



higher education
& training

Department:
Higher Education and Training
REPUBLIC OF SOUTH AFRICA

RECOMMENDATIONS AND PROPOSED
AMENDMENTS TO THE RECOGNITION OF
PRIOR LEARNING COORDINATION POLICY
(2016)

March 2021

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1. Introduction

The National Qualifications Framework (NQF) provides a framework for communication, coordination and collaboration across education, training, development and work. The Minister of Higher Education, Science and Innovation has the overall executive authority of the NQF, the South African Qualifications Authority (SAQA) and the three Quality Councils (Council on Higher Education (CHE), Quality Council for Trade and Occupations (QCTO) and Umalusi). His responsibility is to advance the objectives of the NQF, including recognition of prior learning (RPL). The objectives of the NQF are designed to contribute to the full personal development of each learner/student and the social and economic development of the nation at large. These objectives aim to achieve an integrated approach based on outcomes that can be assessed for purposes of mobility, portability, progression and for redress through the recognition of prior learning.

The *White Paper for Post-School Education and Training* (2014) (the White Paper), states that “RPL is a key approach to redressing past injustices and recognising competence gained through practical workplace learning and experience”. RPL is therefore a critical mechanism to address discrimination and carries particular significance as it is central to an inclusive, democratic education and training system. It is part of a national drive to build a learning culture and a learning nation. In order for RPL to be fully realised as part of the education and training system, it needs to be given concrete expression in the policies and practices of education and training providers and practitioners.

The Department of Higher Education and Training (the Department), SAQA and the three Quality Councils have established an enabling policy environment for RPL. The Department published the *RPL Coordination Policy* in 2016 (Government Notice No. 381 of 2016). The Policy intends to provide an enabling policy environment for the further development and implementation of RPL across the post-school education and training (PSET) system.

The evaluation finding from the *Implementation Evaluation of the NQF Act, 2008 Report (2018)* however, indicates that although pockets of RPL is being implemented in the education and training system, its implementation is hampered by inter alia the lack of policy coherence in the system. The report echoes the White Paper’s call for the simplification of the NQF.

Simplification of the NQF can be achieved through a number of strategies such as the review of NQF-related policies (Draft *National Plan for Post-School Education and Training* (NP-PSET), unpublished).

Therefore, there is a need for the review of the policy environment, and in specific the *RPL Coordination Policy*, 2016. This is also reflected in the Department's Annual Performance Plan 2020/21.

2. Purpose of this document

The purpose of this document is to inform the Director-General about the coordination and implementation of RPL in South Africa and to provide recommendations and proposed amendments to the *RPL Coordination Policy*, 2016.

3. Methodology

In order to conceptualise RPL coordination and implementation a desktop study of legislation, policies and reports related to RPL was conducted. The documents that were considered include:

- *National Qualifications Framework (NQF) Act*, 2008;
- *General and Further Education Training Quality Assurance Act*, 2008 (Act No.50 of 2008);
- *Higher Education Act*, 1997 (Act No. 101 of 1997);
- *Skills Development Act*, 1998 (Act No. 97 of 1998);
- *Report of the Ministerial Task Team on a National Strategy for the Recognition of Prior Learning* (2013);
- *White Paper for Post-School Education and Training* (2014);
- RPL Policies of SAQA, Umalusi, QCTO, CHE, Professional Bodies, and Sector Education and Training Authorities (SETAs);
- *Report on the Implementation Evaluation of the NQF Act, 2008* (2018);
- *2017 NQF Impact Study Report* (SAQA, March 2019); and
- *Draft National Plan for Post-School Education and Training* (no date).

Furthermore, several engagements were held to consult stakeholders on the review of the *RPL Coordination Policy*, 2016. The last meeting was held and attended by the Department, the National Artisan Moderating Body (NAMB), SAQA and the three Quality Councils.

4. What is Recognition of Prior Learning in South Africa?

There is consensus among stakeholders that RPL is the “**principles and processes through which the prior knowledge and skills of a person are made visible, mediated and assessed, for the purposes of alternative access and admission, recognition and certification, or further learning and development**” (NQF Pedia, 2018).

RPL in South Africa is:

- **Multi-contextual** - it differs in purpose and form across different contexts. It may be developed and implemented differently for example, for the purposes of personal development; access or advanced placement in institutions of learning; or recognition in workplaces. RPL can be carried out at any NQF level, and can lead to the granting of credit towards part of, or whole, qualifications in some contexts.
- **Multi-dimensional** - including identification, mediation, assessment and recognition of informal and non-formal learning - and usually includes guidance and counselling, preparation for assessment, and where appropriate, post-RPL top-up (gap-fill) training. While assessment is an integral feature of all RPL in the country, assessment is not treated in isolation from these other steps in the RPL processes.

5. Forms of Recognition of Prior Learning

There are two main forms/uses of RPL:

- RPL for access: To provide an alternative access route into a programme of learning for those who do not meet the formal entry requirements for admission; and
- RPL for credits: To provide for the awarding of credits for a qualification or part-qualification registered on the NQF.

In addition, the consultations highlighted, RPL is also used for *inter alia*:

- Access into the External Integrated Summative Assessment (EISA);
- Access to a trade test through Artisan RPL (ARPL);
- Access/credit for Professional Designations;
- Recognition and promotion in the workplaces (RPL for advancement); and
- Towards granting a full qualification. However, institutions due to unfavourable legislative environment, are not readily implementing this.

6. Benefits of Recognition of Prior Learning

If RPL is integrated into education and training systems, it will have positive impact to education and training, the labour market, the economy, and society as a whole. The table below illustrates the potential benefits of RPL (International Labour Organisation, 2018).

Table 1: Potential benefits of RPL

Potential benefits at the economic and educational level	
Increased employability of population for a healthier labour market	<ul style="list-style-type: none"> • Improved ability of employers to identify new hires and fill their vacancies • Potentially reduced unemployment and inactivity • Reduced pressure on the labour market as alternative pathways to employment become available • Reduced skills mismatch issues • Reduced qualification shortages (if applied specifically in sectors where qualified workers – workers with documented competencies – are in high demand) • Eased transition from the informal to the formal economy • Increased ability of the labour market to offer decent jobs
Increased education, training and labour mobility	<ul style="list-style-type: none"> • Facilitated movement of individuals to a better education or job • Increased ability of employed people to change career and employer • Expanded opportunities for movements of students/workers from rural to urban areas and across borders
Improved access to formal education and training	<ul style="list-style-type: none"> • Reduced time and financial resources needed to obtain a qualification, making it more affordable and accessible for applicants to further their educational attainment • Expanded access to lifelong learning
Strengthened qualifications system	<ul style="list-style-type: none"> • Reinforced qualifications system providing a bridge between the informal and formal economy • Strengthened lifelong learning framework as RPL creates new opportunities for achieving a qualification
Potential benefits at societal level	
Social inclusion and recognition	<ul style="list-style-type: none"> • Enhanced capacity of societies to empower disadvantaged groups
More motivated labour force	<ul style="list-style-type: none"> • Improved visibility and use of existing human capital
More interest in lifelong learning	<ul style="list-style-type: none"> • Recognised value of services, such as voluntary and unpaid work
Potential benefits at Personal level	
Psychological benefit	<ul style="list-style-type: none"> • Strong self-esteem, confidence, and motivation to work and learn including among those formerly discouraged
Higher individual returns to work experience	<ul style="list-style-type: none"> • Improved opportunities to access jobs that match individuals' competencies • Reduced costs of education, including in terms of time investment required to attain a qualification • Increased opportunities to move from the informal to the formal economy

7. Barriers/Challenges in implementing RPL

There are significant barriers to the widespread implementation of RPL in different sectors of the PSET system. In some cases, these barriers emanate from contradictions and ambiguities in

policies and legislation. Some of the barriers/challenges highlighted during the consultation processes include the following:

Legislation, policy regulations, frameworks and guidelines

The RPL legislative environment should support implementation of RPL. However, significant challenges have been recorded. An example is the implementation of RPL in the Higher Education Qualifications Sub-Framework (HEQSF) context:

- a) RPL may be used for access and advanced standing, but may not translate into credits (in other words, there is no RPL for credit);
- b) RPL cannot be used to grant an individual the exemption from more than 50% of the modules/courses required for any qualification. This means that a person must obtain 50% of the qualification at the institution that is going to award the certificate; and
- c) Not more than 10% of a cohort of students in a programme may be admitted through RPL (under exceptional circumstances, entities may motivate for more than 10%).

Lack of trust in the quality of qualifications gained through RPL

The lack of trust in the quality of qualifications gained through RPL results in the following:

- a) Resistance by academics to support RPL;
- b) Reluctance of employers to provide ARPL opportunity to deserving artisanal workers; and
- c) Qualifications of part-qualifications achieved through RPL are not recognised.

The following possible interventions have been identified:

- a) RPL must be acknowledged and implemented as an integral route to gain access or to achieve a qualification;
- b) A need for advocacy and to create awareness of RPL in learners, workers and workplaces. RPL must be “declared as a viable option to achieve qualifications” on a national platform;
- c) A need for building RPL capacity at all levels of the system;
- d) A strategy to record and report on learners coming through the RPL route;
- e) A funding strategy to ensure that RPL is cost effective for institutions and learners/students; and
- f) RPL practices in general, but learner support in particular, should be quality assured and monitored.

Funding (high costs of RPL, insufficient funds for supporting RPL)

Funding is a barrier to the widespread application of RPL programmes and services in public institutions. At present, there is no formal, systemic funding mechanism for RPL in the PSET

system. Although institutions must integrate RPL in their operations and fund their own RPL activities, including the development of procedures and infrastructure as needed, there is no national directive/enabling environment to implement and fund RPL. In some cases, individual applicants are expected to pay for RPL services, but in other cases, the cost is carried by an employer or through sponsorships. There is no standard cost structure, as the contexts within which RPL is undertaken may be vastly different.

8. Overview of the Policy, Legislative and Implementation Environment

RPL is seen as an important mechanism for redress and the opening up of access to lifelong learning and employment opportunities in legislation, policies, regulations, frameworks and guidelines. There is a common understanding and recognition of its potential.

Below are examples of these mechanisms:

Constitution of the Republic of South Africa, 1996

The *Constitution of the Republic of South Africa, 1996* intends inter alia to redress imbalances of the past and by implication enables RPL implementation. Section 29 of the Constitution guarantees the right of all South Africans to basic, adult basic and further education. RPL is one of the mechanisms to realise this objective.

National Qualifications Framework Act, 2008

The *NQF Act, 2008* is the enabling legislation for RPL. The Act assigns very specific RPL-related responsibilities to SAQA, and the Quality Councils. According to Section 13(1)(h)(iii), SAQA is mandated to develop policy and criteria for RPL, assessment, and credit accumulation and transfer (CAT). Section 27(h)(1) mandates the Quality Councils to develop and implement policy and criteria, taking into account the policy and criteria contemplated in section 13(1)(h)(iii) for assessment, RPL and CAT.

Higher Education Act, 1997 (Act No. 101 of 1997)

The *Higher Education Act, 1997* creates the environment for RPL to be implemented in higher education institutions. Evidenced by recognition of the need for redress, the provision of optimal opportunities for learning, promotion of values, and the promotion of the full realisation of the potential of every student and employee are reflected in the Act. However, Section (4)(a) to (d) could be read in such a way that there appears to be a silent challenge to RPL being implemented

in higher education institutions. The issue of the 50% residency clause and the restriction on RPL admission to a 10% cohort, remain an issue of concern.

Skills Development Act, 1998 (Act No. 97 of 1998)

The *Skills Development Act*, 1998 provides for an institutional framework for the implementation of national, sector and workplace strategies, with the purpose of improving the skills of the South African workforce. This Act is explicit on the need for redress through education and training, to improve the employment prospects of persons previously disadvantaged by unfair discrimination and to redress those disadvantages through training and education (Section 2(1)(e)).

General Education and Training Qualifications Act, 2001 (Act No. 58 of 2001)

The *General and Further Education and Training Qualifications Act* (GENFETQA) (Act No. 58 of 2001, as amended in Act No. 50 of 2008), is silent about RPL, but there are references to assessment and accreditation of providers.

RPL Coordination Policy, 2016

The *RPL Coordination Policy*, 2016 provides a policy statement to ensure that the objectives of the *NQF Act*, 2008 are met, and especially to:

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

It furthermore aims to provide an enabling policy environment for the development and implementation of RPL across the PSET system, and across all levels of the NQF. The policy specifically directs to the establishment of a coordinating mechanism for RPL (in two phases), the funding thereof, and the establishment of a fund for RPL implementation. It also guides the implementation of RPL, especially as regards the roles and functions of the Department, SAQA, the Quality Councils, the national coordinating mechanism and the funding mechanisms for RPL implementation.

Other RPL Policies

There are various RPL policies at different levels of the PSET system. In addition to the RPL-related policies by SAQA and the Quality Councils, external stakeholders such as Professional Bodies, SETAs, public and private education and training providers, Government departments

and other workplaces have RPL-related implementation policies. These stakeholders are responsible for implementing RPL according to the national policies by SAQA and the Quality Councils (RPL related to qualifications in specific sub-frameworks of the NQF).

RPL initiatives and work done/being done

The Department, SAQA, Quality Councils and other stakeholders have over the past years worked collaboratively towards the development and implementation of RPL. These was achieved through *inter alia*:

- National RPL Conferences in 2011 and 2014;
- Ministerial Task Team on a National Strategy for RPL (2012 – 2013);
- RPL publications, e.g. National RPL Conference: Tried and Tested Tools and Templates (2014);
- SAQA Research partnerships with universities, e.g. SAQA RPL collaborative case studies in partnership with the University of the Western Cape and the University of Cape Town; and
- 2017 NQF Impact Study which was published in 2020.

At implementation level, a majority of higher education institutions are implementing RPL using decentralised models. Because of the unique nature of RPL relating to specific qualifications, RPL is differently implemented across different faculties/department in the same institution; and differently between institutions. RPL is more prevalent in generic programmes than in specialised professional programmes; and in some institutions RPL is more prevalent in undergraduate than postgraduate programmes and vice versa (in other institutions). Some institutions have established RPL offices to support and implement RPL.

NAMB is implementing the *Criteria and Guideline for the Implementation of Artisan RPL* (ARPL, 2016). NAMB has implemented RPL in seventeen trades and three Occupational Qualifications since October 2017.

The QCTO has awarded the following Occupational Qualifications through RPL after candidates have successfully completed the EISA:

- Occupational Certificate: Toolmaker;
- Occupational Certificate: Chef;
- Occupational Certificate: Electrical Line Mechanic;
- Occupational Certificate: Tax Practitioner;
- Occupational Certificate: Principal Executive Officer; and

- Occupational Certificate: Financial Market Practitioner.

The table below shows the number of achievements through RPL that are recorded in the National Learners' Records Database, 2012 – 2018 (provided by SAQA, 2021).

Table 2: Achievements through RPL

Summary RPL Data		Total
Learners	No. of Learners who achieved one or more Qualifications via RPL	30 868
	No. of Learners who achieved one or more Unit Standards via RPL	82 282
Records of Achievement	Total Qualification Achievements through RPL	34 367
	Total Part-Qualification Achievements through RPL	1 545 305
Qualifications	Number of Qualifications achieved through RPL	224

Policy Alignment

The *2017 NQF Impact Study* identified gaps and mis-alignment in RPL Policies of SAQA and the Quality Councils. SAQA and the Quality Councils have done/is doing extensive work in this regard, viz.:

- Umalusi is in the process of finalising the *Policy on Credit Accumulation, Exemption, Recognition and Transfer* for General and Further Education;
- The QCTO's *Policy for the Implementation of RPL* has been aligned with policies of SAQA and the Quality Councils and is being implemented;
- The CHE will start with the review of the RPL, CAT and Assessment Policy for higher Education after the Department-led process to review the RPL Coordination Policy has been concluded. The fundamental difference in the Policy is that Higher Education Institutions cannot award a qualification solely on the basis of RPL as this will be in contravention of the legislation that governs them. In order to amend this, the Act may have to be amended first; and
- The 2021 NQF Impact Study is underway. The study is looking at awareness, use and impact of RPL, CAT and Articulation.

9. Proposals for the amendment of the RPL Coordination Policy, 2016

Background to the RPL Coordination Policy

The *RPL Coordination Policy, 2016* was published on 31 March 2016. The publication of the Policy was the result of an extensive development and consultation period, which started with the

establishment of the MTT on a National Strategy for RPL in 2012, the publication of their report in 2013. The *RPL Coordination Policy, 2016* therefore draws from the report and proposals from the MTT and the *White Paper for Post-School Education and Training (2014)*. It also draws on international trends in recognition and validation of non-formal and informal learning and workplace-based experiential learning, such as those expressed in the research of the International Labour Organization (ILO) and the United Nations Educational, Scientific and Cultural Organization's (UNESCO's) Institute for Lifelong Learning (UIL).

The policy recognises a range of RPL-related initiatives, some that have been underway for several years, and others that are being planned for the future, as part of an integrated strategy for policy implementation, which have been developed by SAQA and the Quality Councils.

Through literature review and extensive consultation the following proposals for amending the RPL Coordination Policy, 2016 are considered:

The existence of the Policy related to its Purpose (Paragraphs 1 – 11)

The purpose of the policy, as said above, is to provide an enabling policy environment for the further development and implementation of RPL across the PSET, and across all levels of the NQF. To do so, the policy establishes a coordinating mechanism for RPL (in two phases), the funding thereof, and the establishment of a fund for RPL implementation.

General comment:

SAQA and the Quality Councils are directed by the *NQF Act* to develop policies for RPL. According to Section 13(1)(h)(iii), SAQA is mandated to develop policy and criteria for RPL, assessment, and CAT; and section 27(h)(1) mandates the Quality Councils to develop and implement policy and criteria, taking into account the policy and criteria contemplated in section 13(1)(h)(iii) for assessment, RPL and CAT. There is therefore not space for another policy to coordinate the work. The overall purpose of the document needs to be the establishment of a framework for coordination, namely, what it aims to achieve, and the specific objectives necessary for the overall purpose to be realised. The aims and objectives could refer to intended beneficiaries of the policy's successful implementation, and how they will expect to benefit from the policy (or coordination framework).

Proposal:

This policy will be better suited to be a 'coordination framework' that allows for an implementation framework for the Quality Councils and institutions.

The scope of the Policy (Paragraphs 12 – 13)

General comment:

The scope of the policy is aligned to the proposal for a Coordination Framework.

Proposals:

- a) SAQA should have the responsibility for publishing national RPL policy;
- b) RPL should be coordinated collaboratively by the Department, SAQA and the three Quality Councils; and
- c) Each should have clear roles and responsibilities.

9.4 The legislative mandate provided through NQF (Paragraphs 18 – 20)

General Comments:

Paragraph 18 – 19: This section sufficiently describes how/from where the mandate for RPL and the need for coordination derive. It could refer to higher level policies, plans, or legislation, mandating the development of the policy.

Paragraph 20: There is general agreement that RPL policies should be aligned. However, the contexts of each Quality Council and sub-framework must be taken into consideration when developing or aligning RPL policies.

Proposals:

- a) To avoid ambiguity and misinterpretation, legal clarity must be sought on the interpretation and application of Section 8(2)(b) of the NQF Act that says, Minister must “determine policy on NQF matters in terms of this Act and publish the policy in the gazette”; and
- b) RPL varies across institutions, sites, contexts and sectors. Therefore, a one-size-fits-all approach is not likely to succeed. The practice of guidance for specific target groups rather than generic guidelines, which South Africa has tended towards, should be considered.

A national strategy for RPL (Paragraphs 15 – 17, 21 – 22 and 33)

General comments:

- a) Paragraphs 15 and 16 are describing RPL and not saying anything about a specific national strategy for RPL in the PSET sector and is therefore misplaced;
- b) Furthermore, the Department can only publish policies that are applicable to the PSET system; and
- c) Although paragraph 17 is relevant under this section; it describes a national strategy for RPL that is wider than the PSET system.

Proposal:

Paragraphs 15 and 16 are misplaced and should be removed under this section,

A national coordinating mechanism for RPL

General Comments:

- a) Paragraph 21: The establishment of a national coordinating mechanism that will drive the implementation of RPL is supported;
- b) The MTT identified four options for a national coordinating mechanism. The table below indicates the four options and provides a brief commentary; and
- c) A two-phased approach has been adopted in the policy where phase 1 locates coordination in the Department and phase 2 directs to an evaluation of the function and “comprise the publication of a form of legislation to be decided by the Minister”, therefore by implication, an external function that is legislated.

Table 3: Options for a national Coordinating mechanism

Option	Comment
a) SAQA	A national RPL system is part of lifelong learning as organising principle of the NQF. The architecture of the NQF incorporates a triad of components: RPL, Articulation and CAT, which need to be managed in a coherent manner This option could save on infrastructure but maintains the link between the NQF and RPL.
b) Department	RPL is driven by the Department in cooperation with SAQA with offices located at the Department. This option could also save on infrastructure. This is the option that was put in the policy as Phase 1.
c) Inter-Departmental	An Inter-Departmental agency is established, possibly under the auspices of the Department of Public Service and Administration. This will enable more focus on RPL.
d) Outsourced	The RPL coordinating mechanism is outsourced to an external body established for this purpose. This is the most expensive option and needs specific legislation as contemplated in the policy’s phase 2.

Proposals:

- a) Convene discussions to consider the various options for the coordination of RPL in the country. There is a need to reach consensus regarding roles and responsibilities and the form and function of a coordinating mechanism (if needed);
- b) Care must be taken not to over centralise and bureaucratise the system as this introduces more inflexible processes; and
- c) RPL should be the responsibility of providers/institutions and not as the establishment of dedicated RPL institutions as seems to be advocated in this policy.

Steps to follow in establishing a national coordinating mechanism

General comments:

Paragraph 22: The implementation of Phase 1 as directed by the policy has been concluded. The Department established a national coordinating mechanism for RPL with a Reference Group. The Reference Group was appointed in June 2019. It was chaired by Prof Bawa, Chief Executive Officer of Universities South Africa. The Reference Group comprised of representatives of the Department (Branches: Planning, Policy and Strategy, Community Education and Training, University Education and Technical and Vocational Education and Training), SAQA, the three Quality Councils, Organised Labour and RPL specialists. The Reference Group recommended several activities and initiatives such as a service provider to conduct a situational analysis of RPL in South Africa. However, the Reference Group had no access to funding and the activities/initiatives could not be implemented due to financial constraints. The Reference Group concluded its work and was dissolved in August 2020.

Paragraph 23 and 24: The policy determines that after initial set-up phase within the Department, the oversight of the national coordinating mechanism will be revised after a period of time. It states that an evaluation study of the work done in Phase 1 will be conducted, which will guide the second phase of the establishment of the National RPL Coordinating Mechanism. The second phase will comprise of a publication of a legislation to be decided by the Minister. This should be implemented within five years after the establishment of Phase 1.

The Department, in collaboration with SAQA and the Quality Councils have initiated work to review the mechanism. In this process it was evident that the *RPL Coordination Policy, 2016* must first be reviewed to align it with legislation and the NP-PSET.

Funding (Paragraphs 25 – 30, 37 – 38)

General comments:

- a) Although RPL undoubtedly has many benefits, the cost can be a barrier to its wide-spread implementation, in particular to meeting the learning needs of the disadvantaged. Developing a sustainable implementation model with a funding mechanism is thus key to establishing an RPL system;
- b) In the Policy, funding for RPL is differentiated:
 - Funding of the National Coordinating Mechanism for RPL (paragraphs 25-26); and
 - Funding for RPL implementation (paragraphs 27 – 30 and 37 – 38).

- c) The MTT recommended that further research on funding and costing of RPL is needed. They proposed three funding models for South Africa:
 - Model 1: Wholly state funded;
 - Model 2: State and employer funding; and
 - Model 3: State and employer funding with student fees;
- d) Paragraph 25 of the policy indicates that the coordinating mechanism will be primarily state-funded. This needs to be interrogated further to ensure feasibility and sustainability;
- e) In paragraph 27, it is mentioned that consideration will be given to identifying sources of funds to a dedicated RPL Implementation Fund. This notion will need to be revisited as this may not be a solution; and
- f) NAMB is establishing an advisory body to advise the Minister together with the National Economic Development and Labour Council on artisan related issues including funding.

Proposals:

- a) There should be more information on what funding is required outside the allocation to institutions, because a dedicated RPL unit in each institution with trained RPL practitioners is needed to ensure successful implementation of RPL;
- b) A national RPL mechanism is not feasible because funding has to be sought from other sources;
- c) Consider introducing legislated tax breaks for companies for employees who achieve qualifications through RPL (some kind of incentive for RPL);
- d) Tax rebates proposed for employers would have to make financial and business sense to entice employers to do RPL in the workplace; and
- e) Conduct a rigorous assessment process to quantify costs for RPL development and implementation.

Roles and responsibilities

General comments:

- a) The policy outlines the roles and responsibilities of role players that will need to effect the policy and of those that will be affected by the policy. This section should be revisited to ensure that there is no duplication and/or misallocated roles and responsibilities; that it fits the change to a coordination framework; and that there are no unfunded mandates;
- b) There is concern that paragraph 32(b) suggests that RPL centres should be set up. While it is agreed that conducting RPL might be a specialised approach, it is necessary to ensure that every provider/institution has this capacity. Centralising RPL will just become a technical

process whereas the real subject matter expertise is located at institutions and assessment centres; and

- c) A centralised on-line system for RPL is seen as a viable route going forward, but has to be investigated.

10. Recommendations

The following recommendations are made:

- a) RPL must be adopted in the PSET system as an institutional competence that every provider/institution has to implement to address inequalities and redress the imbalances of the past;
- b) Legal clarity must be sought on the interpretation and application of Section 8(2)(b) of the NQF Act that says, Minister must “determine policy on NQF matters in terms of this Act and publish the policy in the gazette”. It must either be clarified in the amendment of the NQF Act process and clarified within the NQF context;
- c) The Department should reformulate the *RPL Coordination Policy, 2016* as a ‘coordination framework’ for the implementation of RPL;
- d) The ‘Coordination Mechanism’ of RPL has to be fleshed out. In terms of the *NQF Act*, SAQA is in a position to be responsible for coordinating RPL in the country. If SAQA becomes the national coordinating mechanism, roles and responsibilities have to be clarified and appropriate funding strategies developed. SAQA should be requested to develop a five-year costed implementation plan that is specific, measurable, achievable, realistic and time-bound;
- e) The Department should address the funding of RPL as part of the national allocation to institutions. A funding model for the National Coordinating Mechanism and the implementation of RPL should be devised. For example, the funding formula can be restructured to include funding for RPL development and implementation in institutions and top slicing for the coordination thereof; and
- f) The Department, in collaboration with SAQA and the Quality Councils must conduct research to among other things, understand the barriers of RPL more fully, and following through with actions until the barriers are addressed.