higher education
& training

Department:
Higher Education and Training
REPUBLIC OF SOUTH AFRICA

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

March 2022

Contents

1. Introduction

The origins of Recognition of Prior Learning (RPL) as a key principle and component of the education and training system in South Africa has its roots in the policy initiatives that prevailed in the early 1980s to 1990s and gave it a prominent place in the early construction of the National Qualifications Framework (NQF). RPL was introduced as a principle closely aligned to three key elements as part of[1]:

(a) The overarching discourse of transformation, to redress past injustices and ensure effective access to learning;

(b) A discourse of accreditation and lifelong learning, to render explicit and certifiable knowledge and skills that are acquired experientially; and

(c) The discourse of an integrated NQF, to enhance the flexibility and articulation capabilities of the system with reference to all forms of learning and the development of a national credit accumulation and transfer scheme.

RPL is seen as a key feature of the NQF and its objectives which 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.

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[1] Alan Ralphs, 2011. Exploring RPL: Assessment Device and/or Specialised Pedagogical Practice? Published in the Journal of Education, 2012, Vol. 53 pp.75-96

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.

2.   What is RPL 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).

This means that as a principle, RPL endorses the value of giving recognition to knowledge and skills that have been acquired outside a formal learning programme. As a process, RPL consists of a range of educational and training activities and services through which the principle of RPL is applied and learners are supported in different contexts as they go through the RPL process. These activities and services include the provision of RPL-related information; advising, coaching, and administration services; alternative access programmes; integrated curriculum design; and a variety of formative and summative assessment practices.

RPL in South Africa is:
(a) **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.

(b) **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.

3. Forms of RPL

RPL in South Africa is mostly used as follows:

(a) **RPL for access** is most commonly associated with the provision by formal education providers of an alternative route of entry for those who do not meet the prerequisites for admission to a specific programme or course. and

(b) **RPL for credits** is used 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 unfavorable legislative environment, are not readily implementing this.

4. Benefits of RPL

RPL in the view of the Ministerial Task Team on a National Strategy for RPL (MTT) Report, 2013 "will enhance economic, environmental, social and personal development". RPL is emancipatory and can and should provide access to lifelong learning opportunities, and to the global knowledge economy" (DHET, 2016:6). If RPL is integrated into education and training systems, it will have positive impact to education and training, the labour market, the economy, and to the 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	• 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	• 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	• 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	• 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	• Enhanced capacity of societies to empower disadvantaged groups
More motivated labour force	• Improved visibility and use of existing human capital
More interest in lifelong learning	• Recognised value of services, such as voluntary and unpaid work
Potential benefits at Personal level	
Psychological benefit	• Strong self-esteem, confidence, and motivation to work and learn including among those formerly discouraged
Higher individual returns to work experience	• 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

5. Overview of the Legislative, Policy 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:

Table 2: Relevant Legislation

Legislation	Reference to RPL
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.

Legislation	Reference to RPL
National Qualifications Framework Act, 2008 (Act No. 67 of 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 Credit Accumulation and Transfer.
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.
Continuing Education and Training Act, 2006 (Act No. 16 of 2006)	*Continuing Education and Training Act,* 2006 RPL is embedded in the principles such as "expansion of access to education and training to all youth and adults, especially those who have limited opportunities for structured learning, including learners with disabilities; and diversification and transformation of institutions that promote the goals and objectives of a progressive socio- economic agenda".

6. Roles and responsibilities of the stakeholders in RPL

RPL involves various stakeholders with varying roles and responsibilities as depicted in the Table below.

Table 3: Roles and responsibilities in RPL

Stakeholder		Roles and responsibilities
Government	Ministries (eg. Higher Education and Training, Public Service and Administration, etc.)	Through its Ministries and departments, Government *inter alia*: • Provides the main framework for RPL at different levels; • Drives the political agenda and determines how RPL is integrated into the education and training system; • Ensures that (the right) to RPL is integrated into the policy and legal framework, linking to education and labour market policies at macro and meso level, qualification frameworks; • Determines (in collaboration with other stakeholders) learning pathways and creates favourable conditions for life-long learning; • Determine whether the RPL system implementation is favourable (through national level institutions) or decentralised (through local institutions); and • Secures funding for RPL and establishes a sustainable funding model.
	Departments (eg. Departments of, Higher Education and Training, Public Service and Administration, etc.)	
Public Entities	SAQA	• Develop national policy and criteria; • Receive RPL data from Quality Councils for recording on the NLRD[2]; and • Co-ordinate the alignment of NQF Sub-Framework policies on RPL.
	Quality Councils (Umalusi, Council on Higher Education and Quality Council for Trades and Occupations)	• Develop and maintain an NLRD-compatible information management system; • Work with professional bodies and accredited providers to facilitate RPL; • Monitor the implementation of RPL within own NQF Sub-Frameworks; and • Collaborate with SAQA, NAMB[3], SETAs[4] and other role players to advance RPL.
Education and Training Providers	Public and/or Private (eg. TVET Colleges, Universities, Private education institutions, Assessment centres and specialist recognition centres)	Education and training providers: • Offer services such as information and RPL guidance facilitation; • Carry out assessment (validation) which can only be done by accredited providers, in relation to qualification frameworks and standards in place; provide facilitators and/or assessors, depending on the assessment methods chosen and applied; and

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[2] NLRD: National Learners' Records Database
[3] NAMB: National Artisan Moderating Body
[4] SETAs: Sector Education and Training Authorities

Stakeholder		Roles and responsibilities
		• Support and implement life-long learning measures and often also provide guidance on, or implement training for, meeting the standards.
Employers/ private sector		Depending on the system, they may • Be involved in designing ad hoc standards, when no standards exist; • Set or adjust competence frameworks within their own industry as well as internal frameworks related to RPL, eg. Human resource and training systems, including life-long learning strategies as part of their human resource management (Singh:2015)[5]; • Implement assessment for RPL, including within the industry/company; and • Oversee assessment processes, act as an assessment/validation entity (mainly for TVET, or for association, chambers). This applies predominantly in industry-based recognition models.
Professional Bodies/ Councils		• Comply with national and SAQA RPL policies; • Include an RPL route towards attainment of professional designations; • Collaborate with SAQA, Quality Councils and Service Providers to support RPL; and • Provide RPL data to the NLRD.
Trade Unions, NGOs[6] and social organisation		Trade Unions, NGOs and social partners and community organisations should be included in the design of the RPL system. They may: • Support the process of RPL in different ways through its development; • Shape the system and guard the interests of their constituencies; and • Be represented in relevant entities, such as sectoral councils for qualifications and others.
The individual	The potential applicant and main beneficiary	Undergoes the process to obtain all or parts of a qualification. Applicants: • Gather relevant information; • Apply and present the relevant evidence; and • Receive recognition of their competencies, if successful, for learning and for work by either education and training providers or by employers and/or their associations.

Adapted from International Labour Organisation, 2018

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[5] Singh, M. 2015. Global Perspectives on recognising non-formal and informal learning. Why recognition matters (Springer Open Access),
[6] Non Profit Organisations

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:

7.1.   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;
(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%.

7.2.   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.

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

Funding is a barrier to the widespread application of RPL programmes and services. Effective functioning of a system requires a policy environment that enables sustainable and equitable funding for RPL. Although the RPL Coordination Policy provides for the funding of the National Coordinating Mechanism for RPL as well as the RPL Implementation Fund, financing RPL there has not been additional funds for RPL. At present, there is no standard cost structure, as the contexts within which

RPL is undertaken may be vastly different. According to Singh (2011)[7], there are various possibilities (and combinations) in this regard:

- Individuals: participants/candidates or 'customers';
- Private sector employers;
- Organised Labour/Trade unions;
- Education institutions;
- Donors, both local and foreign; and
- Government.

8.   Purpose of this Report

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

9.   RPL Coordination Policy (2016)

Necessity and review of the RPL Coordination Policy

One of the findings of the *Implementation Evaluation of the NQF Act, 2008* is that lack of policy clarity on key issues affects the ability of NQF bodies to execute their legislative responsibilities. The evaluation recommends that in order for the implementation of the NQF Act to happen effectively, the NQF-related legislation and policies must be reviewed to simplify implementation thereof, areas of policy uncertainty must be resolved, clear goals set, and implementation planning strengthened.

The DHET has finalised the *National Plan for Post-School Education and Training* (NP-PSET) which gives effect to the vision of the White Paper. Outcome 1.3 of the NP-PSET is about the simplification of the NQF through a number of strategies such as the review of the NQF Act and NQF-related policies to simplify implementation of the NQF and eradicate contradictions.

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[7] Singh, M. 2011. Funding models for RPL. Presentation made at SAQA's National RPL Conference, Bridging and Expanding Existing Islands of Excellent Practice, 23–25 February 2011.

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 2021/22.

10. Methodology

The RPL Coordination Policy review process entailed two processes from which data was collected. These were:

(a) Obtaining written comments on the *Report on the Recommendations and Proposed Amendments to the RPL Coordination Policy* (2016)which was approved by the Director-General in March 2021 and on the RPL Coordination Policy from stakeholders such as:

- Government (Department of Science and Innovation);
- NQF Partners (SAQA and the Quality Councils);
- Universities South Africa and Universities;
- TVET Colleges; and
- Individuals.

(b) In addition, 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
- *National Plan for Post-School Education and Training* (2022).

11. Proposals for the amendment of 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, 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).

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). The purpose of the RPL coordination should be in line with existing structures and funding protocols.

Proposals:

(a) The RPL Coordination Policy should be repealed and be replaced by a 'RPL coordination framework' that allows for an implementation framework for the Quality Councils and institutions.

(b) However, the RPL Coordination Policy when it is to be amended should be enabling enough to accommodate marginalised areas in terms of achieving the transformation and redress targets of the country. For example- the indigenous space has been endorsed towards its recognition in the Indigenous Knowledge Systems (IKS) Policy (2004)- however do not find explicit expression in the RPL Policy itself.

(c) For user-friendliness, there could be one over-arching national RPL policy and criteria document, developed together by the departments, SAQA and the Quality Councils, and featuring the logos of all six entities. The general policy and criteria section of this document could be followed by guidelines sections developed by SAQA and each Quality Council (a section per entity), where all the sections of the document are aligned (SAQA).

The scope of the Policy (Paragraphs 12 – 13)

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

Proposal:

(a) Expand the scope (and include other role players) to align to the proposed RPL coordination framework.

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";

(b) Secondly, there is a need to clarify (i) the policy making role of SAQA (does it determine RPL policy, or does it make recommendations to the Minister) and (ii) the status of such policy – is SAQA determined policy binding on providers, whether they be schools, TVETs or Higher Education Institutions;

(c) 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.

For example: the one-size-fits-all approach for RPL is not feasible considering IKS specifically which promote training and educational activities that are respectful of cultural and intellectual property rights and closely integrated with the communities being served. In addition, the RPL approach for IKS should be considerate to the socio-cultural context which best advances the disciplines that needs to be recognised in the sector.

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:

Depending on the outcome of the review process, for example if the Policy is repealed and is replaced by a coordination framework, 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 TVET), 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; and

(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.

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 include other role players such as professional bodies and 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. The Policy **does not say** that RPL centres will be set up by the Minister or anyone else. The policy states that in phase 1, "*DHET must provide support, assistance and guidance to RPL centres and education and training institutions which establish RPL centres*".

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

12. Recommendations

At the consultative workshop on 19 August 2021, a survey was conducted with the participants using the online *Mentimeter survey* instrument. The following priorities need attention and are listed below as part of the recommendations:

(a) Simplify policy layering and legal clarity for RPL;

(b) Establish workable and sustainable funding for RPL - The Department in collaboration with other stakeholders 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;

(c) Work closer with employers to mainstream RPL;

(d) Consider professionalization of RPL practitioners;

(e) Decentralise RPL to allow for greater flexibility - 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;

(f) Challenge legal limitations to RPL (eg. 10% and 50%), including roles and responsibilities provided in the NQF Act, 2008;

(g) Advocacy to the citizen on the street;

(h) Centralise RPL Coordination – 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;

(i)   Explore RPL to be done digitally as well; and

(j)   Prioritise data privacy linked to RPL.