent is to be exposed to the same questions and the same system of coding responses” (Siniscalco & Auriat, 2005: 3). The questionnaires used here contained a mixture of quantitative and qualitative questions with the inclusion of some questions requiring a ranking of opinion (or Likert scale), more typical of a quantitative survey, as well as space for the respondent’s reasons or own opinions to allow for qualitative analysis.

4.8.1 The Construction of the Questions

The questions followed the terms of Siniscalco and Auriat’s (2005: 22) classification, namely closed, open-ended, and contingency questions. The advantages of this approach are that it preserves the possibility of easy computation whilst providing respondents with the opportunity to present their own ideas. This is important in phenomenographic studies where the researcher seeks conceptual responses by the participants (Penn-Edwards, 2011: 18).

Closed questions make it easier to compare the views of one group with another (Gray, 2004: 195), and help to avoid differences in interpretation (Coldwell & Herbst, 2004: 51). Closed questions may use a frequency scale, an importance scale, or an agreement scale (Siniscalco & Auriat, 2005: 23); the questionnaires used all these scales. A Likert scale was used to measure different views/opinions on the questions being posed. Closed questions were sometimes phrased as statements, for example, “Quality assurance is a critical business imperative”, and responses were noted.

Open questions have a potential to elicit responses unanticipated by the researcher (Gray, 2004: 194). Questions and statements included: “What suggestions do you have for improvements in the quality assurance system?” or “What are the key problems you have had to deal with in accrediting providers?”

The questionnaires by design asked closed questions with an opportunity for participants to comment on any aspect of the question, thereby adding an “open” element to the question. Where participants gave specific answers to a question, as in the Yes/No questions, they were also asked to clarify their answer in an open-ended follow-up question. The open elements allowed for qualitative analysis. The final question on all the questionnaires was a completely open question asking for the participants’ suggestions for possible alternatives to

existing quality assurance paradigms. This approach facilitated both quantitative and qualitative analysis.

Appendices E, F and G provide the questionnaires.

4.8.2. Dealing with Response Bias

Some of the closed questions asked about attitudes or opinions. The order of the answer choices provided in the questionnaire can influence the answers, however (Siniscalco & Auriat, 2005: 24). In constructing attitude scales, a vital consideration is changing the sequence of response categories and values to reduce response bias (*ibid.*). For example, if the choice of responses ranges from negative to positive or disagree to agree on a scale of 1 – 5, then the order on some questions can be reversed to range from positive to negative on a scale of 1 – 5 (*ibid.*).

Secondly, the questionnaire for tuition providers was pretested in a survey conducted during 2011 (Baumgardt, 2011: n.p.). Most of the questions did not present any difficulties, but I made some adaptations to the current questionnaire to allow for easier statistical analysis. The trial run asked participants to suggest improvements or make comments at the end of the questionnaire, and these were incorporated into the final questionnaire.

It would have been difficult to pilot the questionnaires for CEOs of professional bodies and ETQA accreditation managers because finding another group for this purpose in the small populations involved was impracticable. However, the Danish Evaluation Institute: Quality Procedures in European Higher Education NQA survey conducted in 2002 (as reported in European Network for Quality Assurance in Higher Education, 2003) provided guidance on the kinds of issues that should be addressed and the types of questions that should be used.

The mixed-methods survey questionnaire using both closed (quantitative) and open (qualitative) questions thus supports the research paradigm underpinning the current research. Chapter 5 includes comments on problems with the questions.

4.8.3 Semi-Structured Interviews

Part of the qualitative research envisaged in this thesis used semi-structured interviews. These individual in-depth interviews allowed for a deep probing of the interviewees' experience as key informants to accreditation and quality assurance of private providers (DiCicco-Bloom & Crabtree, 2006: 315).

They were selected as a data-gathering method in this thesis because of their flexibility. Although the essential questions were contained in an interview schedule, they were not set in a specific order as in a structured interview, and they lent themselves to deeper exploration of specific issues as the need arose (Merriam, 2009: 90). In order to explore an idea in greater depth, a question on the interview schedule may prompt further ad hoc questions as the interview proceeds (DiCicco-Bloom & Crabtree, 2006: 315). A semi-structured interview is not as loose as an unstructured interview, and tends to avoid discussion of unimportant and irrelevant issues.

Semi-structured interviews were conducted with one ETQA accreditation manager and one CEO of a professional body. An interview guide (Merriam, 2009: 114) provided a means of triangulation for the results. Each one-hour interview was audio-recorded for later transcription using the Livescribe Echo smartpen as an audio-recording device (it is unobtrusive and looks like a pen). This meant about four hours for transcription of each interview for purposes of analysis (IB Transcription Services, 2008: n.p.). The interviews took place in the offices of the interviewees, which contributed towards a more relaxed and natural environment (Boyce & Neale, 2006: 3).

Some cautionary issues concerning semi-structured interviews include the interviewees presenting a biased viewpoint, the time-intensive nature of interviews, lack of generalisability, and the skill of the interviewer (*ibid.*). The impact of these problems can be minimised by drafting an interview protocol (see Appendices B and C) and a good question schedule ahead of time, and scheduling the interviews for a defined duration. The generalisation problem is minimised by the results of the surveys. My experience in the field of accreditation of private providers meant I was able to guide the interviewees and keep them focused on the main issues.

4.8.4 Focus Group

Qualitative research also utilises focus groups. A focus group involves a group of people in conducting an interview, usually simultaneously and with a defined time constraint (DiCicco-Bloom & Crabtree, 2006: 315). I created an online focus group, and obtained answers in an asynchronous manner. According to De Wever, Schellens, Valcke, and Van Keer (2006: 2), this asynchronous arrangement is a common technique in educational research. Conducting the focus group online was advantageous as it allowed the discussion to take place over several days rather than having to be set up at a specific time and place. Participants had the

liberty to enter and leave the discussion at any time or to answer only some questions and not others.

The focus group consisted of members of the Skills Universe Forum, and more particularly the subgroup dealing with accreditation, assessment and materials development. In response to an online invitation, twenty-three people expressed their willingness to participate. The online invitation included the necessary informed consent request whereby members could indicate that they understood the focus group's purpose, and what it would require of them. The group was closed and participation was by invitation only. The information was not accessible to the general public, as this is sometimes problematic with online forums. This dealt with the ethical problem of "harvesting" information without the contributors being aware of it (Stewart & Williams, 2005: 400).

A question schedule (Appendix D) was developed for the focus group, with the questions concentrating on the same issues dealt with in the questionnaires and interview schedules. A schedule ensured that the information was both pertinent to the research questions, and focused on the key issues of quality assurance. A total of ten questions asked over a period of several days allowed sufficient time for participants to respond, as well as discuss the questions in depth with me and the other participants. It was essentially an asynchronous, online conversation. Because the participants themselves typed their responses, no transcription from a tape-recording was required, as is the case for a *viva voce* focus group. This saved time. The transcript of this focus group discussion was used for qualitative data analysis and triangulation.

Merriam (2009: 108) suggests that the interviewer should be "distanced" from the focus group in order to avoid subjectivity and influencing focus group members to think in a particular way. This was pertinent since I am a member of the focus group's progenitor group and I posed the initial questions from the question guide, and asked further probing or directive questions during the course of the online conversation. I avoided commenting myself, in order not to impose my thinking on the discussion.

4.9 VALIDITY AND RELIABILITY

It is important for the researcher to address validity from the outset to ensure that time is not wasted by discovering a posteriori that the findings are not valid. Every step of the process requires validity assessment. Leedy and Ormrod (2005: 97) state that this contributes to the

“accuracy, meaningfulness, and credibility of the research project as a whole.” The researcher should thus ensure that all aspects of the research are focussed on the research problem, and specifically and accurately describe what is actually happening. Accurately sourced data best reflect the reality of the situation.

Validity describes the degree to which the research findings are true. Walliman (2006: 34) lists these types of validity:

- Measurement validity – the degree to which measures (for example, questions on a questionnaire) successfully indicate concepts.
- Internal validity – the extent to which “causal statements are supported by the study”. Internal validity threats in qualitative research may be theoretical, interpretive, or descriptive in nature. In this study, internal validity was maximised by reducing sampling error and researcher bias (Salkind, 2010: 1172) through triangulation of results and reflexivity (Johnson & Christensen, 2010: 265). Researcher bias has already been identified in the opening sections of this chapter, and I was ever mindful both of my own biases as well as the need for internal validity.
- External validity – the extent to which findings can be generalised to a whole population, other populations or to other settings. In discussing confidence levels and confidence intervals above, it is clear that achieving these percentages in terms of response rates assures external validity.

The problem is that the term “validity” implies a purely positivist, quantitative paradigm. In qualitative research, this concept has been defined as quality, rigour and trustworthiness (Golafshani, 2003: 602), better aligned to an interpretivist approach. Validity links closely to reliability, and one cannot exist without the other (*ibid.*). Cooper and Schindler (2004: 710) define reliability as “a characteristic of measurement concerned with ... accuracy, precision, and consistency”. When data are accurate and precise, they lend themselves to the belief that the information is authentic. In respect of these findings, the key aspect centres on whether the research findings can be repeated and yield the same results when applied at a different time and place (Cooper & Schindler, 2004: 292; Walliman, 2006: 34). In qualitative terms, this is called “confirmability” (Morse, *et al.*, 2002: 14), and is an indicator of internal reliability.

The integrity of the researcher may also prejudice the validity of the findings if the researcher is “too close” to the problem. Coldwell and Herbst (2004: 78) note that the “personal prejudices of either the designer of the study or the data collector may tend to induce bias”. Bias introduces subjective elements into the research process, which invariably have a negative impact on the authenticity of the results. A mixed methodology reinforces triangulation, which in turn assists with minimising personal bias.

Not only must the researcher show integrity, but data that are gathered must also have integrity. According to Danforth (2008: n.p.), data integrity “gives the users the assurance that information they see is consistent, correct, and accessible and that it builds on the trustworthiness of the information to the user”. Thus, when accuracy, consistency, reliability and validity are all present, the data could be said to have integrity. For me as the researcher, this is an ethical issue. According to Kimmel (1988: 34), “an unethical judgement can undermine the rights of research participants through the methods used, or society at large through the implications of research findings”. In social research this relates more to “intellectual and moral soundness” (*ibid.*) rather than to normative scientific integrity. I, therefore, had the responsibility to ensure that the research’s findings and conclusions relied upon data of the highest possible integrity.

4.10 VERIFICATION STRATEGIES

The following verification strategies (based on Morse, *et al.*: 2002: 18) were used to ensure the validity of the data and the interpretation thereof.

4.10.1 Ensuring Methodological Coherence

Throughout the preceding discussion, a mixed method approach has been emphasised. The survey questionnaire design incorporates both quantitative and qualitative questions. An online focus group provided a basis for qualitative analysis to support the quantitative and qualitative findings arising out of the surveys. Semi-structured interviews also provided for qualitative analysis.

4.10.2 Sampling Sufficiency

The sampling approach was described in detail above. The opportunity sampling method should provide a sample that was big enough to negate any questions about representativeness. The volunteer sample comprising the focus group turned out to be 6%

(23/381) of the population. The participants were Education, Training and Development (ETD) practitioners directly involved in quality assurance and accreditation matters. Four different target populations provided for triangulation.

4.10.3 The Relationship between Sampling, Data Collection and Analysis

As discussed by Marshall and Rossman (1999: 26), the process of gathering and analysing data is iterative. Qualitative research, in particular, tends to be iterative (Becker, 2009: 547) in that one revisits concepts, theories and paradigms to understand more fully what one is observing. According to Becker (2009: 545), this iterative process means that qualitative researchers “start out with ideas, orienting perspectives, or even specific hypotheses, but once they begin, they investigate new leads; apply useful theoretical ideas to the (sometimes unexpected) evidence they gather; and, in other ways, conduct a systematic and rigorous scientific investigation”.

Ensuring that every possible nuance of the information supplied had been analysed meant examining and revisiting the quantitative results, the qualitative answers, and the focus group and interview transcripts. Information that appeared to contradict the main threads of the analysis was re-examined and highlighted in the discussion of the findings.

4.10.4 Theory Development

Ideas and themes arose from the coding of data discussed later in this chapter.

The development of theory arises out of an examination of the minutiae of the data, to create a conceptual and theoretical foundation for understanding the target phenomenon. This thesis presents a newly developed theory to provide a platform for further research into the quality assurance of post-school private providers.

Morse, *et al.* (2002: 19) maintain that these criteria, “contribute to and build reliability and validity, thus ensuring rigor” of the research.

4.11 GENERALISABILITY OR TRANSFERABILITY

In quantitative terms, generalisability means the extent to which the research findings and the conclusions of the research apply to the real world. (As indicated in the first bullet below, the findings are generalised to the population from which a sample was drawn). “Transferability” is an equivalent term used in qualitative research. However, it is not always

the case that good research will reflect the real world, since “we can only measure a small portion of the population at a time” (Experiment-Resources.com, 2012: n.p.).

Yin (2003: 31) describes two types of generalisation, namely: "analytic generalisation" and "statistical generalisation," respectively.

- Analytic generalisation is not “generalisation to some defined population that has been sampled, but rather relates to a theory of the phenomenon being studied, a theory that may have much wider applicability than the particular case studied. In this, it resembles experiments in the physical sciences, which make no claim to statistical representativeness, but instead assume that their results contribute to a general theory of the phenomenon”.
- A statistical generalisation is a statement, which is usually but not always true (this kind of statement could lead the researcher to potential fallacious, automatic generalising of a finding to a universal population [Yin, 2011: 20]).

Generalisation to situations other than those identical to the experimental situation helps to reduce scepticism. However, it is highly unlikely that every single element in an experiment could be repeated exactly, making statistical provision unfeasible. Generalisation usually derives only from logical considerations (Neufeld, 1970: 445). In qualitative research, logical considerations contribute to generalisable or transferable results (the latter term often being preferred by qualitative researchers) via extrapolation to similar situations (Golafshani, 2003: 600).

The problem in qualitative research is that there is usually only a small number of participants. This restricts the ability of researchers to understand the diversity and heterogeneity within the population studied, and can lead to “simplistic or partial accounts that exaggerate the uniformity of the phenomenon or impose a single model that only fits a part of the population” (Maxwell, 2007: n.p.). Addressing this problem requires using a relatively large, mostly homogeneous sample with some variations. For example, the homogeneity of the tuition providers arises from the fact that they are all accredited and have had to comply with standard accreditation and quality assurance policies and procedures. The variations include that they:

- range from survivalist, small, world-competitive small-scale, to large (in terms of SAQA’s (2004: 12) classification);

- operate in urban and rural settings;
- offer a wide range of different programmes and courses (whole qualifications, unit standards training, skills programmes, or short courses); and
- operate at FET and HET levels, some across both; some at one or the other.

The results are therefore limited to internal generalisability, which is acceptable because external generalisability is not crucial in qualitative studies (Maxwell, 2005: 115). However, in the current instance, the results should also have face generalisability, meaning that there is “no obvious reason not to believe that the results apply more generally” (*ibid.*).

With these frameworks in mind, I can discuss the adopted approach in detail.

4.12 ANALYSIS OF THE DATA

I classify myself as a novice researcher with some expertise in qualitative analysis but little expertise in quantitative analysis or knowledge of statistics. It is with this caveat that I offer the following explanation of how I carried out the mixed-method data analysis. Onwuegbuzie and Teddlie’s (2003: 351) framework for data analysis for mixed methods research, as shown in the Table 4.3 below, is a helpful tool:

Table 4.3: Framework for data analysis

Steps		What is required	How the research complied
Step 1	Data reduction	Reducing large amounts of qualitative data into meaningful wholes	Thematic analysis and coding were applied.
		Reducing large amounts quantitative data by means of descriptive statistics	Averages, percentages and counts were applied.
Step 2	Data display	Describing the qualitative data and quantitative data pictorially.	Charts, graphs and tables were compiled.
Step 3	Data transformation	Converting quantitative data into narrative data that can be analysed qualitatively and/or converting qualitative data into numerical codes that can be represented statistically.	Each chart, table and graph was discussed narratively. No conversion of qualitative data was done.
Step 4	Data correlation	The quantitative data being correlated with the qualitized data or the qualitative data being correlated with the quantitized data. The terms qualitized and quantitized were first coined by Tashakkori and Teddlie, (1998) as cited in Teddlie and Tashakkori (2003: 332). The data correlation stage is appropriate if the purpose of the mixed methods research is triangulation, which is one of the purposes of the selected research approach for this study.	The qualitative analysis was carried out in conjunction with the quantitative analysis in order to give a composite picture of the results.

Step 5	Data consolidation	Combining the quantitative and qualitative data into new or consolidated data sets.	The qualitative data were presented in the form of mind-maps which gave an overall rather than a disparate view of the various participants.
Step 6	Data comparison	Comparing data from the qualitative and quantitative data sources to find the overlaps, similarities and potential anomalies.	The narrative pointed out similarities and differences found within and between the various data sources.
Step 7	Data integration	Creating a coherent whole or two separate sets (i.e., qualitative and quantitative) of coherent wholes.	The data from all data sources were combined into a coherent whole which formed the foundation for the conclusions and recommendations.

(Source: Onwuegbuzie & Teddlie, 2003: 351)

The process ended with the legitimization step, which involved assessing the reliability and trustworthiness of both the qualitative and quantitative data and subsequent interpretations.

4.12.1 Qualitative Analysis

Tere (2006: n.p.) states that qualitative analysis can be regarded as a continuum, with highly qualitative, reflective types of analysis at one end, and on the other end, those which treat the qualitative data in a quantitative way, by counting and coding data. This can consist of indexing, coding, sorting, retrieving or otherwise manipulating data (“data reduction, data display and conclusion drawing and verification” [Miles & Huberman, 1994: 10]). In other words, the focus is on the procedures of analysis and the interpretation of the data, or, as Coffey and Atkinson (1996: 7, 10) put it, “an imaginative, speculative, artful, flexible and reflexive analysis”.

There are many methods described in the literature but the current research used the following three.

4.12.1.1 Thematic analysis

“Thematic analysis” was data analysed by theme (Tere, 2006: n.p.). This type of analysis is inductive, allowing the themes to emerge from the data without the preconceived ideas of the researcher interfering in the process. In this type of analysis, data collection and analysis usually take place simultaneously. Even background reading and the literature review can form part of the analysis process, especially if it can help to clarify an emerging theme. Thematic analysis involves coding which is discussed in detail below. This supported the fourth criterion for data integrity, namely the development of theory, as discussed earlier (Morse, *et al.*, 2002: 18).

4.12.1.2 Comparative analysis

Closely connected to thematic analysis is comparative analysis (Tere, 2006: n.p.; Gibbs, 2010: n.p.) where data from different settings, groups or time periods is analysed to identify similarities and differences. Tables or matrices present the comparisons. The data from different people was compared and contrasted, and the process continued until the researcher was satisfied that no new issues can be found. This compared the experiences of the principals/accreditation managers of private tuition providers, the CEOs of professional bodies, the ETQA managers and the members of the SkillsUniverse forum. Comparative and thematic analyses are often simultaneous, with the researcher using transcripts, notes and the literature review as points of reference.

4.12.1.3 Coding

Patton (2002: 465) states that coding provides a framework for organising collected data, and provides a platform for the interpretation to follow. It is an exploratory process commencing with open coding, while developing initial categories by considering the data in minute detail. Looking for themes involves coding. This means the identification of passages of text or other information and applying labels to them to indicate that they are examples of some thematic idea or pattern (Babbie, 2010: 400). A key feature of the current research was coding that “readily applies to the coding of open-ended questionnaire responses” (Babbie 2010: 406).

The coding took several forms. The categories used were both very specific (e.g. use of a given word) or general (e.g. theme of the communication). Coding categories need to reflect the content of the communication accurately and precisely. The coding undertaken in this research related to the conceptual framework discussed in Chapters 2 and 3. This was selective coding (Gray, 2009: 508) where one systematically codes with respect to a core concept. While this was not intentional during the literature study, it seems to have amounted to coding by default and amounts to “*a priori* coding” (Mills, Eurepos, & Wiebe, 2010: 227) by establishing categories based upon some theory prior to the analysis. Chapters 2 and 3 showed that the conceptual framework underpinning this research consists of the macro- and micro-elements of quality assurance in education (Fig 2.1). The microelements became the variables for the study in Chapter 5 since it was limited to providers in South Africa.

Jansen (2010: n.p.) states that “the core task in coding is to determine the relationship between the data fragment and the knowledge aims of the study” and requires “theoretical sensibility and creativity”. It is a “dynamic, intuitive and creative process of inductive

reasoning, thinking and theorising” (Basit, 2003: 143). In other words, it is not merely a mechanical exercise but an active and purposeful search for meaning.

Leech and Onwuegbuzie (2007: 563) identify the following qualitative data analysis tools, among others: method of constant comparison, keywords-in-context, word count, and classical content analysis. These were the most appropriate tools for purposes of the current research.

Constant comparison (Leech & Onwuegbuzie, 2007: 565) was an approach I used in the current study, and comprised:

- a deductive approach where codes were identified *a priori* and then looked for in the data;
- an inductive approach where codes emerged from the data (*a posteriori*).

This method supported the investigation of the “overarching question” (*ibid.*: 576), namely: what are the quality assurance challenges that post-school private education and training providers experience?

The constant comparison approach uses the keywords-in-context (KWIC) analysis first discussed by Fielding and Lee (1998 cited in Leech & Onwuegbuzie, 2007: 566) “that reveals how respondents use words in context by comparing words that appear before and after key words”. For example, the word “frustration” might appear in a transcript or answer to an open-ended question, but if it appears together with “regulatory authorities” or “lack of in-house expertise” the key word, “frustration” would imply different things. Keywords were chosen through previous research or theory (i.e., *a priori*), and determined by frequency of use throughout the data set (i.e., *a posteriori*).

A third mechanism is “word count” which is “based on the belief that all people have distinctive vocabulary and word usage patterns” (*ibid.*: 567) that would highlight a recurring theme. A caution here is that decontextualisation may be a problem that could lead to a misinterpretation of the results. This technique is common in analysing transcripts of focus groups, so it is appropriate for this thesis. However, I elected to code cognitive and semantic chunks as opposed to coding or counting words, in order to see the context in which the word was used (Gustafsson, 2006: 78, 80). I attempted to gain a deeper understanding of what I had studied and continually refined my interpretations. This process was adapted from Neuendorf (2009: 67-83).

All the narrative data collected was coded. Essentially this consisted of coding the answers to the open-ended questions in the questionnaires, the focus group transcript and the semi-structured interview transcripts. Table 4.4 below indicates the *a priori* coding:

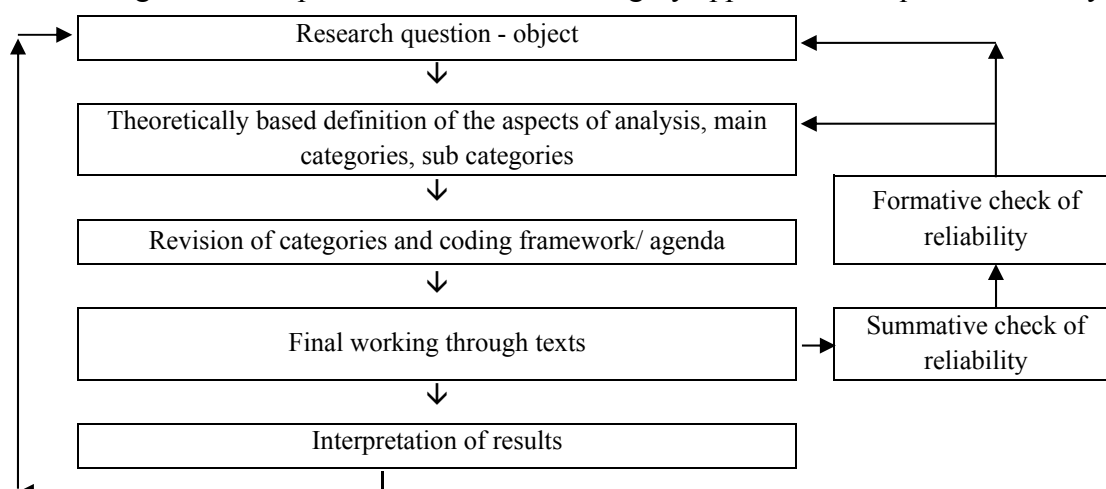
Table 4.4: *A priori* coding framework

Major Coding Categories for Social Research	Major themes	Associated concepts
Acts/activities	Accreditation	Requirements, ETQA, need
Meanings/definitions	Quality assurance	Inspection, process control, auditing, standards and ISO 9000
Acts/activities/events	Registration	Requirements, Department, need
Processes/methods	Frustrations	Policies, people, application of standards
Perspectives	Problems	Attitudes, perceptions, misunderstanding, resources, ethics
Perspectives	Positive aspects	Policies, people
Participation/strategies	Alternatives	Proposals, suggestions
Settings/context	Types of providers	FET, HET, ABET, mixed, SMME, NGO, for-profit, not-for-profit, workplace
Settings/context	Programmes	Full qualifications, unit standards, part qualifications, short courses
Settings/context	Funding	Students fees, learnerships, grants
Relationships/social structures	Stakeholders	Consultation, workshops

(Source: Lofland, 1971: 14 -15; Lofland, *et al.* 2006: 121; Bogdan & Biklen, 2007: 174 – 176)

To uncover the essential features of the issues under investigation and to outline the generalisable features among them, the returned questionnaires, focus group transcripts and interview transcripts were coded by creating a series of mind-maps to identify emerging themes. This then allowed for systematic organisation and coding of the data to facilitate extraction of significant statements. Analysis of the literature on quality assurance in post-school education and training as detailed in Chapters 2 and 3 provided the coding framework. Table 4.3 lists excerpts from texts assigned to one or several activities. Activities not correlated with any codes presented in the tablet were coded as “other” and thus kept in the coding framework. This allowed for possible development of previously unidentified additional themes. This speaks to the iterative nature of exploratory research (Marshall & Rossman, 1999: 26). The coding procedure is conceptualised in figure 4.2 below:

Figure 4.2: Step model of deductive category application for qualitative analysis



(Source: Mayring, 2000: 2)

4.12.2 Quantitative Analysis

Quantitative data analysis makes use of descriptive statistics including measures of central tendency (averages – mean, median and mode) and measures of variability about the average (range and standard deviation) (Cohen, *et al.*, 2007: 507). Displaying these by means of charts and graphs gives the reader a ‘picture’ of the data that has been collected and used in the research project (Mendenhall, Beaver & Beaver, 2009: 4). In addition, inferential statistics draw conclusions about a whole population from a representative sample and make predictions about the characteristics of that population (*ibid.*).

Quantitative research may well generate huge amounts of data. For example, a small study that distributes 100 questionnaires with 20 items on each can generate potentially 2 000 items of raw data. Extrapolating this to the current study, the number of items of raw data was as follows (Table 4.5):

Table 4.5: The number of data items for analysis

Research/Participant group	Research instrument	Number of participants	Data items for analysis
Principals/accreditation managers of private tuition providers	Survey questionnaire	93	$93 \times 28 = 2\ 604$
CEOs of professional bodies	Survey questionnaire	7	$7 \times 14 = 98$
ETQA managers	Survey questionnaire	0	0
Focus group members	Focus group question schedule	Between 23 and 7 (Av. 15)	$15 \times 10 = 150$
CEOs of professional bodies	Semi-structured interviews	1	10
ETQA managers	Semi-structured interviews	1	10

Actual numbers with regard to the surveys depend on response rates. To make sense of these data, they need to be summarised in a meaningful way. Presentation of typical values as well as variances in the data create a mental picture of the data and the people, events or objects they relate to. Experiment-Resources.com (2011: n.p.) states that “Quantitative studies usually require extensive statistical analysis, which can be difficult, due to most scientists not being statisticians. The field of statistical study is a whole scientific discipline and can be difficult for non-mathematicians.” This is my position in this study. However, the Surveygizmo.com online survey facility used to deliver and collect the surveys was very

useful in providing basic statistical analysis and allowing for the drawing of graphs from the data to present the information in a coherent way.

All quantitative studies have some descriptive statistics, usually accompanied by frequency tables. This is the focus of this thesis, and there is no need for deeper inferential statistical analysis. The two main types of descriptive statistics used in research papers are measures of central tendency, (averages, modes or means), and measures of dispersion (range and standard deviations). This thesis used measures of central tendency and not measures of dispersion.

The choice of which particular descriptive statistics to report may affect the data “picture”, with the potential to mislead if care is not taken (Mooi & Sarstedt, 2011: 83). To counteract this, the data are displayed in various ways, for example in bar graphs and pie charts with data tables.

4.13 ETHICAL CONSIDERATIONS

The research followed the code of ethics for research at University of South Africa, reflected in section 7 of the document (University of South Africa, 2007). The ethics committee of UNISA approved the research design and the questionnaire, and I adhered to the guidelines throughout. All sources of information and data used in the research have been acknowledged according to the prescribed methods. Further, I was sensitive to ethical principles guiding research with humans such as confidentiality, anonymity, privacy, obtaining consent and approval, harm, and termination of research. Other ethical guidelines, as per Leedy and Ormrod (2005: 101), include:

- protection from harm – either physical or psychological harm where, for example, people might feel coerced or stressed by participating; or they might fear reprisals from the authorities should they express a negative opinion;
- informed consent – participants must be provided with full information about the project so that they can decide for themselves whether they wish to participate or not;
- the right to privacy – the personal details of participants should be protected; and
- honesty – the purposes of the research must be clear and transparent.

In order to protect the participants from harm, I ensured that the risk of participating in the study was minimised. Prior to the research, I informed the participants of the nature of the

study, and that each of those selected had a choice to take part voluntarily. The participants in the online survey received an introductory letter explaining the purpose and intent of the research in lieu of an informed consent form. Since it was not possible to get a signed consent form from these participants, two questions at the beginning of the survey provided confirmation that they had read the letter of informed consent and agreed to participate voluntarily. If they said no, they were asked to exit the survey. No persons were compelled or induced to participate.

In carrying out the semi-structured interviews, I advised the participants when I made the appointments for these interviews that they would be recorded for transcription purposes. In addition, I advised the focus group that their answers would be transcribed and used for analysis. The focus group was a closed online group, and participation was by invitation only, so the discussion as not viewable by the public, thus assuring confidentiality.

Identification of individual participants was not necessary for the research, so the discussion avoided identifiers in the discussion as far as possible, thus securing the right to privacy and anonymity. The identifiers were limited to:

- Private provider;
- CEO;
- ETQA Manager; and
- Focus group member.

In addition, no person apart from the researcher has access to the participants' identity and even that was limited by using email addresses of organisations instead of personal contact details. The provision of such details was not required. The UNISA Research Ethics Clearance Committee approved the study on 31 January 2013.

4.14 CHAPTER SUMMARY

This chapter provided a detailed account of the research philosophy, strategy and methodology constraining the research. I adopted a constructivist, pragmatic and interpretivist approach, with some elements of positivism, utilising a mixed methods paradigm. Methods of data collection were examined and various methodologies described, with the use of both qualitative and quantitative methods (surveys with intra-method mixing, semi-structured interviews and an online focus group) being justified as the most appropriate

methodologies to use to achieve the objectives of the study. This chapter also discussed the processes used in the data gathering, addressing the issues of reliability and validity associated with the study. The coding system used to carry out the thematic and comparative analysis was also outlined. Finally ethical measures taken in carrying out the research were highlighted.

The next chapter provides the results and analysis of the field study in terms of the research design.

CHAPTER 5

DATA ANALYSIS AND FINDINGS

5.1 INTRODUCTION

Chapters 1 to 4 laid the background to the study, with the following research objectives in mind:

- to determine the *raison d'être* of the private provider
- to understand why quality assurance has become such a critical focus in education;
- to examine what mechanisms have been put in place in the South African education and training system to instil a quality assurance mindset or culture into all the various stakeholders;
- to identify what problems there are with existing quality assurance policies, practices and processes; and
- to understand how private providers manage quality assurance in their respective organisations;
- to determine whether there are alternatives to the current models and paradigms of quality assurance in private post-school education and training in South Africa.

Chapters 2 and 3 addressed the first three objectives in depth. In order to address the last three objectives, this chapter will involve an in-depth analysis of the data collected via surveys, semi-structured interviews and a focus group discussion.

5.2 LIMITATIONS

Before I start the analysis, it is important to note certain statistics that arose out of the survey. The survey for principals and accreditation managers of private tuition providers sent was sent to 4996 email addresses, of which 1337 “bounced” or were undeliverable. This supports the finding by Blom (2011: 15) (referred to in Chapter 2) that the databases of the regulatory authorities are both incomplete and badly managed. After eliminating all the erroneous email addresses, a reminder email was sent five days after the initial email. The provider survey was eventually answered by 159 respondents. Of these, 66 were partial responses, meaning that some participants started the survey but then did not complete the questions. These responses were not included in the analysis below as completion was so erratic that inclusion would have skewed the results.

In terms of responses from the CEOs of professional bodies, only 10 responses came back from 39 sent. Of these 3 were partial responses, with only one or two questions answered so

they did not provide much useful information. Only the 7 completed responses have been included in the discussion below.

A serious limitation to the findings was the total lack of response to the online survey by the ETQA managers. Nine of the 23 email addresses taken from the SAQA website bounced. It is clearly out of date. Only one partial response was received in which the respondent answered two questions, namely that s/he had read the letter of informed consent and agreed voluntarily to participate in the survey. Thus, that response contained no meaningful information. Despite a reminder invitation five days after the initial invitation went out, there were no further responses. The reason for this state of affairs is unknown, but may illustrate the lack of responsiveness indicated by numerous private providers on the survey. We return to this below. The limitation placed on the results is that triangulation of the findings from this perspective is not possible. I consequently used the in-depth semi-structured interview with the ETQA Manager as a means of triangulation. The response rates are summarised in Table 5.1 below.

Table 5.1: Sample sizes and response rates

	Principals of private tuition providers	CEO Survey	ETQA Manager Survey
Distributed	4996	39	23
Undeliverable	1 337	-	9
Returned questionnaires	160	10	0
Rejected due to non-completion*	66	3	0
Final total for analysis	93	7	0
Response rate	2.5%	17.9%	0

*Non-completion means that the participant started the survey but only answered some of the questions.

Although the response rates appear to be miniscule and unrepresentative, it should be remembered that in Chapter 4, Section 4.7.1.6, the target response rate needed for providers was 99 (so 93 is not far off from that target) and that statistical significance from the other target populations cannot be determined because of the small target populations. The large degree of overlap in the results (discussed below) between individual providers as well as other research participants mitigated non-response bias, and the conclusion is that, because of the overwhelmingly similar findings, a higher response rate would not have made a significant difference.

The online focus group started with 23 people indicating their willingness to participate but interest waned after the first two questions had been posted. Only seven people consistently commented on the remaining questions. These were detailed comments provided by industry practitioners who have had first-hand experience of the accreditation and quality assurance regime. They are therefore invaluable for triangulation with the survey results from the

accredited tuition providers, and the semi-structured interviews conducted with the ETQA manager and professional body CEO.

A third limitation is that some of the findings in this chapter are not new or revelatory but rather serve to confirm, empirically, much of the discussion in Chapters 2 and 3.

5.3 THE CODING FRAMEWORK

Although my original intention was to use a software analysis programme (Dedoose) designed to assist with mixed methods research analysis, I found the programme complicated, making it difficult to extract any meaningful data for presentation. I therefore reverted to a manual inductive approach geared to identifying patterns in the data by means of thematic codes (Hammond & Wellington, 2013: 107). In this case, the *a priori* coding suggested in Chapter 4 proved to be correct, as the codes did indeed emerge from the empirical data. The only code removed from the original plan was “registration”, which turned out to be redundant and synonymous with accreditation. The qualitative information supplied in the surveys, the interview transcripts and the focus group transcript all underwent inductive analysis. The final coding framework in the qualitative analysis is highlighted in Table 5.2 below.

Table 5.2: Final coding framework

Major Coding Categories for Social Research	Major themes	Associated concepts
Acts/activities/events	Accreditation	Requirements, ETQA, need
Meanings/definitions	Quality assurance	Inspection, process control, auditing, standards and ISO 9000
Processes/methods	Frustrations	Policies, people, application of standards
Perspectives	Problems	Attitudes, perceptions, misunderstanding, resources, ethics
Perspectives	Positive aspects	Policies, people
Participation/strategies	Alternatives	Proposals, suggestions
Settings/context	Types of providers	FET, HET, ABET, mixed, SMME, NGO, for-profit, not-for-profit, workplace
Settings/context	Programmes	Full qualifications, unit standards, part qualifications, short courses
Settings/context	Funding	Students fees, learnerships, grants
Relationships/social structures	Stakeholders	Consultation, workshops

(Source: Lofland, 1971: 14 -15; Lofland, *et al.* 2006: 121; Bogdan & Biklen, 2007: 174 – 176)

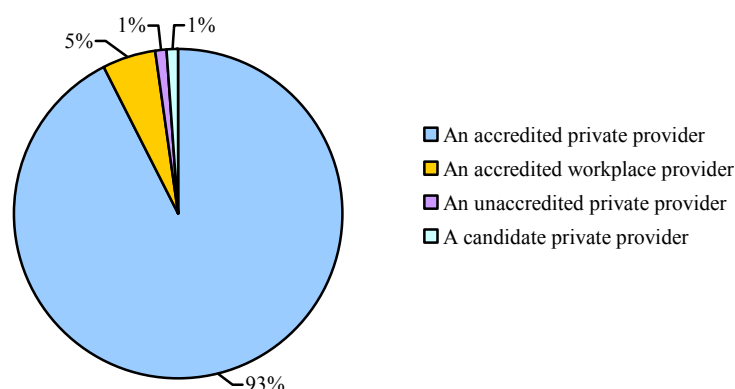
An in-depth and iterative analysis of the transcripts and qualitative answers from the questionnaires validated the general correctness of the coding framework. This highlighted the keywords and phrases and thereby confirmed the relevance of the *a priori* coding approach. A series of mind-maps¹⁰ revealing the form and substance of the findings encapsulated the coding. Quantitative analysis is limited to tables and charts derived from the surveys, which provide a picture of the private provider that is elaborated on in the qualitative discussion.

5.4 THE RAISON D'ÊTRE OF THE PRIVATE PROVIDER

5.4.1 The Composition of the Respondent Sample

The respondent sample comprised the whole range of providers in terms of SAQA's classification (SAQA, 2004: 7), although the vast majority (93% n86) were accredited private providers. The pie chart below shows the composition of the sample.

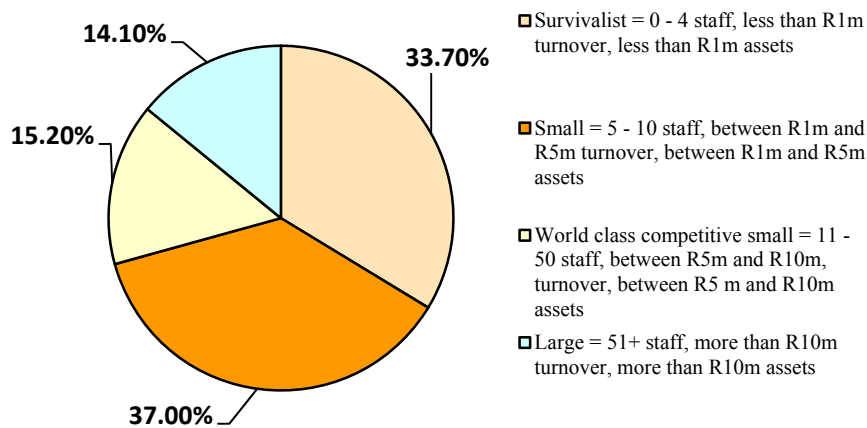
Figure 5.1: Composition of respondent sample



The preponderance of survivalist and small providers in the group, namely 71% (n76) as shown in Figure 5.2 below, is noted.

¹⁰ The programme used to create these mind-maps was Freemind.

Figure 5.2: Size of providers in terms of SAQA’s provider classifications



While the low response rate means that these findings cannot be generalised to the whole population, the findings nevertheless support the research findings of the DTI (2008: 163) and Blom (2011: 36) mentioned in Chapter 1, which concluded that the majority of private education providers were either micro enterprises or very small enterprises.

5.4.2 PROGRAMME OFFERINGS

The next few graphs (Figures 5.3, 5.4, 5.5 and 5.6) and Table 5.3 show the range of programme offerings within the survey group.

Figure 5.3: Number of providers offering whole qualifications

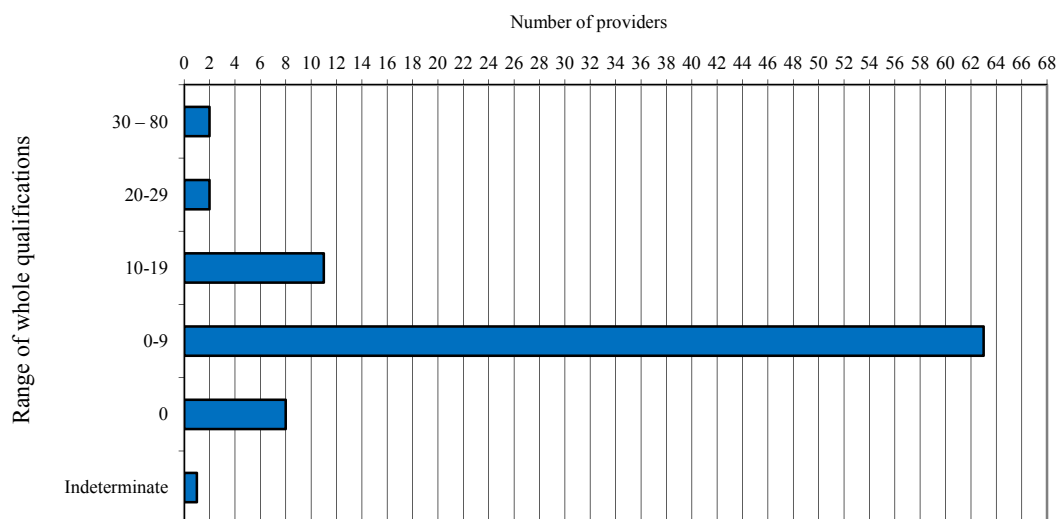


Figure 5.4: Number of providers offering unit standards

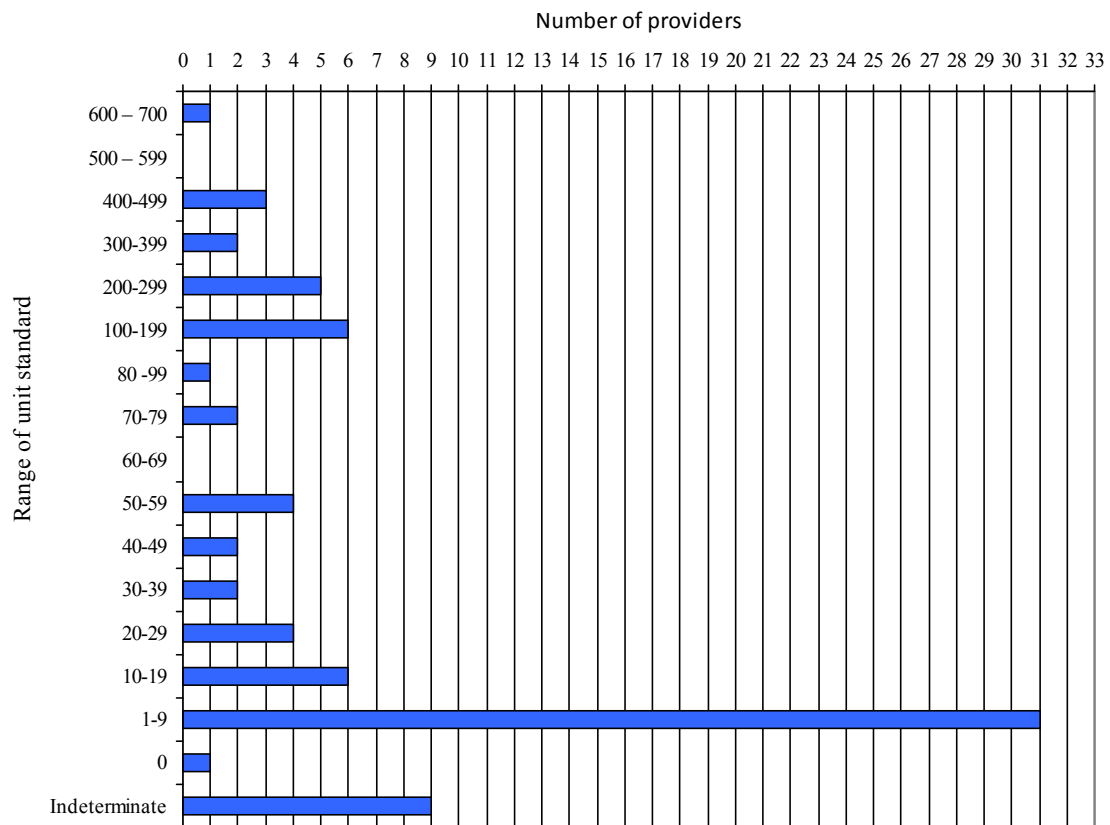


Figure 5.5: Number of providers offering short courses

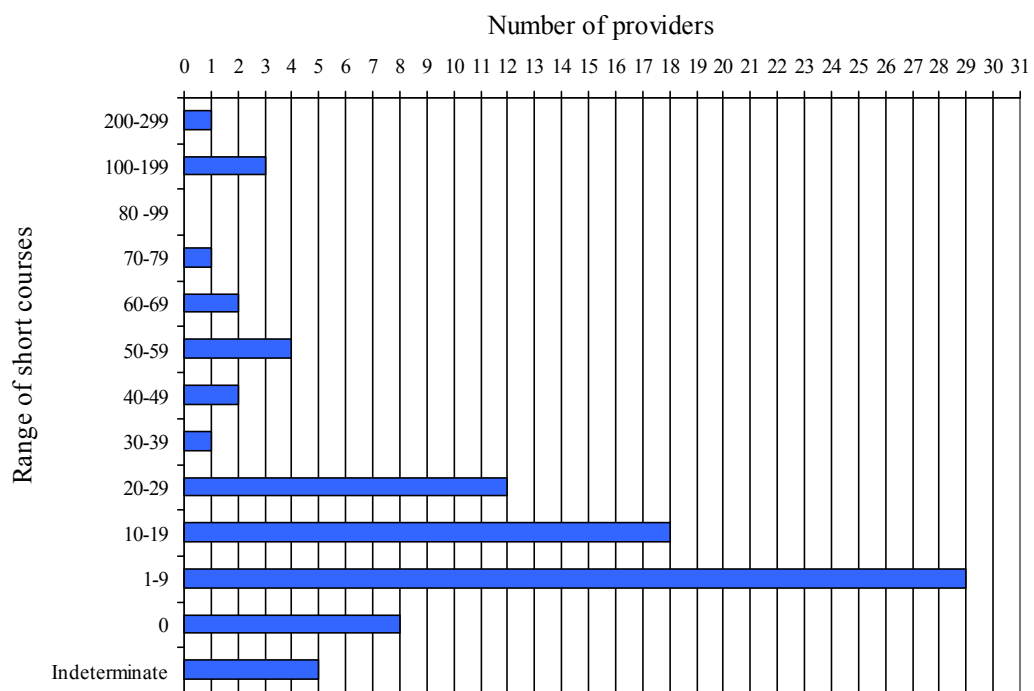
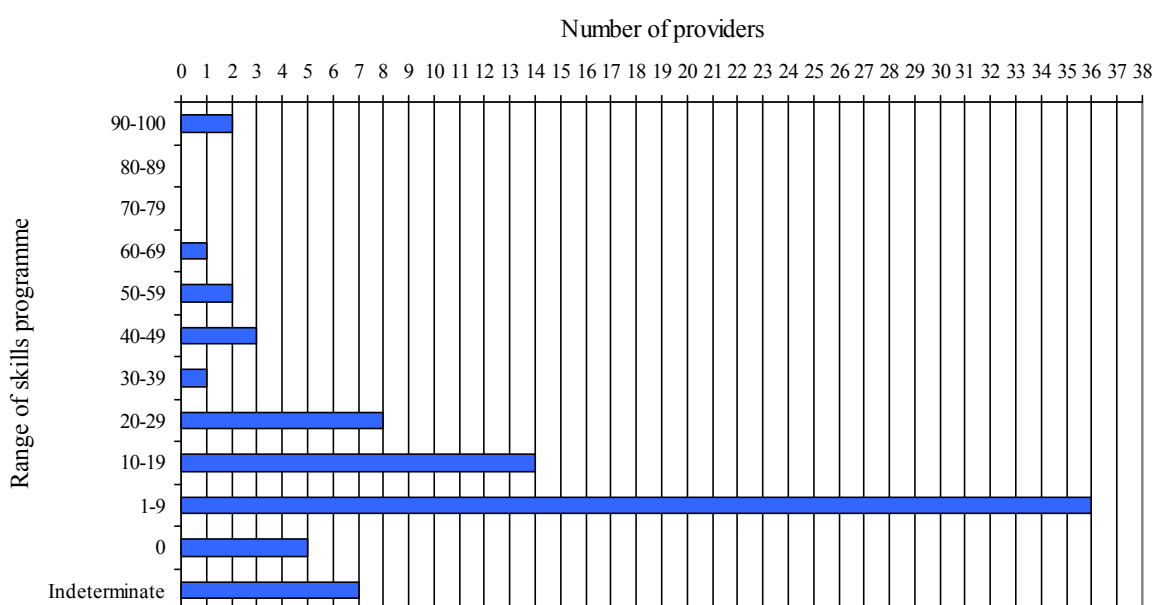


Table 5.3: Average duration of short courses per provider

Number of providers	Duration of short courses
5 providers	1 – 1 ½ years
19 providers	8 – 24 weeks
70 providers	½ – 10 days
4 providers	0
1 provider	Indeterminate

Figure 5.6: Number of providers offering skills programmes



These graphs show that the full range of types of qualifications is offered by the tuition providers, with larger organisations offering greater numbers of each kind of qualification, and the bulk of smaller providers offering unit standards, skills programmes and short courses which range in duration from half a day to 1 ½ years. Table 5.3 confirms the findings of Akoojee (2005: 27; Chapter 2, Section 2.14.2) that many private providers do not offer whole qualifications (i.e. full-time year-long programmes), preferring rather to offer smaller and shorter, more tailored programmes to their clients (both students and employers).

The literature review (Section 2.14) mentioned that employers find short, tailor-made programmes more suitable for upskilling their staff than lengthy full-time courses. This also supports the finding of the DHET (2012: 15; Chapter 2, Section 2.14.2) that there is a proliferation of unit standards and qualifications. It may also be the reason why the of

Minister Higher Education and Training, Dr Nzimande (in Polityorg.za, 2011: n.p.; Chapter 3, Section 3.8.8.2) was reported as saying that a whole industry of short courses with “dubious value” had come into being as a result of the establishment of the SETA system. A number of providers were not able to quantify exactly how many programmes they were offering (hence the indeterminate indicator on each of the graphs). This is attributed to the short duration of the survey and it is not the kind of information respondents “carry in their heads” so to speak.

5.4.3 Learner Profiles

The issue of equity and access was raised in Chapter 3, Section 3.8, and that was the reason for including a question on the student profile of the private providers. The questions focused on race, educational background, socio-economic status, and demographic information like age and nationality. The statistics below confirm the findings of Baumgardt (2011: 3) as discussed in Chapter 2, Section 2.13.

The majority of providers of all sizes (64 of the 93 respondents) cater for all race groups, with five stating that they only had white male learners and 24 stating that they catered almost exclusively for black students. Most providers (83 of the 93) cater for a range of students from matriculants to people with tertiary qualifications, while ten indicated that they cater mostly for non-matriculants. Most providers (81), irrespective of size, have a mixed group of students, employed and unemployed, with only a few (12) stating that they had only unemployed or self-employed learners.

The majority of providers (60) stated that they only have South African students while 33 reported that their student populations included foreign students as well, mainly from South Africa’s neighbouring states.

Thirty-five of the survey respondents indicated that learners were self-funded, and this was often related to being poor or unemployed, although not in every case. The funding of the remaining learners came from company sponsorship, or learnership funding, with two providers stating that their funding came from donor organisations.

These statistics indicate that there is little discrimination based on race, age or socio-economic status amongst private providers, so it appears that equity (Chapter 3, Section 3.8) is not problematic.

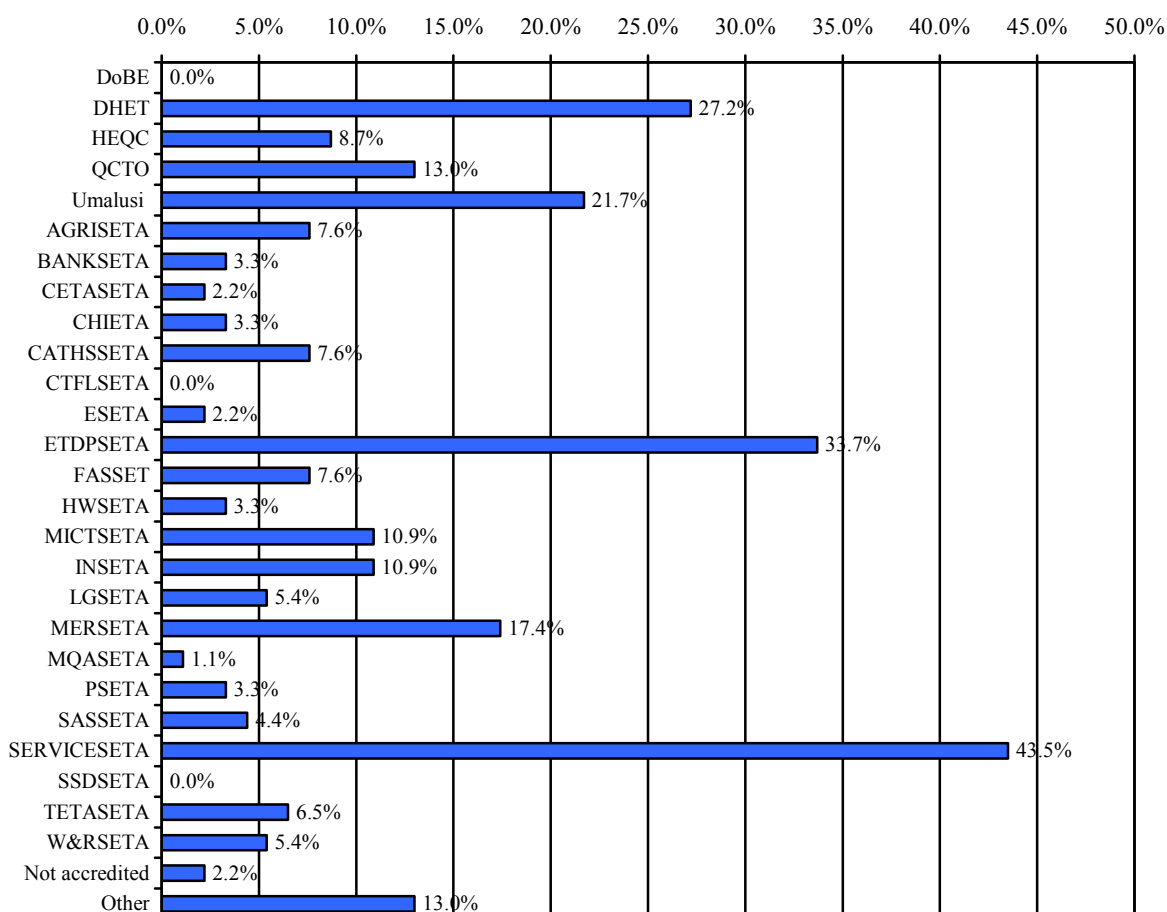
5.4.4 ETQA Accreditation

The questionnaire went to accredited private providers, so the questions in this part of the survey aimed at determining their links to accrediting bodies. The object of the question was to investigate whether the providers were spread across all industrial sectors as highlighted in

Chapter 2 (Section 2.8), as well as the distribution between the DHET, Umalusi and the QCTO. The purpose was to determine whether the experience of the providers was the same across all sectors and NQF levels.

The following bar graph (Figure 5.7) shows that the respondent sample spread across most of the ETQAs, with the exceptions of the SSDSETA, the CTFLSETA and the DoBE, where there were no respondents. The CTFLSETA did not supply me with their database of accredited providers. CETA and TETA providers found their way into the results although these databases were not directly available. It is not clear how this occurred but could be attributed to accreditation by more than one SETA. Although listed as a SETA, the SSDSETA seems to be a non-entity. DoBE is concerned with school education, and not with post-school education and training. Of the 93 respondents, two indicated that they were not accredited, which is surprising since their details were obtained from at least one of the SETA databases.

Figure 5.7: ETQA accreditation of private providers in the sample group



The questionnaire listed as choices all the SETAs and regulatory bodies, but fourteen respondents (13%) indicated “other” as their choice. The survey did not ask for elucidation on this category. Because it constitutes a substantial percentage of the respondents, it

remains a problematic grey area. Some providers might believe that affiliation with private bodies such as APPETD and other interest groups and industry associations, or quality assurance in terms of ISO 9000 or Six Sigma provides them with acceptable credentials, although why this should be the case, is unknown. The data reveal that many providers are accredited by more than one SETA, which contravenes the principles of one-provider-one-SETA (SAQA, 2009: 9; Chapter 4, Section 4.6.3). This could be due to cross-SETA accreditation via the mechanism of memoranda of understanding (Chapter 2, Section 2.8.4). It also appears that those providers with dual accreditation choose this as an option to suit their business models in offering a range of different courses.

Another interesting finding is that 95.7% of the sample supported the idea of accreditation, while 94.6% said that quality assurance was a business imperative. The fact that providers in the main support both these processes indicates their willingness to comply with the established regulatory system. The Professional Body CEO and the ETQA manager also voiced their agreement that both processes are essential. The findings on the statements regarding accreditation are reflected in Table 5.4 below:

Table 5.4: Survey responses to statements on accreditation

	Yes	No	Responses
I support the idea of accreditation.	95.7%	4.3%	93
Accreditation adds value to my business.	92.5%	7.5%	93
I use my accreditation status to market my courses.	92.4%	7.6%	92
Accreditation is perceived with value by my clients.	87.0%	13.0%	92
Accreditation has a beneficial effect on overall competitiveness of training providers.	78.5%	21.5%	93
Accreditation should be an option for private providers.	51.1%	48.9%	90
Once a provider has been accredited, this should be sufficient unless there are complaints about the organisation.	67.0%	33.0%	91
Accreditation has helped us to improve our pass rates.	34.8%	65.2%	89
Costs of accreditation should be borne by the government.	56.2%	43.8%	89
Costs of accreditation should be charged on a sliding scale depending on the provider's annual turnover.	54.4%	45.6%	90

The questionnaire advised respondents at the start that they were free to omit any questions they did not feel able or willing to answer, which accounts for the minor discrepancies in the total responses indicated. For example, four respondents omitted answering the question

“Accreditation has helped us to improve our pass rates”. Chapter 1 highlighted the issue of pass rates (Section 1.4), by raising the question of whether quality assurance systems have indeed resulted in improved output of academic and training programmes. That is, have they improved performance and competence of students who are the products of the tuition providers in question? The fact that 65.2% (58) of respondents answered “no” speaks to this issue. Table 5.5 below reflects the findings on statements about quality assurance. Again, 61.1% (55) of respondents said that quality assurance had not helped them to improve their pass rates.

Table 5.5: Survey responses to statements on quality assurance

	Yes	No	Responses
Quality assurance is a business imperative for our organisation.	94.6%	5.4%	93
A private provider should only need to be quality assured by one quality assurance body.	76.1%	23.9%	92
As a private provider, we should be allowed to choose our own quality assurance model.	59.1%	40.9%	93
The government has too much influence in private education and training.	72.8%	27.2%	92
Site visits are an essential part of an accreditation audit.	89.1%	10.9%	92
Audits should be conducted by independent consultants not by ETQA officers.	46.7%	53.3%	92
A single version of the accreditation audit tool should be used in all sectors.	68.9%	31.1%	90
There should be different accreditation requirements for small providers.	56.5%	43.5%	92
There is sufficient stakeholder consultation by the ETQAs regarding quality assurance.	34.4%	65.6%	93
There is consistency of quality assurance practices or measures within the ETQA, e.g. different verifiers or programme evaluators have the same interpretations.	27.2%	72.8%	92
Programme evaluators should be academically qualified in the programme they are evaluating.	93.5%	6.5%	93
Quality assurance has helped us to improve our pass rates.	38.9%	61.1%	90

Surprisingly, the focus group was divided on the need for accreditation. The focus group was comprised of both unaccredited and accredited providers, as well as freelance facilitators, assessors and moderators. This question gave rise to lengthy discussion, with focus group members in favour of accreditation stating that they believe accreditation is essential, while those who indicated that accreditation was not essential stated that reputation and good service were what was needed. Accreditation did not necessarily add value in that regard. Employers used the services of the latter because the courses were short courses, tailor-made to the needs of the client. Several people in the focus group discussion commented that employers were not concerned that courses should be accredited when they were seeking to

upskill their employees, and preferred short courses that did not remove the employee from the workplace for extended periods. It would therefore seem that they find value in short courses when they are delivered by providers that have a proven track record, irrespective of their accreditation status. Notably, the provision of unaccredited programmes is not illegal in and of itself – the illegality comes in when the provider falsely claims accreditation for the programmes it is offering.

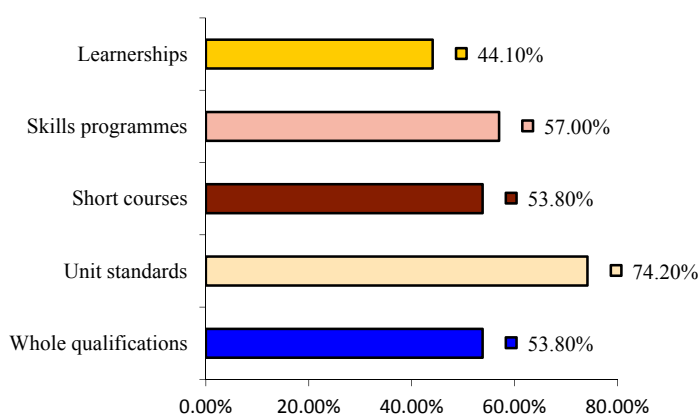
For example, a provider that is accredited for some programmes, such as unit standards, whole qualifications and/or skills programmes may then use for marketing their unaccredited short course offerings. The criticism of private providers by the ETQAs, the regulatory authorities, and the students would appear warranted as far as this is concerned (Chapter 2, Section 2.14.1).

The survey showed that providers offered a mixed bag of courses (as indicated in Table 5.6, and Figure 5.8 below and Chapter 2, section 2.14.3). The variety of offerings also clearly reflects the size of the organisation, with survivalist providers at the lower end of the spectrum offering only one or two unit standards and short courses, while large providers at the top end of the spectrum, offer multiple unit standards, whole qualifications, short courses, skills programmes and learnerships.

Table 5.6: Numbers of providers and range of courses offered

	Whole qualifications	Unit standards	Short courses	Skills programmes	Learnerships
Percentage	53.80%	74.20%	53.80%	57.00%	44.10%
Number of providers	58/93	80/93	58/93	61/93	47/93

Figure 5.8: Range of course offered by respondent providers



One member of the focus group stated that the existence of many unaccredited short courses was “a serious deficiency” in an integrated system that is not recognising short courses.

Employers need “a system where their employees can accumulate credits towards a national qualification by attending short courses” (Focus group member).

Largely positive responses supported the statements on accreditation, such as:

- “Accreditation should be a cornerstone of all training which leads to registered qualifications” (Focus group member);
- “Accreditation is a door opener” (Focus group member);
- “Accreditation gives a seal of approval and regulates to an extent what happens and does gives public some feeling of security around who they interact with” (CEO);
- “It is important to have a measure or a standard that people need to achieve” (ETQA manager).

General acceptance of the concept of quality assurance came with reservations, as indicated by the following statements:

- “This basic information should be the same across all accreditation authorities” (Focus group member) but it currently is not;
- “Just because you want to do something doesn’t mean that you will achieve the quality that is required” (ETQA manager) with some providers having unrealistic expectations and expecting the quality assurer simply to rubber stamp whatever the provider was doing;
- The government has far too much control over education (72.8% (n78) of survey respondents agreed) and “it should stay out of the private providers’ area of expertise” (Focus group member).

5.5 THE SURVEY FOR CEOs OF PROFESSIONAL BODIES

5.5.1 The Composition of the Professional Bodies

As indicated earlier, there were seven completed responses out of 39. Two of the seven confirmed accreditation by the QCTO, while the remaining five did not, indicating that they lacked accreditation by any of the Quality Councils. Two of the latter five said that they wished to be accredited by the QCTO, while the two that are accredited by the QCTO stated that they would rather be accredited by the CHE. One that is not currently accredited (but has applied) also wished to fall under the CHE. The remaining two participants did not indicate their choice.

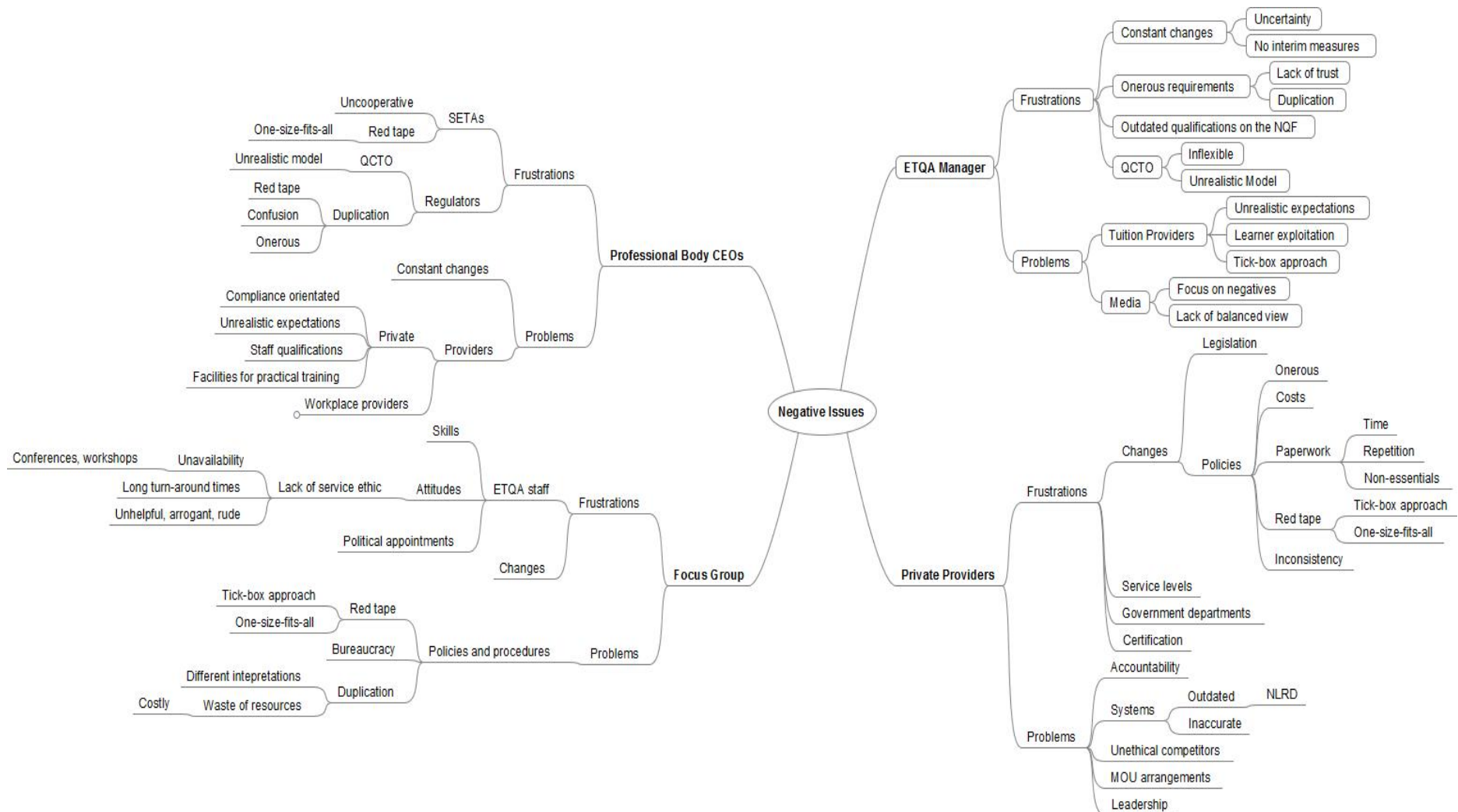
None of the participants was registered with the DHET, which is really to be expected, since in terms of the NQF Act, 2008, professional bodies are not permitted to be registered as training providers. Three of the participants stated that they were quality assured by FASSET, with one linked to each of HWSETA, MICT SETA, and SASSETA, with the last one not yet accredited by any specific SETA.

In the main, these professional bodies have not yet accredited any providers, with the following exceptions: one has accredited eight providers, and another has accredited five. Workplace providers painted an entirely different picture. One of the professional bodies indicated that it had accredited approximately 800 such providers. The majority of providers in all sectors fell into the small to world-competitive small scale in terms of SAQA's classification (SAQA, 2004: 7), with no survivalist providers indicated, and fell into the FET and HET bands in terms of the programmes they offer.

5.6 PROBLEMS WITH POLICIES, PRACTICES AND PROCESSES

The problems highlighted by every sample (providers, CEOs, ETQA manager and focus group members) are discussed below. The starting point for this discussion is the following mind-map (Figure 5.9)

Figure 5.9: Negative issues identified by all participant groups



5.6.1 Onerous Requirements

Despite seeing the value in accreditation and quality assurance, most providers found that the requirements are onerous with inconsistent application of the criteria by ETQA staff, especially among the SETAs. Accompanying this is a system of bureaucracy, red tape, and a so-called “tick-the-box” approach applied by ETQA staff tasked with evaluating the provider’s accreditation applications and the ongoing monitoring of quality assurance. In other words, the evaluator has a list of items on his compliance sheet, and simply ticks them off without any deeper interrogation or checking of evidence. For example, the provider might state that it has effective staff recruitment policies in place. This would require a check of curriculum vitae, lesson plans, student evaluation forms and the like, over and above just checking that the policy is in place, but the deeper investigation often does not happen. Moreover, in some SETAs, staff appear incompetent, unqualified, and inexperienced, more so when it comes to specific industry expertise. The findings on the Code of Conduct question (Table 5.7) and the perceived negative issues are pertinent in this regard.

Table 5.7: Compliance with the Code of Conduct for Public Servants

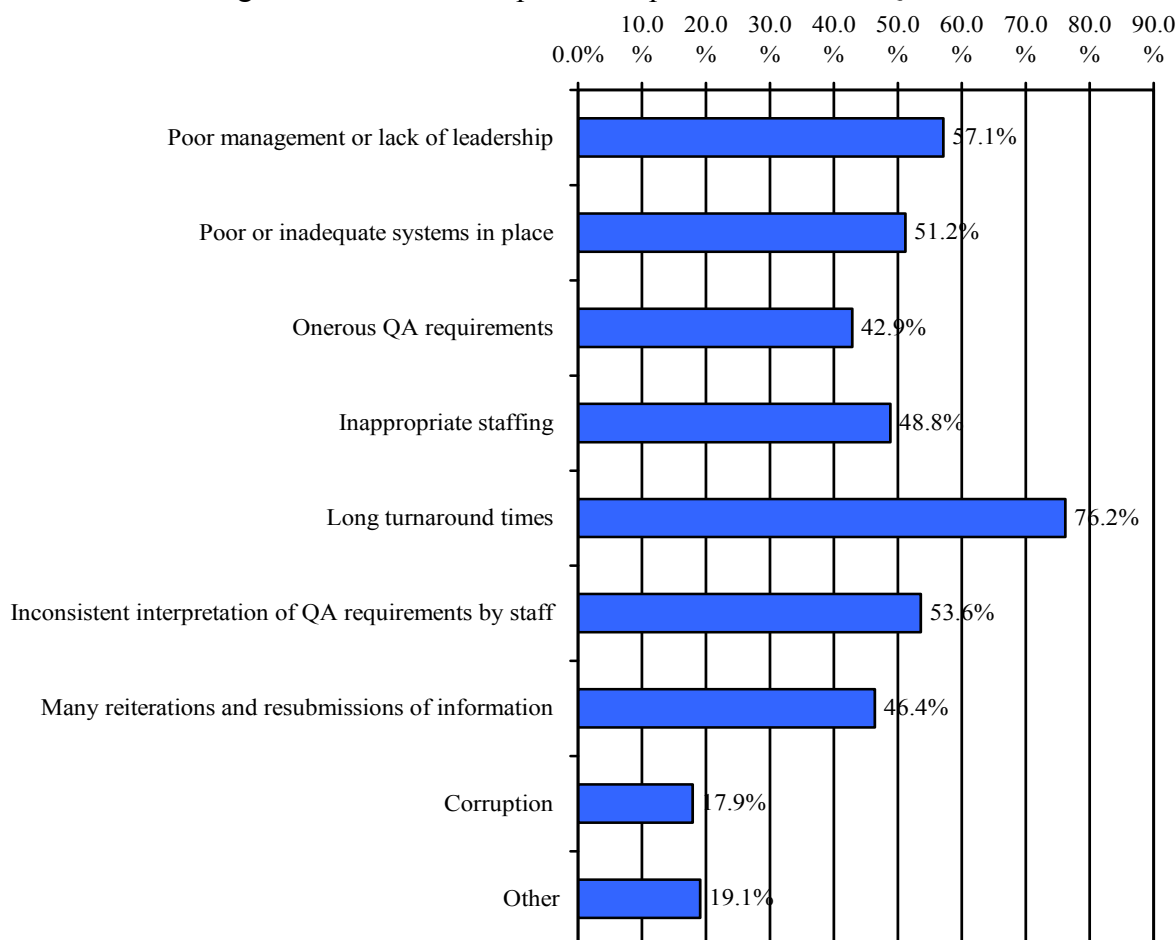
	Strongly disagree	Disagree	Agree	Strongly agree	Responses
put the public interest first in the execution of their duties?	17.4% n16	28.3% n26	40.2% n37	14.1% n13	92
Combined	46.2% (n42)		53.9% (n50)		
serve the public in an unbiased and impartial manner in order to create confidence in the public service?	20.7% n19	26.1% n24	37.0% n34	16.3% n15	92
Combined	47.3% (n43)		52.8% (n49)		
are polite, helpful and reasonably accessible in their dealings with the public, at all times	19.6% n18	21.7% n20	42.4% n39	16.3% n15	92
Combined	41.8% (n38)		58.3% (n54)		
treat members of the public as customers who are entitled to receive high standards of service?	25.0% n23	20.7% n19	35.9% n33	18.5% n17	92
Combined	46.2% (n42)		53.9% (n50)		
recognise the public's right of access to information, excluding information that is specifically protected by law?	16.3% n15	22.8% n21	47.8% n44	13.0% n12	92
Combined	39.6% (n36)		60.5% (n56)		

Note: results were correct to 1 decimal point so they do not always add up to exactly 100%.

The statistics lean slightly to the positive side of the table but, in my view, this is more indicative of the varied experience of providers than a commendation, because epithets such as “blatantly rude” “ineptitude”, “embarrassed”, “not capable”, and “they don't see small training providers as customers, but consider them a nuisance” epitomise the comments on this question. Comments by members of the focus group included the following: “do employees of the SETAS even know such a code exists”, “you have to be joking” and “that

took me about 10 minutes of rolling around on the floor with hilarity before I could even consider answers to these questions” – extreme comments perhaps but indicative of people’s real feelings. The focus group generally agreed that poor service was the key issue in people’s frustrations with the ETQA system. Figure 5.10 below categorises the nature of the perceived problems.

Figure 5.10: Providers’ perceived problems with ETQAs



Comments ranged from abusive attitudes to complete lack of communication or responses to emails, staff being unavailable because there is always some course or conference that they are attending, and telephones being unanswered. Long turnaround times emerged as the major issue by 76.2% of the provider sample, with poor leadership and management highlighted by some 57.1%.

Several people (focus group and private providers) pointed to the filling of top management posts with political appointees as a serious problem. Such appointees often came into their posts with very little understanding of their role and function as managers, with the result that the SETAs, particularly, were inefficient, rendered poor service, and wasted resources. Also

highlighted in the comments, were inadequate systems, inconsistent application of the requirements, onerous requirements, repeated submissions, and inappropriate staffing. Surprisingly, since corruption was highlighted as a major problem within the SETA system in the literature review (Sections 2.8.1; 2.16.2; and 3.11), it was mentioned only by 17.2% of the survey respondents, with no mention at all made by the CEO of the professional body, the ETQA manager, or the focus group members.

SETAs that were severely criticised were TETA, SERVICESETA (“the most useless government organisation in the country” according to one provider), and HWSETA, while some SETAs were complimented on their processes and procedures, particularly FASSET, MERSETA, ETDPSSETA, MICTSETA, AGRISSETA and LGSETA which were regarded as professional, responsive and helpful. Some of the private providers indicated that they did not have a problem with the SETAs themselves, but rather with the government departments, namely, the DHET and Umalusi.

One member of the Skills Universe (although not a member of the focus group, he gave me permission to quote him) had this to say in a strongly worded critique of the SETAs:

In their truly bureaucratic fashion they have large blocks of offices throughout every large city in this country. Managing Directors and Board members, secretaries, computers, cars, boardrooms with oak tables and chairs, closed circuit television, the list could go on for hours. What happened and why did it happen? There was no one at the top. Each SETA was its own disciplinarian. And with no one at the top there was more concern about one’s job and budget than about serving the poor who were and still are unemployed and with no hope (Connolly, 2013: n.p.).

This substantiates the inconsistency in applying standards within the SETA system. The point was made by the professional body CEO that “it is all very well having brilliant legislation and regulations”, but it is rather pointless if the application and implementation thereof is problematic. Essentially, this means that these problems really come down to a staffing issue. It has been pointed out in several instances that staff are either unqualified or inept, following bureaucratic rules and regulations and the letter of the law rather than exercising discretion and applying good judgement. The variable documentation and the duplication of requirements highlighted in the section below, simply serve to exacerbate the inconsistency.

5.6.2 Duplication of Requirements

All participants emphasised duplication as one of the major problems with the current system of accreditation and quality assurance. The duplication of requirements leads to the commitment of large amounts of time, effort and resources in compilation of portfolios of evidence and compliance with the requirements of several regulatory bodies, thereby taking the focus off teaching and learning. This is particularly problematic for the small and survivalist providers. The survey asked whether accreditation and quality assurance had helped the provider to increase their pass or throughput rates. The answers by respondents were generally negative, implying that there were other reasons for this – these were not explored.

The developmental support envisaged by SAQA (2004: 7; Chapter 1, Section 1.5) in setting up the accreditation systems as mentioned in Chapter 1 has not been forthcoming, and a one-size-fits-all approach has been adopted. While some providers support this, the results on this specific question, namely “there should be different requirements for small providers” show that there is agreement with this statement by 58.2% of the survey respondents (Table 5.5). This supports the contention that “The cost of gaining accreditation may prove to be unaffordable for the majority of these providers” (SAQA, 2004: 7).

The use of different templates by the various accreditation/quality assurance bodies further exacerbated duplication of requirements (Umalusi, HEQC or the SETAs, Chapter 2, Section 2.8). In addition, there was inconsistent interpretation of the requirements by staff even within the same quality assurance body. This was sometimes accompanied by a dictatorial attitude by staff, many of whom are less experienced in the processes and procedures than the tuition providers they are quality assuring. High staff turnover seems to be prevalent within these bodies. This is borne out by the fact that few providers consistently knew who they were dealing with. Each time they needed information or had a query, they interfaced with someone different who then applied his or her own interpretation of policies or evaluation criteria. This meant starting from scratch because there were no proper handover mechanisms in place to ensure a smooth transition from one staff member to the next. Repeated submissions added to lengthy turnaround times. Provider comments included “the first submission they sent the docs back without evaluating them, and the second time they misplaced the docs”, “the process takes forever”, and “we have been struggling for two years now to offer some courses” leading to a situation where “compliance [is] unnecessarily time-consuming and more tedious than it ought to be / could be”. One provider stated that accreditation is a “horrendous process to follow” and that there is a “total lack of skill and accountability”.

Further problems were pointed out by members of the focus group who commented that information on the SETA websites was often out of date, that junior staff were tasked with providing information without really understanding much of what they were talking about, and were bound by red-tape. As a result, they were not able to solve problems as they could not answer queries that were outside of their stock frame of reference. One of the focus group members stated that the ETQA staff members “are ill-equipped (with their SA grade 12 against people with MBAs – not our local or garden variety but from Harvard, etc.)” There is an underlying sense of anger within the focus group about being dictated to by people with far less experience or expertise, both in terms of educational qualifications or running a business. On the other hand, the frustration is often with the system rather than the person for whom several members of the focus group had some sympathy. A comment by one of the CEOs concisely summed up this opinion: “There are so many hoops one has to jump through, too many registrations, recognitions, affiliations, etc. It has reached a point where organisations must consider whether they will possibly have a better quality system within their own control, than one that is accredited”.

Not only was there a duplication of requirements but an idealistic model had been devised which assumes that “you are perfect from day 1” (CEO interview). One focus group member stated that “the Umalusi template does not make provision for emerging providers and one has to allocate a negative mark for a criterion that is outside the control of the provider” leading to a situation where small providers are not able to become accredited because they fail to meet all the criteria. All samples in the study mentioned the frustrating “one-size-fits-all” approach, because it is almost impossible for small and survivalist organisations to be fully compliant “from day 1”. They therefore largely ignore the developmental approach recommended by SAQA (2004: 7) in the actual implementation of the quality assurance processes. This has also led to a situation where providers have become “compliance orientated” (CEO) or, as one of the focus group members put it, “if you can't tick the box you are out”. Another focus group member stated thus: “In the past I frequently argued against the application of these arbitrary rules and the 'tick the box' way of doing things. After so many 'don't you dare tell me how to do my job' replies, I decided it was easier and more profitable to learn these new rules and abide by them – at least that brings some bread to the table”. This latter statement confirms what was pointed out in Chapter 2, section 2.10.5.

Constant changes in the regulatory system exacerbate the situation. This has led to a hiatus in the system causing out-of-date qualifications on the National Qualifications Framework (NQF). The ETQA Manager emphasised that since the establishment of the three quality councils in terms of the NQF Act, 2008, no new qualifications had been registered, and this

was “detrimental to learners” who are now “using outdated qualifications that should and could have been changed, but just weren’t, learning things that are no longer relevant to the workplace” (Chapter 3, Section 3.7). The ETQA manager went on to say that “instead of looking at what works, the regulatory authorities would rather reinvent and change the whole system so we are losing what is good”. At the same time, when these changes take place, there is often an exodus of knowledgeable staff and a consequent “lack of knowledge retention”, which essentially means that any new appointee has to start from scratch.

The establishment of the QCTO drew harsh criticism from the CEO of the professional body and the ETQA manager. The CEO called it an “unrealistic model” while the ETQA manager said that they are “hellbent on implementation of their specific strategy and have not considered whether that strategy is going to work for the majority of their stakeholders”. The fact that this quality council has been established without the necessary funding from the fiscus, coupled with inappropriate staffing has meant that the “way the changes have come about has not been very good” (ETQA manager). Thus, “the model that has been introduced does not take into account the realities of the situation” (CEO), has been implemented without effective structures in place and has left accreditation and quality assurance in a nebulous space where “it seems that nothing exists” (CEO). The goalposts have shifted since December 2012, with the Minister calling for a reevaluation of the QCTO mandate to quality assure qualifications above level 6 on the NQF (DHET, 2012e: 8). This has added further to the confusion, delaying the redesign of qualifications in terms of the QCTO model. According to one of the Quality Development Facilitators, “the ministerial edict of 14 December is hardly helpful. Nor can we get any direction from QCTO staff” (Van Zyl, 2013, email communication). As the ETQA manager said, “the more things change, the more things stay the same”, a saying meaning that “turbulent changes do not affect reality on a deeper level other than to cement the status quo” (WikiDictionary.org, 2013: n.p.).

The majority of private providers (76.9% as per Table 5.3) agreed with the statements that a private provider should need to be quality assured by only one quality assurance body, and 67% (Table 5.2) agreed that single accreditation should be sufficient unless there are complaints about the organisation. This would help to eliminate the duplication of requirements, the complaints about varied and inconsistent interpretation as indicated by 72.5% of the survey respondents (Table 5.3) and the “financial burden” (private provider) imposed particularly on small and survivalist providers.

Several comments were made in the open question on quality assurance, ranging from “it costs us a fortune in time and money”, “costs us many thousands every year” (one provider stated R1 million for the 2011/2012 year), and “my journey to accreditation was costly and

traumatic” to “costs should be reasonable” and “The Skills Levy should suffice for all [...] accreditation costs”. Some providers and focus group members stated that a focus on the costs was a side issue but that “the envisaged cost structures of the QCTO” would probably prove to have a “negative impact” on the smaller provider.

In Chapter 3 (Section 3.6), the point was made that an education system must be both affordable and sustainable and that the cost/benefits of “bureaucracy, paperwork, time and additional costs of external and/or internal QA” (Latchem, 2011: 9) need to be assessed. Additional “huge” costs are incurred by having to use accredited assessors and moderators whose services often have to be outsourced. This adds to the cost of provision to learners. Thirty-five of the survey respondents indicated that learners were “self-funded”, often related to being poor or unemployed, although not in every case. The inevitable result of higher costs would mean that such learners may not be able to access education and training, would further exacerbate intimations of inequity (Chapter 3, Section 3.8), and would be counterproductive in the South African economy which is struggling to find sufficient skilled workers (Chapter 1, Section 1.2).

A possible alternative to a government-driven system is the ISO 9000 model, with 59.8% of the providers supporting the statement “as a private provider, we should be allowed to choose our own quality assurance model” (Table 5.5). There was some support for using this model although the majority of providers have only used the regulatory model.

5.6.3 Perceived Problems with Tuition Providers

The interviews with the Professional Body CEO and ETQA manager were scrutinised to seek some balance in the findings in the previous section, and to determine whether tuition providers may be contributing in some way to these problems.

The ETQA manager stated that there were sporadic related problems with tuition providers, mainly in respect of unrealistic expectations. They anticipated simple acceptance without question of everything they presented in terms of accreditation and quality assurance. There was also sometimes an instinctive sense that “something is not quite right”, and a “feeling in reality that assessments are not really done that way” – this was described as “it’s a bit like a cake – good on top but put your finger in, it’s really bad”. The ETQA manager stressed that these problems were minimal and such providers either did not come back to complete the processes and so fell out of the system, or, where the provider was genuine in seeking accreditation, they would remedy the matter and the issue would be resolved. Even when the ETQA, despite its misgivings, did accredit a wayward provider, ongoing monitoring soon sorted the problems out. Learner complaints were sometimes the catalyst for checking up on

a provider, but the ETQA had “never had a level of complaints where we have actually had to deaccredit a provider”. Problems of learner exploitation were far more likely to occur with those providers who could not meet the accreditation standards but nevertheless remained in operation, as has been seen with “any number of providers in the last couple of months who have been reported in the news” (ETQA Manager). This leads to a situation where the whole private provider industry becomes tainted and looked upon with suspicion. One provider stated that “The recent Carte Blanche shows, for example, have impacted negatively on ALL of us in the sector, regardless of our own compliance statuses, as the regulators then seek to root out the problematic providers and students assume everything that goes wrong is a key ‘Carte Blanche’ issue!”

Providers sometimes fell into the trap of red tape where compliance became a matter of ticking all the boxes, in the belief that “it’s easy to be accredited and that it’s a quick job where it’s in and out and then it’s money in the bank and off you go” (ETQA Manager). This then becomes a case of providers “putting things together purely to get accredited” and never implementing policies or systems, or not implementing them “in the spirit in which it was intended” (ETQA Manager).

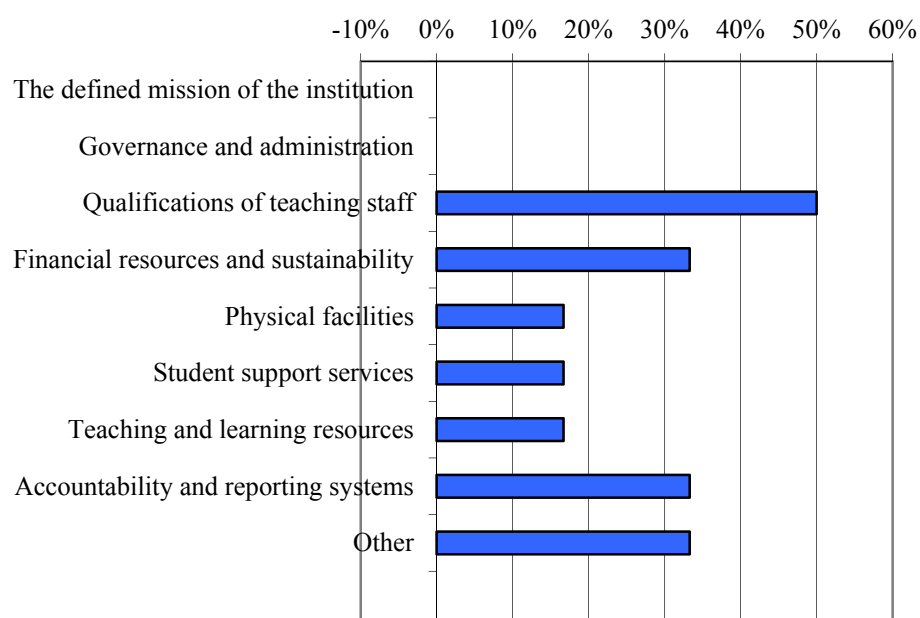
The professional body CEO also pointed out that tuition providers had unrealistic expectations and were compliance-orientated. This was attributed in part to the constant changes that take place in terms of legislation or other regulatory imperatives. Another problem was that if a provider was deaccredited, they simply continued to operate as though nothing had happened. This led to a lawsuit, where the provider did not meet the standards, but was intimating to the public that he in fact did. The professional body consequently had to protect its integrity by taking legal action. This is extremely rare, however, and in most cases where a developmental approach is adopted by the professional body, providers have proven themselves capable of improvement and worthy of continued accreditation.

5.6.4 Areas of Concern with Private Providers

Figure 5.11 below indicates the main areas of concern, of which the most important is the qualifications of the teaching staff (Chapter 2, Section 2.15.1). CEOs of professional bodies indicated that it was problematic getting the correct qualified personnel to teach at the NQF level as required by the SETAs. That is, an individual requires a qualification one level higher than the one he is teaching (confirmation of Chapter 2, Section 2.15.2) although part of the problem is non-registration of assessors and moderators by the SETAs which then made them ineligible to carry out the prescribed functions.

One CEO commented that their providers are predominantly small businesses with limited resources. “They [the providers] view the grant and tax benefits of a learnership as a means to support the learner, not realising that the cost of hosting a learnership far outweighs the money coming back to them. Regarding accountability, it is often viewed that the QAP (because we happen to be a Professional Body) is fully responsible for the learner at the practice. Our workplace providers therefore often play the ‘blame game’ when it comes to taking accountability for us picking up poor quality at their practice”. If the majority of providers are small, and therefore under-resourced, it stands to reason that financial resources and practical training facilities are limited.

Figure 5.11: Areas of concern observed by CEOs of professional bodies

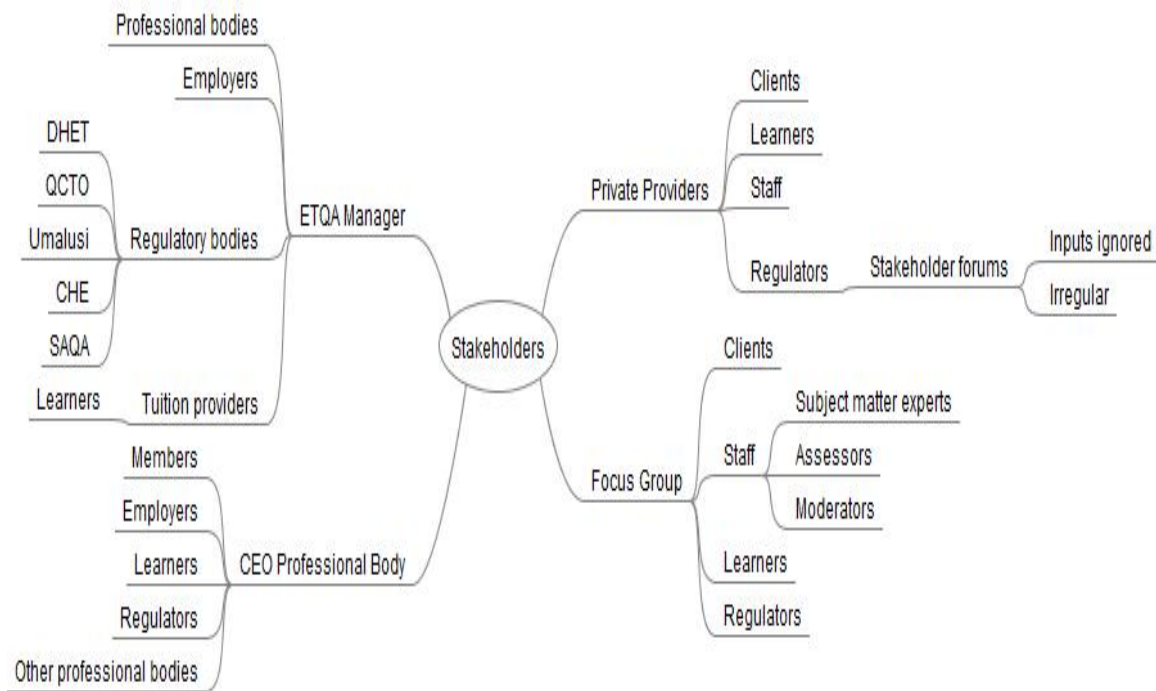


5.6.5 Other Key Problems

A highlighted cause of problems and challenges is a lack of consultation with stakeholders. Chapter 2, Section 2.7 deals with this concept extensively.

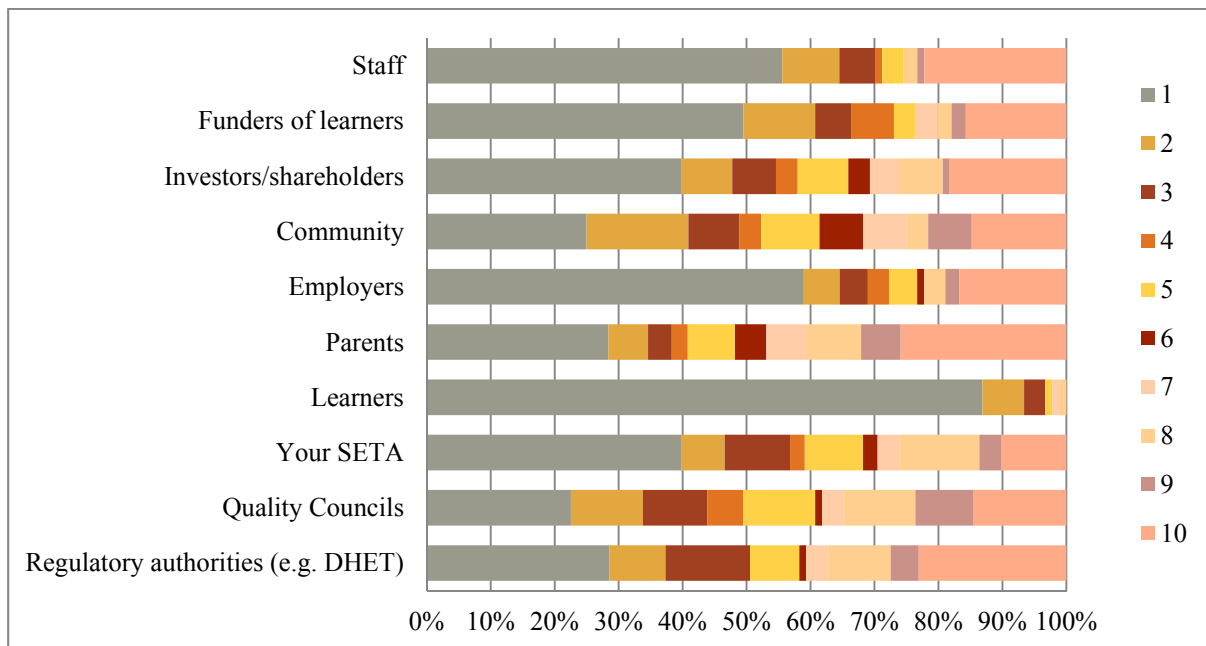
The mind-map (Figure 5.12) illustrates the similarities and differences between the stakeholder groups of various participants and serves to confirm the information found in the literature review. Of specific note is the fact that the regulators are only one of several stakeholders mentioned by all participants.

Figure 5.12: Stakeholder groupings



The following figure (5.13) reflects the relative importance of the stakeholders in terms of the private providers, with learners, staff and employers ranking the highest.

Figure 5.13: Provider stakeholder rankings
(1 being most important, 10 being least important)



It is clear from the graph that learners feature the most highly on the provider stakeholder rankings followed by employers and staff, and that quality councils take last place.

Table 5.8 below indicates the extent to which providers have been involved in stakeholder consultation.

Table 5.8: Stakeholder consultation

	Yes	No
There is sufficient stakeholder consultation by the ETQAs regarding quality assurance.	34.4%	65.6%
Are you able to submit comments to your ETQA e.g. via a website link/ in writing, etc?	59.6%	40.4%
If you answered yes to the previous question, have any of your comments been acknowledged?	47.8%	52.2%
Have any of your comments or suggestions been incorporated into your ETQA policies and practices?	22.8%	77.2%
Have you ever been invited to participate in a stakeholder forum organised by any ETQA?	59.6%	40.4%
Have you ever participated in such a forum?	58.6%	41.4%
Have any issues raised by you at such a forum been incorporated into policies and practices?	25.3%	74.7%

These statistics illustrate that stakeholder consultation is a somewhat vexed issue. While participation in stakeholder consultations by the providers is above 50%, there seems to be little endeavour on behalf of the ETQAs to really involve the providers in the decision-making or policy-making process, since comments or suggestions either via online mechanisms or at face-to-face meetings are largely ignored and seldom incorporated into any revisions that might take place, confirming the opinion stated in Chapter 2, section 2.6.1.1. This leaves providers feeling frustrated as indicated by the following statements:

- “Stakeholder forums are used to rubber stamp decisions already made”;
- “We do not receive feedback after forum meetings”;
- “You are being invited (sic) (and we always attend) but these sessions normally are there to give providers information of already made decisions. If you complain or try to add, the message is always ‘This is not the forum’”;
- “Stakeholder forums do not result in any improvements. They are opportunities for providers to vent their frustrations”;
- “As far as the invitations to the forums, these are only held in our town maybe every 3 years. It is more about the food and it should be for a day but by lunch time the meeting is over and everyone may leave before or just after lunch is served. A day wasted for us!”; and

- “I do not know so much what is happening in ETQA because the level of communication with clients is very limited”.

These findings support the statements made in Chapter 2, Section 2.6 with regard to stakeholder consultation.

On the other hand, there were some positive comments about individual SETAs such as INSETA and AgriSETA being very proactive in engaging with their providers. The ETQA manager said that lack of support had stopped some stakeholder fora. In Chapter 2, Section 2.6.1.1, it was pointed out that there are several barriers in getting stakeholders (especially PHEIs) to participate in discussions with the regulatory authorities or each other for a number of reasons, including intense competitiveness in the market (Fielden & Varghese, 2009: 82). In a sense, therefore, providers as stakeholders are partly to blame for the lack of stakeholder consultation.

The QCTO came in for criticism as a stakeholder of the professional bodies and the ETQA manager because of its intransigence in insisting on the implementation of its model of accreditation and quality assurance, in spite of the many misgivings of its stakeholders. They were accused of “not being organised, and not listening to their own stakeholders nor evaluating what is being said to them” (ETQA manager); in addition they “have not considered whether that strategy is going to work for the majority of their stakeholders” (CEO). The reaction of the QCTO has led to a situation where it is not regarded as an important stakeholder of the ETQA.

The interviewed professional body CEO also criticised the QCTO model as unrealistic, that does not take into account the reality of the industry or worked to improve on the existing paradigms, having in essence “tried to start from scratch around some idealistic model”. The QCTO has been mandated to redesign all trade and occupational qualifications, which includes professional qualifications, but this is becoming unethical because the professional qualifications already exist as designed by communities of expert practitioners, often with international recognition. Therefore, to redesign a qualification that is already serving its purpose, is well regarded in commerce and industry, and opens doors to employment for its members, is a waste of resources. For the professional body, it was far more important to consider the needs of its members and students who are its key stakeholders, with the regulatory bodies considered as stakeholders merely because they give you “your licence to play”.

Several providers mentioned unethical activities by competitors. Examples include instances where the SETA appoints competitor providers to assure the quality of other providers. One provider commented as follows: “We do not like private providers coming to do a visit and insisting on seeing our financial statements, our strategies and company-specific, sensitive information. Next month they are our opposition and use our strategies”. Another stated that “the moderation process is outsourced to our competitors who have no interest in us continuing offering our programmes”. Yet another commented on the potential theft of intellectual property with an “assurer wanting to physically take your programme material off site for a week to ‘go through it’ and conveniently who also delivers the same type of training (sic).” These providers applied for accreditation (indicating their willingness to comply with the regulations) but the ETQA did not have the capacity to carry out the evaluation itself and outsourced this to other providers. They become understandably reluctant when the ETQA appoints another provider to do this. The applicant would not have a problem with an ETQA staff member carrying out the evaluation because there is no element of competition or need to protect the provider’s intellectual property, but they become cagey and wary when another provider is appointed to do this.

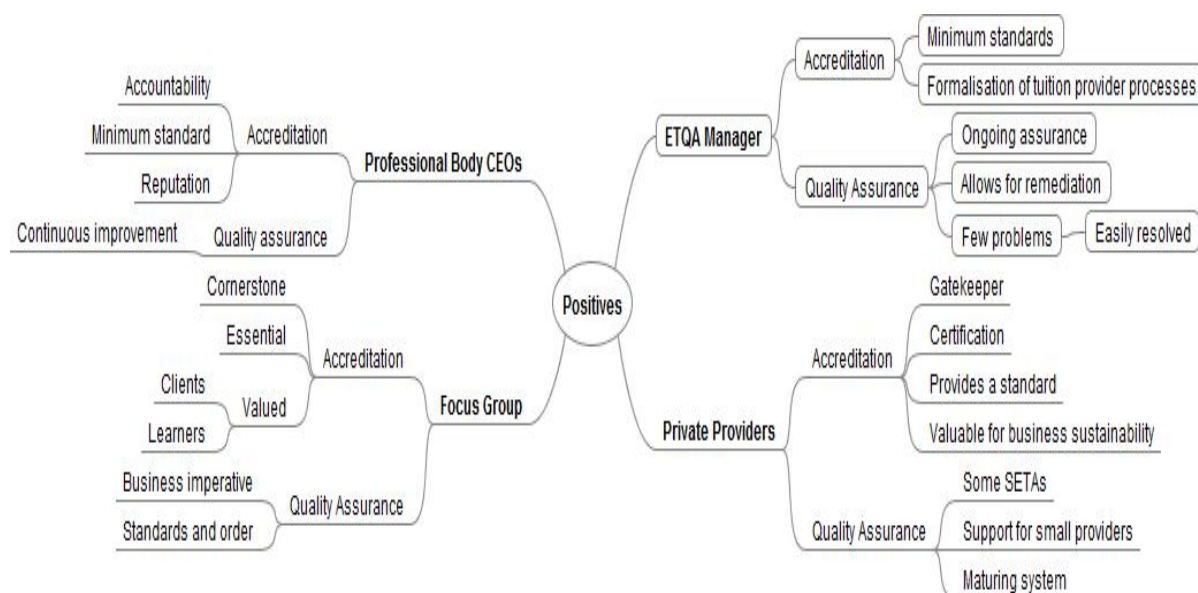
A problem mentioned by both the Professional Body CEO and the ETQA Manager was the ignorance of learners regarding career choices and frustration with learners who “subscribe to a blame culture, and have no internal locus of control and when they don’t like what happens to them they then complain” (ETQA manager). The interviewed CEO stated that “students do not understand in general the differences between accreditation and registration” and that there needs to be a much broader communication campaign about the accreditation model. This supports Letseka (2009: 91; Chapter 3, Section 3.12.3) who attributed the high dropout rate to a “lack of career guidance and misalignment of student choices and ability”, among other factors.

5.7 POSITIVE ASPECTS

Up to this point, a litany of negative perceptions of current quality assurance challenges has dominated the findings. Nevertheless, there are some positive elements. The positive findings focussed on the two key aspects of the research, namely accreditation and quality assurance, with the viewpoints of each group of participants reflected in the following discussion.

The mind-map (Figure 5.14) shows the coding of positive findings in the research.

Figure 5.14: Positive findings



5.7.1 Focus Group

The focus group generally agreed that accreditation was the cornerstone of a viable private provider industry, although some of the group said that the kind of training demanded by employers did not always require accreditation but definitely included the offering of a quality programme, professionally conducted by expert practitioners. The consensus was that all forms of training should be included in the quality assurance system, as this is an effective way of keeping out “fly-by-night” operators, and contributes to the maintenance of standards and order within a highly complex industry. In the final analysis, the focus group members insisted that any system of quality assurance must focus on the end product, namely equipping the learner. Quality assurance done for any other reason is a pointless exercise.

5.7.2 ETQA Manager

The ETQA manager fully supported accreditation in principle, as it provides for a minimum standard against which a provider can be evaluated. A positive aspect is that tuition providers applying for accreditation had to formalise their policies and procedures. Previously, they had often been in operation but policies and procedures were never verbalised on paper. That in itself made tuition providers re-examine their business practices and brought the realisation that there were things that could be improved. This “has strengthened their own approach leading to them giving learners a better level of tuition” which is, after all, the objective of having a quality assurance system in place. Ongoing monitoring and quality assurance allows for immediate remediation if there are any problems. The ETQA Manager felt that

having solid accreditation structures in place and building good relationships with its stakeholders is key to the success of quality assurance.

5.7.3 Private Providers

The positive factor most highlighted by the private providers was that the system is maturing. Several providers commented on cordial relations with their ETQAs and said that “Some individuals are striving to do their best in very difficult circumstances”, and complimented some SETAs on their handling of queries, responsiveness and helpfulness.

Clients and learners regard both accreditation and quality assurance as fundamental to the provider’s recognition. Accreditation is foundational to quality assurance as one could not have one without the other, and provides a standard against which all providers can be measured. To some extent, this levels the playing fields and keeps unscrupulous providers at bay. Accreditation is good for competitiveness, which brings with it its own drive to be the best at what one does. Accreditation is also a marketing tool because providers believe that their clients and learners value it.

5.7.4 Professional Body CEOs

There is consensus that accreditation provides a minimum standard, and holds providers accountable for what they do. This is an essential aspect of the good reputation of these providers who provide tuition for the professional body programmes, since professional bodies are debarred from providing tuition of their own qualifications. Accreditation provides the professional bodies with some measure of assurance that the tuition provider is up to standard, and ongoing quality assurance provides for continuous improvement.

5.8 CONCLUSION

This chapter has examined the results from the empirical research with a particular focus on addressing each of the research objectives stated in Chapter 1. The analysis used the *a priori* coding framework devised in Chapter 4, with an intuitive, inductive approach that focused on the qualitative aspects of the research, namely semi-structured interviews, the focus group discussion and open questions on the surveys. A series of mind-maps encapsulated the coding, highlighting similarities and differences between various sample groups on key points of the research. Tables and figures used quantitative statistics as supporting information for qualitative analysis.

Chapter 6 provides the conclusions to the research and makes recommendations for the future based upon the suggested solutions of the participants.

CHAPTER 6

CONCLUSIONS AND RECOMMENDATIONS

6.1 INTRODUCTION

This thesis set out to examine the quality assurance system in post-school education in South Africa by seeking answers to the research question: “what are the quality assurance challenges that post-school private education and training providers experience?” The research then focused specifically on understanding the experience of these private providers, and seeking a possible new paradigm for consideration by the authorities.

6.2 CONCLUSIONS

In Chapter 1, six objectives were set out as the focus of this research. Each of these objectives is addressed in drawing conclusions below.

6.2.1 The Raison D’être of the Private Provider

Chapters 2 and 3 made it clear that there is a role for private providers at every level of the NQF, and in every education band. The government cannot bear the entire cost of education, nor does it have the capacity to meet the full demand for education. Private providers have, over the 17 years since the establishment of SAQA in 1996, offered tuition and training in a wide range of programmes beyond the reach of public institutions. More specifically, they offer skills programmes and short courses that effectively meet the needs of employers wanting to upskill their workforces. Private providers cater for approximately 10% of the educational provision in South Africa. In addition, private providers have the ability to be more flexible in their offerings because of their business orientation and a greater focus on their stakeholders’ requirements.

6.2.2 Quality Assurance as a Critical Focus in Education

The in-depth literature review concludes that quality assurance is a vexatious issue, with demand hobbled by little agreement on how it should be done.

At the time of the democratisation of the political arena in 1994, the education system was one of the first sectors that needed to be addressed to create an equitable playing field for all learners (Chapter 2). There was a pressing need to address the exploitation of learners under the apartheid regime. At the same time, the quality assurance movement in education started

to gather momentum across the globe, and South Africa was a pioneer in establishing a National Qualifications Framework. Private providers that had previously existed without any regulatory control now came under the spotlight, and were expected to meet the accreditation and quality assurance standards established under the auspices of SAQA. Private providers readily embraced these arrangements almost unanimously. They agreed that both accreditation and ongoing quality assurance are essential (Chapter 5, Tables 5.4 and 5.5). One of the problems highlighted by the focus group particularly, was the continued existence of “fly-by-night” operations, an issue that was also raised in Chapter 1. Therefore, it seems that while the mainstream private providers have welcomed accreditation and the concomitant quality assurance, there is still exploitation of learners taking place by unaccredited organisations. This again supports the need for a focus on quality assurance.

Quality assurance, however, is not an easy issue to deal with, mainly because of differences in understanding what quality assurance means. The definitions provided in Chapter 2 bring some clarity to this debate. In addition, an outline and discussion of various aspects of accreditation and quality assurance requirements on a micro-level attempted to unravel their complexity, and investigate the demands placed on private providers in this regard. It was shown that a “one-size-fits-all” approach is onerous, especially to small and survivalist providers which make up the majority in the industry (DTI, 2008: xxxiv; Figure 5.2). An important aspect of the debate in Chapter 2, Section 2.7, focuses on stakeholder theory, as this goes some way to clarifying the differences of opinion that exist between the regulatory bodies and private providers, as illustrated in Figure 5.8.

Chapter 3 examined the trends in private education taking place on a global scale, and discussed key constructs such as human capital theory and the macro-environment of education. It was shown that the need for quality assurance has been impacted by the massification, globalisation and marketisation of education. Chapter 3 observed that there are several regional quality assurance groups across the world, including Southern Africa, which attempt to bring some kind of standardisation to the quality of education offered within their specific regions. It is an effort to evaluate the educational qualifications of people seeking work and opportunities across borders, regrettably with no absolute conclusions.

6.2.3 Quality Assurance Mechanisms

Chapter 2 dealt extensively with the micro-environment of education in South Africa, highlighting in particular the policies and requirements of the regulatory authorities. A

system of devolved quality assurance gave the SETAs the responsibility of quality assuring providers within their sectors. At the same time, however, a parallel system of registration required providers to register with the Department of Education (now the DHET), with Umalusi, or with the Council on Higher Education. This led to a proliferation of red tape with regulatory requirements becoming burdensome and onerous, as well as contributing to a waste of time, money and human resources at all levels, both within the regulatory bodies and within the private providers themselves. Many providers then chose either not to become accredited or not to renew their accreditation, thus falling into a nebulous space where they now offer unaccredited training. This is not necessarily illegal, but tends to be lowly regarded by learners because of the lack of credit value such courses have. At the same time, many of these providers have found a niche market in offering short courses that are tailored to the specific needs of their employer clients, and it appears that employers are not specifically concerned about the accreditation thereof, preferring to upskill their employees on effective, tailor-made short courses that do not require extensive time away from work. In such cases, providers that have built a good reputation are thriving in that market.

These regulatory requirements were the subject of the greatest amount of negative opinion in the empirical research (Chapter 5, Section 5.5). The main conclusions are that the regulatory regime is indeed onerous, fraught with bureaucratic red tape, a tick-box approach to accreditation and quality assurance from both ETQAs and providers themselves, and a general sense of frustration that little seems to have been achieved in terms of improvement in teaching and learning, despite the best intentions of policy makers.

6.2.4 Problems with Quality Assurance Policies, Practices and Processes

Chapter 2 dealt extensively with these problems and this was borne out in the empirical research in Chapter 5. Most of the criticism was aimed at the SETA system, as opposed to the Department of Higher Education and Training or the Council on Higher Education. The main cause of problems with the SETAs was contingent upon regulations and policies put in place by the regulatory authorities who are ostensibly responsible for the SETAs.

Criticisms focused on inadequate management, inappropriate staffing, poor and arrogant attitudes of the majority of SETA staff (with a few notable exceptions), and the lack of appropriate qualifications of staff tasked with accreditation and quality assurance. This suggested that a system of red tape, bureaucracy, nepotism and a “tick-box” approach to quality assurance has become the norm. Certainly, quality assurance does not seem to be an

integral part of a SETA's self-evaluation, with some SETAs placed under administration because of high levels of mismanagement and wastage of funds. Even that does not seem to have solved the problems with those SETAs heavily criticised by private providers in their survey responses.

There were some problems with tuition providers as well, but the weight of evidence points to the implementation of the accreditation and quality assurance policies by the ETQAs as the major hurdle, despite the willingness of the majority of private providers to comply with the requirements.

6.2.5 Management of Quality Assurance by Private Providers

Most private providers who participated in the survey indicated that accreditation was essential to their success, and agreed that quality assurance was also imperative. This leads to the conclusion that these providers want to comply with the regulations and have therefore established their policies and procedures in line with those requirements. Very few providers use any other form or system of quality assurance, such as ISO 9001, preferring rather to abide by the regulatory authorities' processes.

A problem arises when this amounts to form rather than substance, where they too may have simply adopted a tick-box approach just for accreditation, without the necessary follow-through to ongoing quality assurance processes. This can be partly attributed to the sheer volume of paperwork, the duplication of requirements from different ETQAs, and the costliness of the exercise especially for small and survivalist providers, who often need to hire consultants, as they do not have adequate human resources.

Stakeholder consultation was limited, more geared towards information sessions than meaningful dialogue.

6.2.6 Alternative Paradigms

Most participants in the study expressed qualified support for the current system. They believe that the system should be adapted and streamlined, rather than replaced. The SETA system, however, was heavily criticised by the private providers and the Skills Forum focus group, indicating that this was where the greatest need for change exists. Very few respondents actually provided any meaningful contributions in answering this question, except for two focus group participants and the ETQA manager who mooted a centralised

system of control vested in SAQA, with devolution of implementation, although it was not indicated how this might be established. Certainly, there was no support for the continuation of the SETA system.

There is a regrettable dearth of positive conclusions arising out of the research. The only emphatically positive conclusion is that accreditation and quality assurance are essential.

6.3 VALIDITY, RELIABILITY AND GENERALISABILITY

The theoretical framework was built by integrating different models (an adapted version of Zaki, 2008: 468) and concepts (definitions of quality assurance and stakeholder theory in Chapter 2 and human capital theory in Chapter 3) in order to contribute to educational theory, using the inductive approach whereby theory is generated from the findings based on the data collected. The main purpose was to contribute towards the theory on what quality assurance means within the education industry. To the extent that this thesis relies on the lived experience of the participants, judgments are made about what works and what does not work. By generalising those judgments, this dissertation has contributed to the creation of educational theory (Meyer & Bushney, 2008: 1230, Chapter 2, Section 2.6.1), which feeds back into influencing the way we act and behave in future.

Internal validity relates to the extent to which research findings match reality, and answers the question of whether the research had the right focus. The focal point of this thesis is the quality assurance challenges experienced by private providers in South Africa. The literature review in Chapters 2 and 3 examined this in depth from the perspective of other researchers, while the empirical research aimed at finding the voices of private providers themselves. Cross-referencing and multiple sources served to increase internal validity (Wickberg & Zaksaitė, 2002: 25). It was possible to put the same questions to people with different perceptions (as in the four populations selected, although only three participated), and this too enhanced the internal validity of the findings. The study makes no claim for external validity.

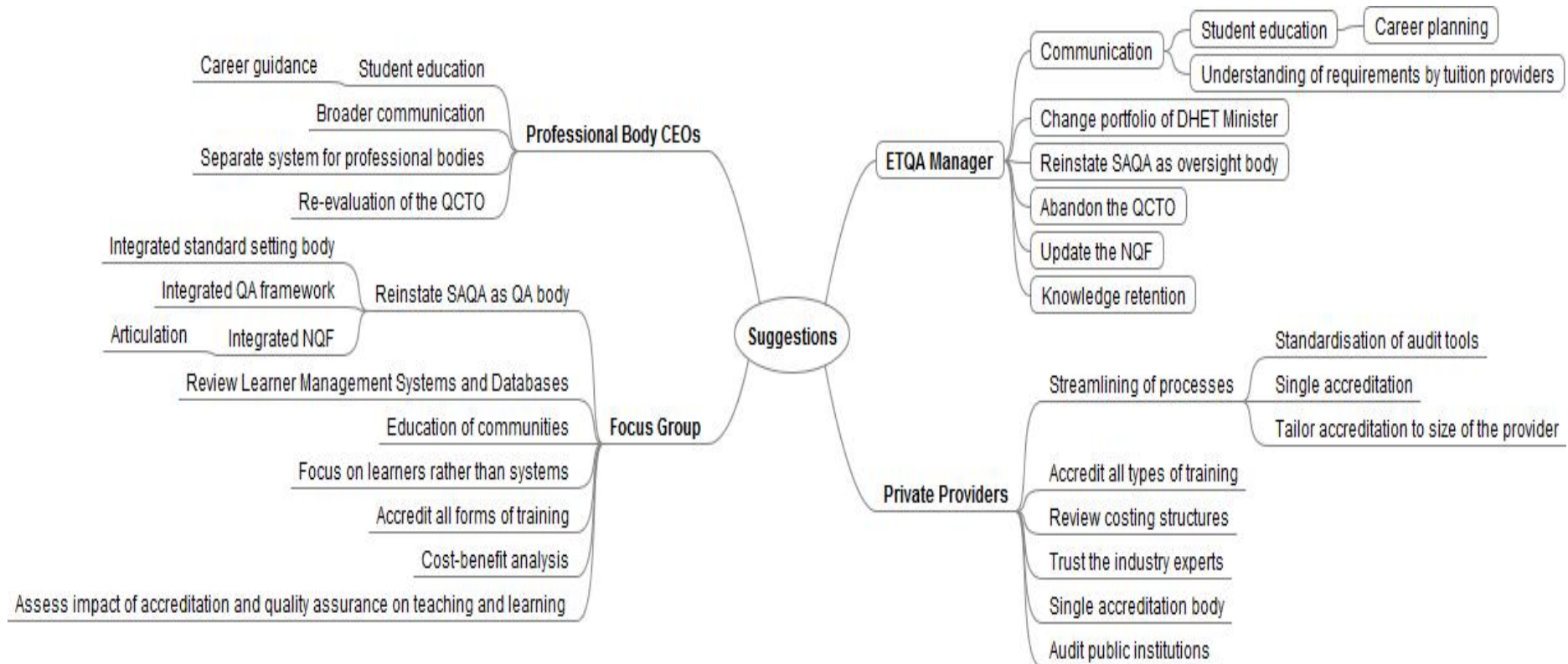
In terms of Yin (2003: 31), the heterogeneous composition of the sample populations also supports the conclusion that the study has analytical generalisability, which assumes that the results contribute to a general theory of the phenomenon despite the fact that the findings claim no statistical generalisability.

The comparison of the different viewpoints assisted with the triangulation of the findings, which allows for a conclusion that the study is reliable. This is particularly important in considering the low response rate on the surveys; the results and coded analysis, however, show a strong correlation between the individual providers as well as all the other groups of participants. Even if the response rates had been higher, I do not believe the conclusions would have been any different.

6.4 RECOMMENDATIONS

I felt that the participants in the study should have a voice in making the following recommendations. To this end, the mind-map that follows (Figure 6.1) contains their suggestions, expanded in the subsequent discussion.

Figure 6.1 Survey participants' recommendations



6.4.1 A Common Definition of Quality Assurance

There is an urgent need for a common definition of quality assurance together with a standard procedure for how it should operate. Until and unless this happens, it is likely that a system flawed by inconsistent interpretation and application will simply continue into the future.

Quality assurance is not a nice-to-have, add-on function that occurs at the end of a process; it should rather permeate the whole process. In chapter 1, we saw that learners are at the bottom of the quality assurance spiral, and normally pay the price for poor quality assurance. If training providers and employers do not support and implement quality assurance, the likelihood increases that learners will not have a positive training experience and will be less employable after training, because the certificates that they have been issued with do not stand up to scrutiny.

The majority of respondents in all the samples agreed that quality assurance is essential but did not necessarily concur on the mechanisms required. The problems are that different quality assurance bodies use different criteria and procedures, and they have perceptions of the purpose of quality assurance other than to promote and protect the interests of learners, i.e. misuse of quality assurance as an instrument of power and politics. This kind of complexity creates a heavy burden for providers, especially in the survivalist category. They spend an inordinate amount of time and money on compliance, and become distracted from their real focus, which should be on quality teaching and learning. In any event, the majority of providers indicated that accreditation and quality assurance did not have a major influence on pass rates. The question of whether all these regulatory mechanisms have in fact led to improvements in teaching and learning is an area for further research.

6.4.2 Streamlined Organisational Processes

The processes and procedures need to be streamlined and simplified, and for many reasons, there should be an integrated standard-setting system linked to the NQF, for example: to make the quality assurance process more efficient and cost-effective; to promote portability of credits and qualifications between learning institutions; to promote lifelong learning; and to meet the general principles of the National Qualifications Framework. This is achievable only if there is an integrated National Qualifications Framework (NQF) accompanied by an integrated quality assurance framework. The ideal body to hold this responsibility would be SAQA. Experience to date suggests the abandonment (or at least re-evaluation) of the QCTO

model. Even in the early days of its establishment, it reveals inherent flaws in design and implementation.

6.4.3 Overhaul of the SETA System

An urgent review of all SETA systems and functions is called for, as most SETAs do not seem to understand the reason for their establishment in the first place. SETAs emerged primarily to address skills shortages in the South African economy. Since SETAs are where the system has faltered, largely because of a culture of ineptitude, bureaucracy and nepotism, they should not be responsible for accreditation and quality assurance. Staff within SETAs are seen to favour friends, associates, and close connections, and to advantage certain providers, which counteracts competitiveness in the industry. The focus should shift from employers and other favoured service providers to learners and eligible training providers with the best practice in place. The politicisation of SETAs came in for criticism with many providers, indicating that poor management and leadership is a serious problem. Senior management positions in the SETAs should be filled by experienced and qualified business managers.

Skills development is an urgent need in South Africa that requires close monitoring and control. Logically, this is where the SETAs should be involved since this was their initial purpose. There should be a serious drive to educate communities, both on the SETAs' role, and the benefits of skills development. They need to have a clear understanding of skills development programmes and systems, and what they are intended to do. SAQA should act as an oversight body so that skills development programmes are fit for purpose, leading to more meaningful employment for the learner.

6.4.4 Accreditation of All Forms of Training

The quality assurance framework should accommodate all levels and types of training – unit standards, whole qualifications, skills programmes and short courses. Although recent developments indicate that short courses may fall outside the ambit of the quality assurance system, this would lead to a situation where training would no longer satisfy a vital part of industrial skills needs. Most employers cannot enrol their employees for learning programmes of long duration, and they need a system where their employees can accumulate credits towards a national qualification by attending short courses. Presently, short courses do not generally have credits attached to them and a mechanism is required whereby learners

can accumulate credits, irrespective of the form of training they undergo. This is where the registered professional bodies could have some influence with their continuing professional development programmes.

6.4.5 Incentivisation of Providers

Quality in education and training should be determined using less of the check-box against a list of standardised criteria approach, and with more emphasis placed on an evaluation of the learner results. Providers that consistently deliver good results could be incentivised by lightening the quality assurance requirements; for example, the number of times they require to be audited could be extended from three years to five-year cycles. Consideration could also be given to funding of students attending such providers from the NSFAS fund, which is currently reserved for tuition at public institutions such as universities and FET colleges.

In order to determine which providers would be eligible for incentivisation, the current NLRD IT architecture would need an overhaul. It is outdated and does not reflect true statistics. All ETQAs reporting into the database should be monitored, and the uploading of learner data should be standardised. This would have the positive benefit of streamlining these processes, and creating a coherent database that is accessible, manageable and up to date. This would also allow for an early warning system for the regulatory authorities to detect problems with specific providers, particularly if the throughput rate consistently falls below a set benchmark.

6.4.6 Consideration of Alternative Quality Management Systems

Providers should show evidence of compliance with a standard, universally acceptable QMS such as ISO 9001, accompanied by regular external audits. This is common practice in businesses giving objectively verifiable evidence that their businesses are run in accordance with internationally acceptable quality benchmarks. The upshot would be consistency in the assessment of quality assurance. This recommendation notes that private providers are primarily businesses, whose product and service offering is education. The small and survivalist providers especially have highlighted costs of accreditation and quality assurance as unreasonable in terms of the current multi-level systems. Having one internationally benchmarked system in place would go a long way to resolving this problem, especially since the costs of ISO 9001 depend on the complexity of the business, as opposed to having a one-

size-fits-all approach as is currently the situation in South Africa. ISO certification is reissued in a three-year cycle, to ensure that the business is maintaining standards.

6.4.7 Stakeholder Engagement

Stakeholder involvement is crucial to the success of any accreditation or quality assurance system. This is perhaps the most contested aspect of this research as there is very little stakeholder involvement, and input from stakeholders does not seem to have any impact on the policies devised by the regulatory authorities. Industry practitioners should be involved in the evaluation of material content, delivery and assessment, and the ETQAs should have the responsibility of external moderation and learner certification. External moderation is possible by means of evaluations and surveys such as student or learner surveys, provider surveys and related critiques, which should feed into an efficient information system. This should include mechanisms to ensure that facilitators, assessors and moderators are properly qualified. The monitoring mechanism should allow evaluators to test the provider's Quality Management System empirically, to make sure it is compliant and above-board.

To sum up, there are several key requirements for a quality assurance system to work in post-school private education and training, namely:

- A mutual understanding among all role players of what quality assurance means and involves;
- Streamlined organisational structures with one national body (SAQA) acting in an oversight capacity together with the simplification and uniformity of policies and processes;
- An overhaul and realignment of the SETA system with apolitical appointments to leadership positions within the regulatory authorities and quality assurance agencies, along with a focus on strong, capable business leaders taking up those posts;
- The accreditation and quality assurance of all levels and all kinds of training;
- The incentivisation of private providers who show consistently good results and throughput rates.
- The consideration of alternative, proven, business orientated quality management systems; and

- A joint commitment to the process of accreditation and quality assurance, together with a greater degree of stakeholder engagement, by the regulatory authorities, private providers, professional bodies, and practitioners.

6.5 AREAS FOR FURTHER RESEARCH

- There is a need to research the impact of accreditation and quality assurance on improvements in teaching and learning. After all, if such improvements are not forthcoming, the system in place seems to be an exercise in futility. Concomitant research to determine best practice benchmarks in education could facilitate comparative studies;
- A comparative study of the various established regional protocols could be undertaken, especially with the intention of determining the success of these protocols in enhancing understanding of quality assurance in education;
- A comparative study of the quality assurance regimes for private providers in other African countries or other world regions could be undertaken, to determine what works and what does not work. This could be used to inform the quality assurance policies and practices in South Africa;
- A further area for research would be the application of the internationally benchmarked ISO 9000 quality assurance model, which is the common standard for businesses. This could be piloted with those providers who have already implemented the ISO 9000 model in addition to the regulatory system, and compared with providers who have applied either or both models.

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APPENDIX A: DATABASE WEBLINKS FOR SETA ACCREDITED PROVIDERS.**[ALL WEBSITES ACCESSED: 8 APRIL 2012]**

Acronym	Name	No.	Reference
FASSET	Financial and Accounting Services SETA	101	http://www.fasset.org.za/etqa/default.asp?thepage=accreditation/accredited.htm
CHIETA	Chemical Industries SETA	103	http://www.chieta.org.za/QualityAssurance/quality_index.html
SERVICES SETA	Services SETA	1267	http://www.serviceseta.org.za/ETQA/etqa_index.html
CATHSSETA	Cultural Activities, Tourism, Hospitality and Sport SETA	130	http://www.theta.org.za/etqa/default.asp?thepage=amqp/providers/providers.asp
INSETA	Insurance SETA	137	http://www.inseta.org.za/accredited_providers/default.asp?thepage=accredited_providers.asp
MERSETA	Manufacturing, Engineering and Related Services SETA	185	http://ww2.merseta.org.za/OrgIndex.asp?page=sites
ESETA	Energy SETA	189	http://www.eseta.org.za/Training_Providers.htm
W&RSETA	Wholesale and Retail SETA	230	
FP+MSETA	Fibre Processing and Manufacturing SETA	234	http://www.fieta.org.za/providers/default.asp?thepage=default.htm
CETA	Construction Education and Training Authority	238	http://www.ceta.org.za/QualityAssurance/ETQAaccreditedProviders.asp
AgriSETA	Agricultural Sector Education Training Authority	282	http://www.agriseta.co.za/etqa/default.asp?thepage=list.asp
PSETA	Public Service Sector SETA	45	http://www.pseta.gov.za/documents/ETQA/Accredited%20Training%20Providers.pdf
BANKSETA	Banking Sector Education and Training Authority	49	http://www.bankseta.org.za/etqa/default.asp?thepage=accreditation.htm
ISETT	Information Systems, Electronics and Telecommunications Technologies SETA	696	http://www.isett.org.za/incASP/frame.asp?theSection=/etqa/default.asp&thepage=amqp/menu1.asp
SAS SETA	Safety and Security SETA	860	< http://datanet.sasseta.org.za/Search/TPSearch.asp?Find=Find&cName=&cAccnum=&cRegion=&pk=&code=&programme=&submitto=self=yes >
ETDP SETA	Education Training and Development Practices SETA	956	http://datanet.etdpseta.org.za/OrgIndex.asp?page=sitesearch
MQA SETA	SETA for Mining and Minerals Sector	97	http://www.mqa.org.za/siteimgs/Accredited%20Training%20Providers%20as%20at%2008%20February%202011.pdf
		5799 (total)	
FOODBEV	Food and Beverage Manufacturing Industry SETA	No statistics available	
HWSETA	Health and Welfare SETA		
LGSETA	Local Government SETA		
MAPP	Media, Advertising, Publishing, Printing and Packaging SETA		
TETA	Transport SETA		

APPENDIX B: ETQA MANAGER INTERVIEW PROTOCOL

I want to thank you for taking the time to meet with me today.

My name is Jacqui Baumgardt and I would like to talk to you about your experiences with the accreditation and quality assurance of tuition providers.

The interview should take about an hour. I will be taping the session because I don't want to miss any of your comments.

Although I will be taking some notes during the session, I can't possibly write fast enough to get it all down. Because we're on tape, please be sure to speak up so that I don't miss your comments. I would just like to do a short test of the equipment before we begin.

All responses will be kept confidential. This means that any information I include in my thesis will not identify you as the respondent. Remember, you don't have to talk about anything you don't want to and you may end the interview at any time.

Are there any questions about what I have just explained?

Are you willing to participate in this interview?

Could I ask you to sign this Informed Consent?

Question Schedule

1. Is accreditation of providers essential?
2. The regulatory environment is seen by tuition providers to be complex and onerous. Why do you think this is the case?
3. Who are your most important stakeholders?
4. Do you invite tuition providers to participate in stakeholder forums? How do you invite them? what kind of response do you get?
5. Have any issues raised by tuition providers at such a forum been incorporated into policies and practices? Explain how this happens.
6. With regard to quality assurance, what are some of the negative issues that you have experienced?
7. With regard to quality assurance, what are some of the positive issues that you have experienced?
8. What suggestions do you have to address the challenges that you have experienced with regard to quality assurance?
9. There are so many changes taking place in the educational environment at present. What do you think about the future of private post-school education and training?

Closure:

Is there anything more you would like to add?

I'll be analyzing the information you and others gave me and submitting a draft report to UNISA in the next three months. I'll be happy to send you a copy to review at that time, if you are interested.

Thank you for your time.

Follow up

What to do following the interview (Example: Fill in notes? Check audiotape for clarity? Summarize key information for each? Submit written findings?)

Informed consent
Quality assurance challenges of private post-school providers of education and training

I _____ consent to participating in this interview.

Signed: _____

NAME: _____

Date: _____

Witness: _____

APPENDIX C: CEO INTERVIEW PROTOCOL AND QUESTION SCHEDULE

I want to thank you for taking the time to meet with me today.

My name is Jacqui Baumgardt and I would like to talk to you about your experiences with the accreditation and quality assurance of tuition providers.

The interview should take about an hour. I will be taping the session because I don't want to miss any of your comments.

Although I will be taking some notes during the session, I can't possibly write fast enough to get it all down. Because we're on tape, please be sure to speak up so that I don't miss your comments. I would just like to do a short test of the equipment before we begin.

All responses will be kept confidential. This means that any information I include in my thesis will not identify you as the respondent. Remember, you don't have to talk about anything you don't want to and you may end the interview at any time.

Are there any questions about what I have just explained?

Are you willing to participate in this interview?

Could I ask you to sign this Informed Consent?

Question Schedule

1. Is accreditation of providers essential? Why do you think so?
2. In your opinion, is quality assurance a different process from accreditation? Please explain.
3. The regulatory environment is seen by tuition providers to be complex and onerous. Why do you think this is the case?
4. Who are your most important stakeholders?
5. Do you attend any stakeholder forums? How do you get invited to them?
6. Have any issues raised by you at such a forum been incorporated into policies and practices? Explain how this happens.
7. With regard to accreditation or quality assurance, what are some of the negative issues that you have experienced?
8. With regard to accreditation or quality assurance, what are some of the positive issues that you have experienced?
9. What suggestions do you have to address the challenges that you have experienced with regard to accreditation or quality assurance?
10. There are so many changes taking place in the educational environment at present. What do you think about the future of private post-school education and training?

Closure:

Is there anything more you would like to add?

I'll be analyzing the information you and others gave me and submitting a draft report to UNISA in the next three months. I'll be happy to send you a copy to review at that time, if you are interested.

Thank you for your time.

Follow up

What to do following the interview (Example: Fill in notes? Check audiotape for clarity? Summarize key information for each? Submit written findings?)

Informed consent
Quality assurance challenges of private post-school providers of education and training

I _____ consent to participating in this interview.

Signed: _____

NAME: _____

Date: _____

Witness: _____

APPENDIX D: FOCUS GROUP QUESTION SCHEDULE

1. Is accreditation of providers essential?
2. To what extent do you believe that the staff of your ETQA comply with the Code of Conduct for Public Servants (2001) which states that they must
 - put the public interest first in the execution of their duties?
 - serve the public in an unbiased and impartial manner in order to create confidence in the public service?
 - be polite, helpful and reasonably accessible in their dealings with the public, at all times treating members of the public as customers who are entitled to receive high standards of service?
 - recognise the public's right of access to information, excluding information that is specifically protected by law?
3. If you have identified any negative issues with regard to your ETQA, please indicate what you think the cause or causes are, for example:
 - Poor management or lack of leadership
 - Poor or inadequate systems in place
 - Onerous QA requirements
 - Inappropriate staffing
 - Long turnaround times
 - Inconsistent interpretation of QA requirements by staff
 - Many reiterations and resubmissions of information
 - Corruption
 - Other
4. Do you know who the people are in the ETQA who processed your application for accreditation? Have you always dealt with the same person in connection with your application? Are you able to submit comments to your ETQA e.g. via a website link/ in writing, etc? If you answered yes to the previous question, have any of your comments been acknowledged? Have any of your comments or suggestions been incorporated into your ETQA policies and practices?
5. Have you ever been invited to participate in a stakeholder forum organised by any ETQA? Have you ever participated in such a forum? Have any issues raised by you at such a forum been incorporated into policies and practices?
6. If you have identified any "pockets of excellence" within your ETQA, please describe them
7. What follows is a series of positive statements regarding accreditation. Please comment on any or all of these statements.
 - I support the idea of accreditation.
 - Accreditation adds value to my business.
 - I use my accreditation status to market my courses.
 - Accreditation is perceived with value by my clients.
 - Accreditation has a beneficial effect on overall competitiveness of training providers.
 - Accreditation should be an option for private providers.
 - Once a provider has been accredited, this should be sufficient unless there are complaints about the organisation.
 - Accreditation has helped us to improve our pass rates.
 - Costs of accreditation should be borne by the government.
 - Costs of accreditation should be charged on a sliding scale depending on the provider's annual turnover.
8. With regard to quality assurance, please comment as you see fit on the following statements
 - Quality assurance is a business imperative for our organisation.
 - A private provider should only need to be quality assured by one quality assurance body.
 - As a private provider, we should be allowed to choose our own quality assurance model.
 - The government has too much influence in private education and training.
 - Site visits are an essential part of an accreditation audit.
 - Audits should be conducted by independent consultants not by ETQA officers.
 - A single version of the accreditation audit tool should be used in all sectors.
 - There should be different accreditation requirements for small providers.
 - There is sufficient stakeholder consultation by the ETQAs regarding quality assurance.

- There is consistency of quality assurance practices or measures within the ETQA, e.g. different verifiers or programme evaluators have the same interpretations.
 - Programme evaluators should be academically qualified in the programme they are evaluating.
 - Quality assurance has helped us to improve our pass rates.
9. Who are your most important stakeholders?
 10. What suggestions do you have to address the challenges that you have experienced with regard to quality assurance?

APPENDIX E: QUESTIONNAIRE FOR CEOS OF PROFESSIONAL BODIES

INFORMED CONSENT TO PARTICIPATE IN A SURVEY

Quality Assurance Challenges for Private Providers in Post-School Education in South Africa

This research project on "Quality Assurance Challenges for Private Providers in Post-School Education in South Africa" is being conducted by Jacqueline Baumgardt for purposes of obtaining her Doctorate in Education (specialising in Education Management). The purpose of the study is to investigate the experience of quality assurance by tuition providers in the private education arena and may therefore provide some input into future policy development of the educational authorities. Please note that this has not been commissioned by any regulatory authority and it is not funded by anyone other than the author herself.

You are being asked to take part in this study because your institution is a professional body. Your participation will take approximately 20 minutes. Please be aware that you are not required to participate in this research and you may discontinue your participation at any time without penalty. You may also omit any items on the questionnaire(s) you prefer not to answer, including the identity of your organisation.

At no time will the name of your institution or any of your staff or students be revealed. Information will be coded in order to ensure this and the only person who will have access to this information is the researcher, herself.

My credentials in this regard can be confirmed by Dr Lekhetho at UNISA (lekhem@unisa.ac.za).

Thank you.

JACQUI BAUMGARDT

Contact: 031 7083971

Cell: 084 4879285

email: jaybee@telkomsa.net

1. Have you read the letter of informed consent? Yes/No
2. Do you agree voluntarily to participate in this survey? Yes/No. If your answer is No, please exit the survey.
3. By which quality council, if any, is your organisation accredited? Mark as many as are applicable.
 - The Council on Higher Education
 - The Quality Council for Trades and Occupations
 - UMALUSI
 - None
4. If you would you prefer to be accredited by a different quality council, please indicate which one.
 - The Council on Higher Education
 - The Quality Council for Trades and Occupations
 - UMALUSI
 - None
5. Is your organisation registered with the Department of Higher Education and Training? Yes/No
6. By which SETA, if any, is your organisation currently accredited? If accredited by more than one, please list all of them.
7. How many private providers has your organisation accredited?
8. In terms of SAQA's classification of providers, please indicate what percentage of providers in your sector are:
 - Survivalist - single person, no staff
 - Small - fewer than 10 staff
 - World-competitive small scale - between 10 and 50 staff
 - Large - more than 50 staff
9. What percentage of your providers are workplace providers?
10. What percentage of the accredited providers in your sector fall into the following bands:
 - ABET
 - FET
 - HET
11. Which of the following quality assurance criteria have been found to be areas of concern in accrediting providers? Select as many as are applicable.
 - The defined mission of the institution
 - Governance and the administrative structure of the institution
 - Qualifications of teaching staff
 - Financial resources and issues of institutional sustainability
 - Physical facilities
 - Student support services
 - Teaching and learning resources
 - Accountability and reporting systems
 - Other
 - None
12. With reference to the previous question, please explain what the specific problems are that you may have encountered
13. Are you satisfied with the current regulatory accreditation and registration requirements? Yes/No
14. If you answered no to the previous question, please provide reasons why?
15. What suggestions do you have for improving the regulatory regime for private providers?

APPENDIX F: QUESTIONNAIRE FOR ETQA MANAGERS

INFORMED CONSENT TO PARTICIPATE IN A SURVEY

Quality Assurance Challenges for Private Providers in Post-School Education in South Africa

This research project on "Quality Assurance Challenges for Private Providers in Post-School Education in South Africa" is being conducted by Jacqueline Baumgardt for purposes of obtaining her Doctorate in Education (specialising in Education Management). The purpose of the study is to investigate the experience of quality assurance by tuition providers in the private education arena and may therefore provide some input into future policy development of the educational authorities. Please note that this has not been commissioned by any regulatory authority and it is not funded by anyone other than the author herself.

You are being asked to take part in this study because your institution is or has been an Education and Training Quality Assurer. Your participation will take approximately 15 minutes. Please be aware that you are not required to participate in this research and you may discontinue your participation at any time without penalty. You may also omit any items on the questionnaire(s) you prefer not to answer, including the identity of your organisation.

At no time will the name of your institution or any of your staff or students be revealed. Information will be coded in order to ensure this and the only person who will have access to this information is the researcher, herself.

My credentials in this regard can be confirmed by Dr Lekhetho at UNISA (lekhem@unisa.ac.za).

Thank you.

JACQUI BAUMGARDT
Contact: 031 7083971
Cell: 084 4879285
email: jaybee@telkomsa.net

5. Have you read the letter of informed consent? Yes/No
6. Do you agree voluntarily to participate in this survey? Yes/No. If your answer is No, please exit the survey.
3. How many accredited private providers do you currently have in your sector/band?
4. In terms of SAQA's classification of providers, please indicate what percentage of providers in your sector are
 - Survivalist
 - Small
 - World-competitive small
 - Large
5. What percentage of providers in your sector are workplace providers?
6. What percentage of the accredited providers in your sector fall into the following bands?
 - ABET
 - HET
 - FET
7. On the following scale, identify whether the following factors are cause for concern with the private providers that you accredit.
 - Non registered providers who are purporting to deliver nationally recognised training
 - Lack of appropriate qualifications of lecturers/facilitators
 - The resources, facilities and premises of the provider
 - False marketing and advertising
 - Misleading student information
 - Handing of student complaints and appeals
 - Poor understanding of Recognition of Prior Learning
 - Inadequate assessment of learners
 - Inadequate moderation of learner results
 - Inappropriate issuing of certificates and statements of results
 - Unofficial or non-accredited training offered by the provider
 - Corruption
 - Non-delivery on tenders
 - Poor supervision of students
 - Other
8. If you listed other as an answer to the previous question, please provide details below.
9. Do any the following stakeholders have a formal role in the specification of processes and criteria for the external quality assurance of private providers in your primary domain? Answer Yes or No for each item.
 - Student representatives
 - Private Higher education institutions
 - Government (central/regional)
 - Industry and labour market representatives (union, employers, etc.)
 - Professional organisations
 - Quality assurance agencies
 - Other
10. If you selected "other" in the previous question, please supply details.
11. Both the National Planning Commission (2011) and the Green Paper on Post-School Education and Training (2012) mention the need for a "more enabling regulatory environment". What suggestions do you have in this regard?

APPENDIX G: QUESTIONNAIRE FOR PRINCIPALS OF PRIVATE TUITION PROVIDERS

INFORMED CONSENT TO PARTICIPATE IN A SURVEY

Quality Assurance Challenges for Private Providers in Post-School Education in South Africa

This research project on "Quality Assurance Challenges for Private Providers in Post-School Education in South Africa" is being conducted by Jacqueline Baumgardt for purposes of obtaining her Doctorate in Education (specialising in Education Management). The purpose of the study is to investigate the experience of quality assurance by tuition providers in the private education arena and may therefore provide some input into future policy development of the educational authorities. Please note that this has not been commissioned by any regulatory authority and it is not funded by anyone other than the author herself.

You are being asked to take part in this study because your institution is a training provider. Your participation will take approximately 20 minutes. Please be aware that you are not required to participate in this research and you may discontinue your participation at any time without penalty. You may also omit any items on the questionnaire(s) you prefer not to answer, including the identity of your organisation. Please note that no compensation or reward is offered for your participation.

At no time will the name of your institution or any of your staff or students be revealed. Information will be coded in order to ensure this and the only person who will have access to this information is the researcher, herself.

My credentials in this regard can be confirmed by Dr Lekhetho at UNISA (lekhem@unisa.ac.za).

The study will be made available online by UNISA once it has been approved.

Thank you.

JACQUI BAUMGARDT
Contact: 031 7083971
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7. Have you read the letter of informed consent? Yes/No
8. Do you agree voluntarily to participate in this survey? Yes/No. If your answer is No, please exit the survey.
9. Are you
 - An accredited private provider
 - An accredited workplace provider
 - An unaccredited private provider
 - A candidate private provider (i.e. application in process)
 - Other
4. If you are unaccredited or not planning to apply, please explain why.
5. What kind of training do you offer?
 - Whole qualifications
 - Unit standards
 - Short courses
6. How many qualifications do you offer?
7. How many unit standards do you offer?
8. How many short courses do you offer?
9. What is the average duration of your short courses?
10. In terms of SAQA's classification of SMME providers how would your organisation be classified?
 - Survivalist = 0 - 4 staff, less than R1m turnover, less than R1m assets
 - Small = 5 - 10 staff, between R1m and R5m turnover, between R1m and R5m assets
 - World class competitive small = 11 - 50 staff, between R5m and R10m, turnover, between R5 m and R10m assets
 - Large = 51+ staff, more than R10m turnover, more than R10m assets
12. Please identify your student profile.
 - Racial composition
 - Educational background(e.g. Matriculant, non-matriculant.)
 - Financial Background: (privileged; self-funded; poor/rich, etc.)
 - Socio-economic profile (e.g. school leaver; mature, employed/unemployed, etc)
 - Nationality (e.g. South African; foreign students from.)
13. By which quality assurance bodies is your organisation registered or accredited? Mark as many as are applicable.

<ul style="list-style-type: none"> • Department of Basic Education (DoBE) • Department of Higher Education and Training (DHET) • Higher Education Quality Council (HEQC) • Quality Council on Trades and Occupations (QCTO) • UMALUSI (GENFETQA) 	<ul style="list-style-type: none"> • AGRISETA • BANKSETA • CETASETA • CHIETA • CATHSSETA • CTFLSETA • ESETA • ETDPSSETA • FASSET • HWSETA • MICTSETA • INSETA 	<ul style="list-style-type: none"> • LGSETA • MERSETA • MQASETA • PSETA • SASSETA • SERVICESETA • SSDSETA • TETASETA • W&RSETA • Not accredited • Other
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14. Compliance with the Code of Conduct for Public Servants (2001). To what extent do you believe that the staff of your ETQA:
 - put the public interest first in the execution of their duties?
 - serve the public in an unbiased and impartial manner in order to create confidence in the public service?
 - are polite, helpful and reasonably accessible in their dealings with the public, at all
 - times treating members of the public as customers who are entitled to receive high standards of service?
 - recognise the public's right of access to information, excluding information that is specifically protected by law?
13. Please add your comments about your answers on the previous question.
14. NON-PERFORMANCE - If you have identified any negative issues with regard to your ETQA, please indicate what you think the cause or causes are. Mark as many as apply.

- Poor management or lack of leadership
 - Poor or inadequate systems in place
 - Onerous QA requirements
 - Inappropriate staffing
 - Long turnaround times
 - Inconsistent interpretation of QA requirements by staff
 - Many reiterations and resubmissions of information
 - Corruption
 - Other – please describe briefly below
15. If you selected other in the previous question, please explain briefly below:
16. If you have identified any "pockets of excellence" within your ETQA, please describe them briefly below.
17. Are you a member of any private association for providers? Please insert details below.
18. Please answer yes or no to each of the following questions.
- I support the idea of accreditation.
 - Accreditation adds value to my business.
 - I use my accreditation status to market my courses.
 - Accreditation is perceived with value by my clients.
 - Accreditation has a beneficial effect on overall competitiveness of training providers.
 - Accreditation should be an option for private providers.
 - Once a provider has been accredited, this should be sufficient unless there are complaints about the organisation.
 - Accreditation has helped us to improve our pass rates.
 - Costs of accreditation should be borne by the government.
 - Costs of accreditation should be charged on a sliding scale depending on the provider's annual turnover.
19. Please comment on your answers to the previous question.
20. With regard to quality assurance, please indicate whether you agree or disagree with each of the following statements.
- Quality assurance is a business imperative for our organisation.
 - A private provider should only need to be quality assured by one quality assurance body.
 - As a private provider, we should be allowed to choose our own quality assurance model.
 - The government has too much influence in private education and training.
 - Site visits are an essential part of an accreditation audit.
 - Audits should be conducted by independent consultants not by ETQA officers.
 - A single version of the accreditation audit tool should be used in all sectors.
 - There should be different accreditation requirements for small providers.
 - There is sufficient stakeholder consultation by the ETQAs regarding quality assurance.
 - There is consistency of quality assurance practices or measures within the ETQA, e.g. different verifiers or programme evaluators have the same interpretations.
 - Programme evaluators should be academically qualified in the programme they are evaluating.
 - Quality assurance has helped us to improve our pass rates.
21. Please comment on your answers to the previous question.
22. With regard to accreditation, please answer yes or no to each of the following questions.
- If you are accredited by more than ETQA (e.g. a SETA and DHET), does each of them use the same criteria for accreditation?
 - Has your organisation had an audit done in terms of any other QA systems e.g. ISO 9000, Baldrige, Six Sigma?
 - Do you know who the people are in the ETQA who processed your application for accreditation?
 - Have you always dealt with the same person in connection with your application?
 - Are you able to submit comments to your ETQA e.g. via a website link/ in writing, etc?
 - If you answered yes to the previous question, have any of your comments been acknowledged?
 - Have any of your comments or suggestions been incorporated into your ETQA policies and practices?
 - Have you ever been invited to participate in a stakeholder forum organised by any ETQA?
 - Have you ever participated in such a forum?
 - Have any issues raised by you at such a forum been incorporated into policies and practices?
23. Please comment on your answers to the previous question.
24. Please rank the following list of stakeholders in terms of their importance to your business (1 being most important and 10 being least important). If they are equally important, rank them at the same level.

- Regulatory authorities (e.g. DHET)
 - Quality Councils
 - Your SETA
 - Learners
 - Parents
 - Employers
 - Community
 - Investors/shareholders
 - Funders of learners
 - Staff
25. If you have had an audit done in in terms of another QA system, apart from the regulatory one, please state which system has been used.
26. Which system has been a better tool for your organisation? (ETQA QA system or other QA system). Explain why.
27. What suggestions do you have to address the challenges that you have experienced with regard to quality assurance?
28. If you would like to add any other comments on any matter, please do so in the space provided below.