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DISCUSSION DOCUMENT ON THE HEQF REVIEW

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1. INTRODUCTION

The Higher Education Qualifications Framework was promulgated in 2007 and since then institutions of higher education have been redesigning their qualifications in accordance with the new Framework. Since 1 January 2009, all new programmes submitted to the HEQC for accreditation have been required to be compliant with the HEQF, and accordingly, in processing applications for new programmes in the candidacy phase, the HEQC has applied the provisions and parameters of the HEQF in its accreditation processes. The nascent implementation process revealed that despite the robust nature of the design of the HEQF, there were a number of areas of difficulty or contestation relating to the Framework which suggested that a review would be expedient. In response to stakeholder input, and in line with the original intention to review the Framework three years into the implementation phase as suggested by the HEQC (CHE Advice to the Minister of Education, April 2007), the CHE initiated a review process in 2010 (Communiqué 1, 12 October 2010). Submissions were called for from the higher education sector, professional bodies, stakeholders and other interested parties on various inconsistencies and problems that need to be addressed for the overall objectives of the policy to be achieved, including:

- The appropriateness of the nine qualification types, including the designated variants, in the light of different institutional missions and labour market expectations, in particular, the lack of a degree variant unique to the Universities of Technology.
- The coherence and consistency in the designation, credit value and pegging of some qualifications in the context of the needs of different professions, in particular, the lack of 240-credit diplomas, which may be required, for example, in a range of auxiliary health professions.
- The articulation pathways between undergraduate diploma and postgraduate programmes in terms of the time required to complete a Master's degree, for example, a student with an undergraduate Diploma would require two additional years of study prior to being considered for entry into a Master's programme.
- The appropriateness of a number of postgraduate qualifications in different professional fields and their international comparability such as the MMed.
- The extent to which the range of qualifications available, in particular, at levels 5 and 6 are appropriate to support the goal of expanded access.

The deadline for submissions was 10 December 2010. The Communiqué emphasised that the purpose of the review process was not to fundamentally revise the HEQF but to consider whether it is necessary to provide for new qualification types to facilitate access, and to make changes to ensure the HEQF allows for responsiveness to emerging skills and knowledge needs and to enhance the coherence of the higher education system. In this discussion document the issues raised and suggestions made have been consolidated and the CHE's response and proposals for revising the HEQF are outlined. Subsequent to the approval of the proposals by the Council, they have been discussed with representatives of public and private higher education institutions in an informal consultation process.

2. SUBMISSIONS

Twenty-three submissions were received from a range of stakeholders, including individual public and private higher education institutions, bodies representing higher education institutions and professional bodies. Overall, the submissions did not indicate that a complete reworking of the HEQF in its entirety was needed. Instead, most contributions pointed to specific omissions, inconsistencies, lack of flexibility or lack of clarity. However, there were some areas in which the concerns indicated the need for changes to the HEQF structure to alleviate the concerns or to provide for greater flexibility.

3. MAIN CONCERNS

The concerns raised in the submissions can broadly be classified into seven main issues:

3.1 Qualification pathways

It is argued in some submissions that the HEQF should explicitly acknowledge the existence of three qualification tracks in higher education, described as vocational/technical, general/academic, and professional, in order to provide for the different curricular characteristics of these tracks in terms of the relationship between conceptual and contextual knowledge.

3.2 Work-integrated learning

Some submissions argue that the presentation of work-integrated learning (WIL) in the HEQF requires deeper conceptualization in order to address issues such as whether WIL is a broader concept than workplace-based learning, and, if so, what types of opportunities should be provided for it. A more comprehensive understanding of WIL posits it as an educational approach that aligns and links theoretical academic learning with practice-based learning, and may include activities such as project-based, problem-based and work-directed learning in addition to workplace-based learning. It is also pointed out that the requirement in the HEQF that institutions are responsible for placing students in WIL programmes is often difficult to comply with, and militates against the incorporation of WIL into learning programmes.

3.3 Level 5 and 6 qualifications

There is a strong suggestion in some submissions that a 240-credit Diploma is a distinct lack in the current framework for certain professions, such as the auxiliary health professions, engineering and education. The rationale provided is that this type of qualification lends itself better to specific

career-related education leading to employment at particular levels within specific professions than two related but disparate certificates (Higher Certificate and Advanced Certificate). In a 240-credit qualification there is more room for knowledge progression, and the achievement of appropriate exit-level outcomes, than is possible in two 120-credit qualifications. Some suggestions also recommend that the 240-credit Diploma should be restricted to specific fields where there is a demonstrable need in terms of employment opportunities. There are, however, suggestions advancing both a 240-credit Diploma at Level 6 which suits such sectors as health sciences and engineering, and a 240-credit Diploma at Level 5 which better suits the health and skincare and the fitness and sports coaching industries.

There is relatively little in the submissions about the intrinsic worth of the Higher Certificate at Level 5 and the Advanced Certificate at Level 6, although strong arguments are advanced in favour of providing increased access to higher education and clear progression pathways which would suggest that despite the call for a 240-credit qualification, there is still a need for a variety of types of offering at these levels. A related issue, not directly addressed in the submissions, is whether the Higher and Advanced Certificates should be offered as part of the HEQF, or should rather be located within other parts of a reconstituted South African post-secondary system.

3.4 Clarification of the purpose and characteristics of Bachelor's Degrees

In the current description and parameters for a Bachelor's degree, there are, depending on the reading of the HEQF document, either two, three or four degree variants, that is, a 480-credit degree at Level 8 that is professionally oriented, a 360-credit Bachelor's at Level 7 that is primarily general and formative in purpose, and in some readings, a 480-credit general formative degree at Level 7 (such as the new BEd), as well as an implied 360-credit Bachelor's at Level 7 that may have a professional purpose. The last is, however, not unambiguously clear from the current description. Some submissions argue that the statement on page 23 of the HEQF that "Bachelor's Degrees exiting at level 8 are often referred to as "professional" Bachelor's Degrees" can create the impression that a Level 7 Bachelor's cannot be professionally oriented. However, the qualification descriptor for the Bachelor's degrees acknowledges that both types "enable students to demonstrate initiative and responsibility academic or professional contexts" which implies the recognition of a professionally-oriented 360-credit degree as well as a 480-credit general Bachelor's degree. In other words, a specific reading of the HEQF policy is proposed that makes provision for a 360-credit professional Bachelor's degree as well as a 480-credit general Bachelor's degree.

With respect to the recognition of a 360-credit Bachelor's Degree, one submission suggests various alternatives for the introduction of a "three-year vocationally orientated degree": i) the extension of the description of the current three-year Bachelor degree to include a professional degree; ii) the introduction of a new qualification that is specifically named to indicate this qualification by means of the adjective "Applied", as in Bachelor of Applied Science, Applied Arts or Applied Commerce, thus keeping the designators broad but indicating the more applied nature of the curriculum; or iii) through the introduction of a three-year professional degree as a variant of the current four-year professional Bachelor's degree. A caveat is suggested that only those programmes with a significant basis in principles and theory should warrant the appellation of Bachelor.

It is argued that explicit recognition of a 360-credit professional Bachelor's Degree would facilitate the construction of articulation pathways from the Diploma path to the Degree pathway and vice-versa, which is currently experienced as very difficult. It is much more difficult to articulate between a vocationally-oriented Diploma and a general formative Bachelor's Degree than from an vocationally-oriented Diploma to a professional Bachelor's degree due to the properties of the curricula that are typical of the different qualification types.

In addition to the recognition of a 360-credit professional Bachelor's Degree, clarity is requested with respect to whether the HEQF provides for a 480-credit general Bachelor's Degree.

3.5 Learning and progression pathways for vocational and professional qualifications at the undergraduate level

While the HEQF brings together formerly different higher education sectors into one framework, there are two implicit progression routes: the academic route from Bachelor's degree, Honours to Master's and Doctoral study, and the vocational/professional route from Diploma to Advanced Diploma to Postgraduate Diploma to Master's and then Doctoral studies. Effectively, the HEQF accommodates a "Degree" and "Diploma" route up till NQF level 8, with the first nexus of convergence between the routes at the Master's level. While it is possible for students to articulate into a Bachelor's degree from an undergraduate Diploma, many students will – in terms of the current provisions of the HEQF – follow the route from Diploma to Advanced Diploma to Postgraduate Diploma and then Master's and Doctoral studies. There are arguments that this is not optimal in that students who enter Master's study through the Diploma route have never had a formal research component as a requirement for a formal qualification. There are strong suggestions that there need to be clearer articulation paths and convergence between the two routes earlier, such that Diploma students' route to Master's study is better facilitated. One proposal on how better articulation might be achieved has been outlined in Section 3.4, namely the recognition of a 360-credit professional Bachelor's degree. In the main, however, proposals on better articulation possibilities for students with undergraduate Diplomas comprise three suggestions, which are not mutually exclusive:

- **Suggestion 1: A specific professional Bachelor's degree variant that serves a "top-up" for students with an undergraduate Diploma**

The major concern expressed in a number of submissions is the perceived lack of clear, unambiguous and easily navigable learning and progression pathways for students taking vocationally -oriented qualifications at the undergraduate level. In particular, reference is made to the time-consuming and arduous nature of current progression pathways for students who complete the undergraduate Diploma to a Master's degree. Accordingly, a variety of possibilities are expressed for a specific degree variant that serves a "top-up" qualification for students with undergraduate diploma qualifications:

- The view put forward in some submissions is that there be a 3+1 model in which students complete a 360-credit Diploma at Level 6, followed by a 156-credit professional Bachelor's

degree in a cognate field at Level 8 on the HEQF (96 credits at Level 8 and 60 credits at Level 7, given the current Diploma type description that includes 60 credits at Level 7). Students would articulate from the Diploma into the Professional Bachelor's variant, while the progression pathway from this degree variant would be the Master's qualification. This variant is intended to replace the current BTech degree. As the degree variant consists of 156 credits, this "Diploma plus Degree variant" route would consist of a total of 516 credits, against the current 480-credit professional degree. The difference of 36 credits lies in the Diploma students having completed up to 300 credits at levels 5 and 6, including a maximum of 120 credits at Level 5 rather than 96 as in the current 480-credit professional degree, which is necessitated by the different entrance requirements for a Diploma as opposed to a Bachelor's degree. It is also proposed that there be a pre-exit articulation pathway between the Advanced Diploma and the proposed professional Bachelor's degree variant for candidates who have achieved the minimum requirements for the Advanced Diploma.

- A variation of the notion of a diploma/degree combination is that there should be a 120-credit professional Bachelor's degree at Level 7 to follow on a cognate Diploma in order for Diploma students to attain the "degree" appellation. An example given is a Diploma in Fashion leading to a Bachelor in Fashion. Given its different level, this degree would not be the same as an Honours degree, nor would it be intended to replace the Advanced Diploma as this is seen to have a different purpose. It is argued that the combination of the Diploma and the 120-credit Level 7 degree would give the student 180 credits at Level 7 which should prepare the student for the Postgraduate Diploma at Level 8. It is important to note that the professional Bachelor's degree variant at NQF level 7 is different from the 360-credit professional Bachelor's degree discussed in Section 3.2.1. While the 360-credit professional Bachelor's degree is designed as a complete qualification, the 120-credit "top-up" professional Bachelor's degree variant builds explicitly on the Diploma, and therefore is curriculated as an extension of the Diploma.
- A further suggestion is made: that there be a 480-credit professionally-oriented degree at Level 7 with the same admission requirements as the 360-credit Diploma.

In most of these suggestions, caution is expressed about the use of the designator "Technology" and the need is indicated for such new qualifications (in whichever version) to be distinguished from the current BTech, MTech and DTech qualifications.

- **Suggestion 2: Reconsideration of the nature, purpose and articulation pathways from the Advanced Diploma:**

The Advanced Diploma is not designed primarily as a progression route from Diploma to postgraduate study but rather has as its main purpose specialisation in a specific area which is particularly suitable for continuing professional development, or for career-focused preparation for students with Bachelor's degrees. It is proposed that the Advanced Diploma be reconceptualised to have a dual function, that is, as is currently described in the HEQF and secondly as a "specially curriculated articulation pathway" into an Honours degree – which the HEQF does not currently allow for, or a Postgraduate Diploma – which the HEQF does allow for. Diploma students would then

after four years of study enter into an Honours degree or a Postgraduate Diploma. With respect to articulation into an Honours Degree, it is pointed out that the current logic of the progression route beyond the Advanced Diploma displays internal incoherence: with 120 credits at Level 7 in addition to the 60 Level 7 credits included in a Diploma, it is not clear why the Advanced Diploma should not give access to an Honours degree at Level 8. Students should therefore be able to articulate from an Advanced Diploma into either an Honours degree or a Postgraduate Diploma. (It is also evident that the current HEQF contains an inconsistency with respect to the Advanced Diploma. In the qualification descriptor for the Advanced Diploma the Postgraduate Diploma is a progression option, yet the Advanced Diploma is omitted as meeting the minimum entry requirements for a Postgraduate Diploma in the descriptor for this qualification. This appears to be an error that needs to be corrected).

- **Suggestion 3: Permitting direct articulation from the Diploma at Level 6 to the Postgraduate Diploma at Level 8 under specific circumstances.**

In this proposal, it is envisaged that Diploma students would require on completion an additional 36 credits at Level 7, depending on the field of study (assuming the 60 credits at Level 7 in the Diploma) for progression to a Postgraduate Diploma which has a total of 156 credits (the current 120 at Level 8, plus 36 credits at Level 7). This proposal effectively bypasses the Advanced Diploma, and implies a progression pathway of Diploma (Level 6) to Postgraduate Diploma (Level 8) to Master's (Level 9), with 60 credits at Level 7 included in the Diploma and 36 credits at Level 7 in the Postgraduate Diploma as a bridging device. The additional 36 credits in the Postgraduate Diploma are envisaged to equip students with advanced vocational training commensurate with the knowledge and skills of working professionals. The argument for 96 credits at NQF level 7 is supported by the analogy of the 480-credit Bachelor's degree which requires 96 credits at NQF level to serve as preparation for entry into a master's degree at NQF level 9.

Other views in relation to the articulation pathways between undergraduate diploma programmes and postgraduate programmes include the following:

- That students in a Diploma track take two extra years of study to reach a Master's degree and those with undergraduate degrees require one year is seen to be justified in terms of the "trade-offs" involved. It is argued that students in the diploma track achieve employment credentials sooner than those in the academic and professional degree tracks who can only achieve employment credentials after four years of study and specialisation at Honours level. In this view there needs to be a clear distinction between vocational (postgraduate diploma) and knowledge-based (honours) programmes.
- On the matter of the progression routes from Diploma studies to postgraduate studies it is advanced that owing to lower admission requirements, Diploma students are often not ready to embark on postgraduate studies after three years and need an additional year to prepare. A concern is advanced that by "eliminating the level 7 link between the current Diploma on level 6 and the postgraduate qualification on level 8", the goal of access with success may be jeopardised.

3.5 Principles for the design of the CAT scheme

There is an implicit understanding in some submissions that accumulating credits at a particular NQF level may amount to sufficient credits to assure progression, in other words, a view that all credits at a particular level are equivalent. This view is evident particularly from proposals relating to Bachelor degree variants as a “top-up” from the Diploma, but also proposals that the 240-credit Diploma should allow for admission to the third year of a Bachelor’s degree. However, the majority view is that the purpose of a qualification, in terms of its knowledge properties, learning outcomes and graduate profile is the primary determinant of articulation possibilities and therefore of the currency of credit values in terms of the requirements of different qualification types at different levels within the HEQF. In the latter interpretation, the credits from a particular qualification at a certain level are not necessarily equivalent to the credits from another qualification at the same level. Thus, while credits form a common currency between qualifications, “the exchange value” is determined by the purpose of the qualification rather than the NQF level alone.

Precisely because articulation possibilities between qualifications should be determined on the basis of the purpose and curricular characteristics of qualifications, some submissions call for urgent attention to the development of a CAT scheme. They point out that some qualifications are inherently nested, so that while the 50% credit transfer rule may be appropriate for “opportunistic” transfers, it is not appropriate where approved progression pathways are developed between qualifications with a high degree of commonality and where such pathways are approved or accredited by, for instance, a professional body.

There is also a call in some submissions for flexible exit points between qualifications, based on the argument that learners should be allowed to exit with a qualification at a lower NQF level if they meet the learning outcomes of that qualification. A further argument is that qualification frameworks such as the Scottish unified post-compulsory system allows for flexible points, so that if the HEQF wishes to be internationally comparable it should also provide for flexible exit points. However, other submissions argue against early exit points as this might jeopardise the design of curricula as an integrated set of learning components.

3.6 Level 9 qualifications

Continuing the theme of a lack of clarity with respect to progression pathways in the professional track, there is a strong call for a more flexible range of qualification types at Level 9 in addition to the pure research Master’s and the coursework Master’s that includes a research component in the current version of the HEQF. The current configuration is considered too restrictive and not sufficiently accommodating of the needs of graduates who wish to further their professional development.

The suggestions for further qualification types at Level 9 include the following:

- A coursework-only qualification taught at the Master's level that focuses on specialised areas of knowledge development, i.e. a Postgraduate Diploma of 180 credits at Level 9 to facilitate articulation and encourage lifelong learning at the postgraduate level, particularly in the professional disciplines.
- A professional or "career-specific" Master's degree at Level 9 with a lesser research component than the current 60 credits (36 credits, not constrained to the form of a unitary dissertation, is suggested in some versions), or in which the research component is replaced by a technical report where the focus is more on advanced clinical training and professional practice. Such qualifications would most often be designed in consultation with a professional body or recognised by such a body as a requirement for a licence to practice in the relevant profession. The arguments for the inclusion of this qualification type include the need for skilled professionals to work with researchers and vice-versa, the more appropriate nature of course-work and smaller research projects to develop such competencies, global trends in this direction, and the need for a qualification that specifically targets the integration of scientific knowledge based on research with professional practice. Currently, while there is a need for advanced development of professional knowledge and skills, the dissertation requirement is seen to constitute "a relatively insuperable barrier" for the majority of professionals who are already employed are seeking specialist knowledge but have no intention of becoming active researchers, and this in turn has negative implications in terms of either not recruiting students into Master's study, or high dropout rates from students who complete the coursework but not the dissertation.
- In addition, the HEQF currently does not cater for Master's level training requirements in certain professions, particularly in the Health Sciences (Medicine, Chiropractic, Homeopathy), where a specific type of Master's degree is required for registration as a professional, that has a total of far in excess of 180 credits consisting of a combination of academic and clinical training across that are spread across different years of study.

4. OTHER AREAS OF CONCERN

There were a range of other concerns raised, which with one exception – that relating to doctoral qualifications, are not fundamental to the structure and coherence of the HEQF:

4.1 Doctoral qualifications

The concerns relating to a perceived lack of a sufficient range of qualification types at Level 9 is echoed in concerns about the Doctoral level qualification. The HEQF, does not clearly articulate the differences between PhDs and other doctoral level qualifications, nor provide for the possibility of senior doctorates or doctorates with a professional orientation.

4.2 Master of Business Administration (MBA)

There are some types of qualifications such as the MBA that cannot be easily accommodated in the HEQF as the latter strives for simplicity and clarity. The MBA, it is argued, is a specific kind of

qualification not easily configured into the current Master's parameters on three counts: its orientation, the lack of the research component which is not seen as appropriate to achieve the purpose of this qualification, and its different admissions requirement in that most existing MBAs do not require an Honours or a postgraduate diploma as an entrance requirement, which is the minimum requirement for entry into level 9 qualification types. However, a few submissions argue that this is not relevant as stringent requirements relating to work experience and the use selection tests make up for the lower formal admission requirements. A solution proposed in this regard in one submission is the provision for a professional Master's degree on the HEQF, and that the MBA should be recognised as such. However, and in contrast, a separate report on the MBA programme that was included with the same submission suggests that Business Schools should conform to the full requirements of the HEQF for Master's degrees if they wish to receive Master's subsidy.

4.3 Bachelor of Education (B.Ed)

The BEd as outlined in the *Policy on the Minimum Requirements for Teacher Education Qualifications selected from the Higher Education Qualifications Framework (HEQF)* is a further anomaly in that it is proposed as a Level 7 general formative degree in a professional area but with 480 credits. This is consistent with the current HEQF but the concern is that in equivalent areas such qualifications may be pegged at Level 8, resulting in disparities between this field and other related ones. However, one submission acknowledges that because the BEd requires at least 120 credits of teaching practice, an Honours Degree is unavoidable as a preparatory programme for the Master's degree. The submission also refers to the possibility of reconfiguring the BEd so that it does include sufficient material at NQF level 8 to prepare for Master's study. The resolution of this matter is the responsibility of the stakeholders in the teacher education sector and does not require any revision to the HEQF. With respect to Education qualifications there was a request to reconsider the absence of a postgraduate certificate as the Postgraduate Certificate in Education (PGCE) is an internationally recognised nomenclature. This proposal entails retaining the name "PGCE" instead of the name "Advanced Diploma in Teaching ", as indicated in the draft policy on the new teacher education framework, with the qualification being pegged at NQF level 7 – despite its being a postgraduate certificate.

4.4 Bachelor of Medicine/Bachelor of Surgery (MBChB)

Although not an issue in the submissions, the MBChB as an undergraduate degree requiring 5 or 6 years of study is another anomaly that does not easily map onto the type specifications for degrees of the current HEQF.

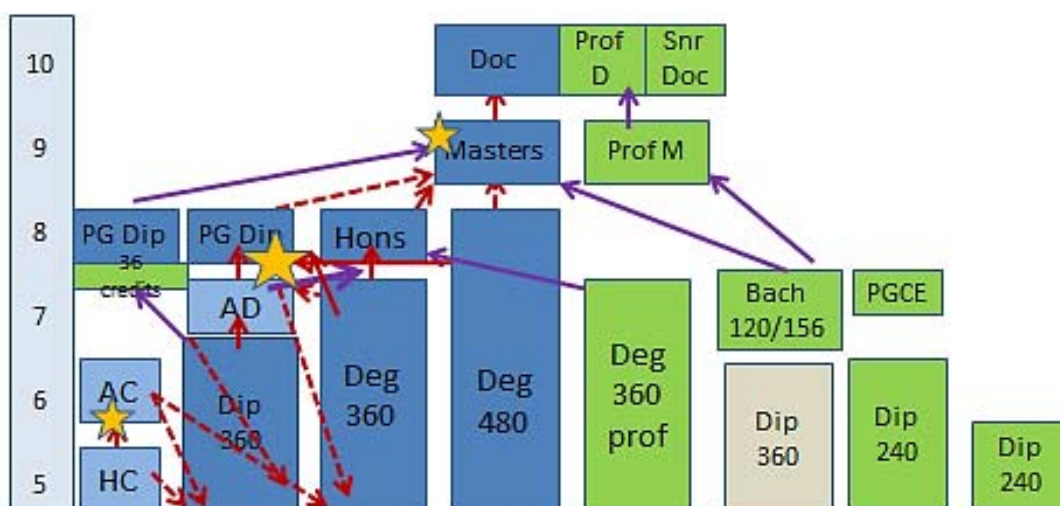
4.5 Four-year undergraduate degrees

A concern was raised about the potential introduction of an extended undergraduate degree of four years' duration as the norm as opposed to the current three-year undergraduate degree and how this might affect the framework. However, views were also expressed that this would not affect the type specification of a degree as it is defined in terms of credits and levels, rather than duration of study – essentially the extended degree is the same qualification type, but completed more slowly.

4.6 Credits

It was suggested in a number of submissions that an over-specification of credits within particular qualifications should be steered away from, and that the specification of some current credit minima/maxima, such as the maximum of 96 credits at Level 5 in a degree, appears to be arbitrary. Some submissions also criticise the fact that the HEQF makes no reference to the design of extended diplomas and degrees and their credit values.

5. PICTORIAL REPRESENTATION OF CONCERNS



6. THE CHE'S RESPONSE AND PROPOSED CHANGES

Given the above outline of concerns expressed in the submissions, it is evident that the HEQF is in general considered to be coherent and workable, and that it does not need complete reworking. However, there are particular problems experienced in the framework that converge in the seven issues presented above. These issues entail that, apart from revisions to the qualification ladder itself, some other areas covered in the HEQF document, such as the framework for standards setting and the notion of work-integrated learning (WIL), are found to be in need of clearer conceptualisation. The relationship of the HEQF to the funding framework for higher education qualifications needs to cohere more, and clarity on the funding of certain activities such as WIL needs to be achieved. There are expressed needs for a clearer articulation of aspects relating to volume and credits such as which activities constitute contact time, for an expansion on the proposed system of credit accumulation and transfer, how the articulation between the old

frameworks and the HEQF will occur and how progression across the frameworks will be managed. There is a suggestion also for the need to specify in more detail the information required on a transcript supplement, as well as to expand and clarify the admissions requirements, particularly in terms of alternative possibilities for expanded access.

6.1 Conceptual framework

In general, the conceptual framework underpinning the HEQF and its original goals are not in question. Many of the submissions express support for the goals and intentions of the HEQF within the NQF, including the bringing together of education and training and formerly different sectors on one framework. However, some views suggest that the concern to produce an integrated framework has led to a lack of clarity on different qualification pathways and progression tracks which should be properly developed and made more visible to ensure the realisation of the principles of the NQF, namely, the vocational/technical track, the general/academic track and the professional track. Other submissions assume two broad tracks: the academic and the professional, but the point remains. Furthermore, while certain intentions and principles have become embedded in the language around qualifications and programmes, there is a need to reiterate and clarify them and bring them to the fore.

6.2 Assumptions

In this sense then, certain assumptions need to be made more visible in the HEQF document. These include:

- An expression of the different qualification routes that are encompassed in the HEQF with an accompanying principle that particular types of qualifications are not necessarily limited to particular types of institution, and that the routes are permeable
- There appears to be an assumption that credits at the same level are equivalent and exchangeable. The assumption that the purpose of the qualification is the primary determinant of value, and that, while credits provide a currency for articulation purposes, not all credits at a particular level are equal and interchangeable, needs to be foregrounded. Credits from a programme designed with a specifically academic purpose on Level 6 for instance, are not necessarily the same as Level 6 credits in an Advanced Certificate which is designed for a more vocational purpose.
- The assumption of 1 credit equalling ten notional study hours appears to be well-accepted and embedded. Less well shared is a common understanding of how such credits are calculated, which activities are included in such notional hours, or that notional hours are to be understood as the total learning time from the average student's perspective. Also not always well understood is the relationship of credits to real time, although this is articulated in the current HEQF (pp 8-9). This needs to be better clarified.
- The fact that different levels of the Framework imply different levels of cognitive complexity related to level descriptors as well as qualification purpose needs to be reiterated.

7. THE CHE'S PROPOSED CHANGES TO THE FRAMEWORK IN RELATION TO CONCERNS

7.1 Standards Development

The CHE recognises the call to provide a clearer delineation of the qualification pathways and progression routes within the HEQF, but is concerned that delineating them too sharply may be counter-productive. While some of the submissions refer to three tracks in the form of a vocational/technical, professional and general / academic track, it is recommended that the terminology used is also reflected in the CHE's approach to standards setting which is still in the development phase. The specification of the qualification routes should be integrated into the section of the HEQF that deals with standards development in higher education.

Proposal 1: The CHE proposes that the HEQF should reflect the approach to standards development in higher education and vice versa, and should include the recognition of three broad qualification progression routes, namely the vocational, professional and general routes, each with slightly differing characteristics in terms of its relationship to the labour market, knowledge mix and skills requirements in the qualification types that typically are associated with it. While the routes should be reasonably clear, the CHE advocates permeable boundaries between them.

7.2 Work-Integrated Learning

The submissions raise valid concerns about the need for a clearer conceptualisation of work-integrated learning. The current formulation of the HEQF focuses on only one form of work-integrated learning, namely workplace-based learning, and does not acknowledge other possible forms. Drawing on the resource document on work-integrated learning that is being developed for the CHE, it is proposed that the HEQF defines work-integrated learning as including work-directed theoretical learning, problem-based learning, project-based learning, simulated learning and workplace learning. The broader definition of work-integrated learning allows more possibilities for its alignment with the characteristics of different qualification types and the purposes of different programmes.

Proposal 2: The CHE proposes that the HEQF should provide for various forms of work-integrated learning including work-directed theoretical learning, problem-based learning, project-based learning, simulated learning, service learning and workplace-based learning.

7.3 Qualifications at Levels 5 and 6

7.3.1 Higher Certificate and Advanced Certificate

Currently the HEQF makes provision for a Higher Certificate at Level 5 as an entry-level qualification which is primarily vocational or industry-oriented. The Higher Certificate meets the entry requirements into an Advanced Certificate and a cognate Diploma. The HEQF also has an Advanced Certificate at Level 6 which is similarly vocational in purpose, which follows on from the Higher Certificate. The Advanced Certificate meets the entry requirements into a cognate Diploma or Bachelor's degree programme. The CHE's concerns with respect to these qualifications are fourfold:

- While the Advanced Certificate meets the entry requirements into Diploma or Degree studies, it is very largely a terminal qualification without direct access to a qualification above it.
- The argument for an integrated 240-credit qualification in the form of a Diploma is considered to be sound and to be particularly relevant for certain professions such as the auxiliary health professions, Engineering and Education.
- The Higher Certificate does not meet the entry requirements for Degree studies.
- The largely vocational nature of these two qualifications begs the question whether they are best placed in the higher education framework or whether they would not be better suited in the occupational sector or the further education sector.

However, it is acknowledged that the resolution of the last point must form part of the design of the South African post-secondary system and decisions about the qualification types that should be presented by the different sub-systems within it. Until this matter has been resolved it is proposed that the Higher Certificate and Advanced Certificate remain on the HEQF, but that particular attention should be paid to the plausibility of assigning these qualification types to different sub-systems within a re-designed post-secondary system. The CHE should be mandated not only to suggest new qualification types as is currently the case, but to suggest the relocation of any existing qualification to another qualifications sub-framework.

Proposal 3: The CHE proposes that the Higher Certificate at Level 5 and the Advanced Certificate at Level 6 should remain on the HEQF.

7.3.2 240-credit Diploma at NQF level 6 with a vocational orientation and a professional designation

Given the argument above, the CHE believes there is space in the HEQF for a 240-credit qualification at Level 6, which falls within the vocational progression route and which leads to a particular vocational role and professional designation in specific fields: the auxiliary health and allied health fields, engineering and education. As argued in some of the submissions, a 240-credit Diploma allows for a more coherently designed learning programme than the combination of the Higher and Advanced Certificate. This qualification would be an alternative to a 360-credit Diploma: institutions would need to choose which they would offer – in effect, it is a variant of the 360-credit Diploma. While there are concerns about nomenclature and that calling such a qualification a Diploma might

cause confusion with the 360-credit Diploma, the same model that sees a 480-credit degree and a 360-credit degree both as Bachelor's degrees would apply.

The CHE supports the submissions that argue for a 240-credit Diploma with an exit at NQF level 6 rather than the alternative proposal that the qualification's exit level should be at NQF level 5. A level 6 qualification provides more opportunity for progression in terms of the theoretical and procedural knowledge and skills that students develop and will address education and training needs in various employment sectors.

An issue that needs attention is the progression opportunities from a completed 240-credit Diploma. Further work needs to be done on this matter. A possible approach is to require that students who wish to progress from a 240-credit diploma to an Advanced Diploma should complete an approved (and accredited) 120-credit learning component, either in the form of work-integrated learning alone or a combination of work-integrated learning and coursework. Students will also be able to articulate from a 240-credit Diploma into a Bachelor's Degree.

Proposal 4: The CHE proposes the introduction of a 240-credit Diploma at Level 6 as a variant of the 360-credit Diploma, which leads to a professional designation.

7.4 Clarification of the Purpose and Characteristics of Bachelor's Degrees

Given the concern relating to the different interpretations of which variants of a Bachelor's degree are possible, and the need for more professionally-oriented qualifications and pathways, it is proposed that the HEQF allows for a 360-credit Bachelor's degree with a professional orientation which conforms to all the other type specifications of a Bachelor's degree. The concern is that such a degree offering might influence institutions to offer this qualification type in lieu of the 360-credit Diploma with undesirable consequences for access in the system, given the different admissions requirements of these qualifications. However, various 360-credit Bachelor's degrees already have the properties of a professional degree – a matter that is acknowledged by the revision of the HEMIS classification system to include 3 year professional Bachelor's Degree since 2007. There are various examples of 360-credit professional Bachelor's degrees in professions such as Architecture, Accounting and Law. Thus, it is apparent that certain professional fields do not lend themselves to a 480-credit professional degree.

Furthermore, as stated in Section 3 above, explicit recognition of a 360-credit professional Bachelor's degree would facilitate the construction of articulation pathways from the Diploma pathway to the Degree pathway and vice versa which is currently experienced as very difficult. It is much more difficult to articulate between a vocationally-oriented Diploma and a general Bachelor's Degree than from a vocationally-oriented Diploma to a professional Bachelor's degree owing to the properties of the curricula that are typical of the different qualification routes.

In addition to the specific case of the 360-credit professional Bachelor's Degree, the CHE recommends that the description of the purpose and characteristics of Bachelor's Degrees in the HEQF should allow for the possibility that both the 360- and 480-credit Bachelor's Degree may be either a professional or general degree. A 480-credit Bachelor's degree need not necessarily have a

professional orientation, and in common with the practice in some other countries such as the UK may integrate the Honours component into it.

Proposal 5: The CHE proposes that the type specification for the Bachelor's Degree be amended to make it explicit that a 360-credit Bachelor's degree at Level 7 is a variant of the Bachelor's degree.

Proposal 6: The CHE proposes that the purpose and characteristics for the Bachelor's Degree should recognise that both the 360- and 480-credit Bachelor's Degree may have a professional or general orientation.

7.5 Learning and Progression Pathways for Vocational Qualifications at the Undergraduate Level

7.5.1 Advanced Diploma: Purpose and characteristics

Given the concerns expressed about learning and progression pathways for vocational and professional qualifications, the CHE recommends that the purpose and characteristics of the Advanced Diploma at Level 7 should be reconceptualised to have a dual role: not only to enhance continuing professional development, but to prepare students for further study at the postgraduate level. While the HEQF currently allows for progression from the Advanced Diploma to a Postgraduate Diploma, the current description of this qualification focuses more on continuing professional development and/or specialisation in a particular area. It is proposed that the description of the Advanced Diploma be revised so that it explicitly includes preparation for postgraduate study.

Furthermore, the CHE recommends that the Advanced Diploma allows for progression to either a Postgraduate Diploma or to an Honours Degree. The current limitation of progression from an Advanced Diploma to a Postgraduate Diploma in the HEQF means that students who follow the Diploma route may enter a Master's Degree without ever following a programme with a research component. Allowing students to progress from an Advanced Diploma to a Bachelor Honour's Degree provides them with a better opportunity to prepare adequately for the research demands of a Master's Degree.

Proposal 7: The CHE proposes that the purpose and characteristics of the Advanced Diploma be expanded to include preparation for further study and that the Advanced Diploma at Level 7 articulate into an appropriate and cognate Honours degree at Level 8 as well as into the Postgraduate Diploma at Level 8.

7.5.2 Proposals for a Bachelor's Degree variant as a "top-up" qualification from the Undergraduate Diploma – Not Recommended

As noted in Section 3.5, there is a proposal that a specific Bachelor's Degree variant be introduced onto the HEQF in order to provide for articulation for students who complete an 360-credit undergraduate Diploma. The proposals are either a 156-credit Bachelor's Degree variant at NQF level 8 or a 120-credit Bachelor's Degree variant at NQF level 7. The CHE recommends that neither of these proposals be accepted, as Bachelor's Degrees should be designed as complete qualifications with a systematic and progressive development of knowledge and skills, and not as top-up qualifications that build on a Diploma. Although generalisations should be avoided, a Bachelor's degree – whether professional or general – has a different type of curriculum than a Diploma. As the HEQF document indicates the Bachelor's degree has a stronger focus on theoretical understanding and mastery of general principles than a Diploma which is oriented more towards the development of procedural knowledge in conjunction with a more delimited range of general principles.

Additionally, this proposal relies on the argument that students will already complete 60 credits at NQF level 7 as part of the requirements for the Diploma, but the CHE's recommendation is that this requirement should fall away in the revised HEQF.

7.5.3 Proposal for direct progression from an undergraduate Diploma to a Postgraduate Diploma – Not Recommended

The CHE does not support the proposal that students who complete a 360-credit Diploma at NQF level 6 should articulate into a 156-credit Postgraduate Diploma at NQF level 8. This proposal relies partly on the argument that students will already complete 60 credits at NQF level 7 as part of the requirements for the Diploma, but the CHE's recommendation is that this requirement falls away in the revised HEQF. Furthermore, the proposed revision to the purpose and characteristics of the Advanced Diploma entails that it will serve as a discrete qualification that prepares students who follow the Diploma route for the demands of postgraduate study. Students who complete the undergraduate Diploma need a full 120 credits at NQF level 7 to prepare for further study.

7.6 Principles for the Design of the CAT Scheme

The HEQF document indicates that the Ministry of Higher and Education will undertake systematic work on the development of a national higher education CAT scheme in collaboration with the higher education community, the CHE and SAQA. It is recommended that the further education and occupational sectors be included in this work to ensure that appropriate articulation pathways are developed within the post-secondary system, and also that consideration be given to whether articulation pathways can be developed between the qualifications that are accredited by the CHE and by other QCs.

The development of an appropriate CAT scheme is important, as principles need to be developed for articulation between qualification types on the HEQF. While such principles apply to articulation at all levels of the HEQF, there is a need to address the concerns with respect to the progression possibilities in the “diploma route” through the development of principles for articulation from undergraduate diplomas to Bachelor’s Degrees.

7.7 Qualifications at NQF Levels 9 and 10

The Master’s degree is currently conceptualised to include 2 variants, namely a research Master’s, as well a Master’s by coursework with a dissertation of 60 credits. The CHE supports the call in a large number of the submissions for the recognition of a third variant, focusing on professional development, that would comprise coursework and at least 36 credits of research work that may take various forms such as research papers, professional outputs such as a technical report and creative outputs such as a composition or public performance and that may be undertaken as a series of smaller projects or as a single project.

Proposal 8: The CHE proposes the introduction of a professional Master’s degree as a separate qualification type to the general Master’s in its current two variants, that is, coursework and full dissertation. The professional Master’s would have its own type specification, that is, purpose, characteristics and requirements.

In addition to the recognition of professional Master’s degrees in the HEQF, it is also recommended that the HEQF should recognise the professional doctorate as a specific variant of the doctorate. Professional doctorates have become increasingly prominent in countries such as the UK, Ireland and Australia since 1990, while they have been part of the system in the USA for appreciably longer. The 2010 Assaf Report provides an outline of the international debate relating to the professional doctorate, and one of its recommendations (Recommendation 9) is that the South African HE system should:

Recognise and reward the diversity of doctoral programmes in practice, and adapt national policy to these realities rather than impose a one-size-fits-all model of the traditional PhD on a system that has long moved in the direction of multiple models of training for the doctorate in traditional academic as well as professional degrees (ASSAF 2010: 112).

Elsewhere the report argues that the single model PhD will not be capable of addressing the high level education and training needs of the South African economy and society, and that there may be a need for at least two types of doctorates, one to prepare students for an academic career and one to prepare students for a career in industry and the professions (Assaf 2010: 42).

It may also be noted that the Quality Assurance Agency in the UK, has recently published two consultative documents on the characteristics of the professional master’s degree (2009) and the characteristics of the doctoral degree (2011). In the latter document, professional and practice-based doctorates are discussed as a specific category of doctorates. The Higher Education Qualification Frameworks in England, Wales and Northern Ireland, Scotland, Australia all distinguish

between and provide for professional Master's and doctoral degrees alongside other types of qualifications at these levels.

Should a professional doctorate be recognised, the CHE recommends that it should require a research component in the form of a thesis, or another form of research that is commensurate with the characteristics of the discipline or field of study, worth at least 180 credits. A matter that will require attention is the designator for a professional doctorate. It is recommended that the title "PhD" should be reserved for the doctorate by research only, in order to clearly distinguish between the two types of qualifications. Internationally there is considerable variation with respect to the designation of professional doctorates. Use is made of the title DProf (Professional Doctorate), as well as the name "Doctor" followed by the area of study – e.g. Doctor of Commerce (DCom), Doctor of Engineering (DEng). The difficulty is that designations such as "DCom" and "DEng" are also currently used for doctorates by research only.

Proposal 9: The CHE proposes the introduction of a professional doctoral degree in addition to the research doctorate.

7.8 Credit Requirements in the Qualification Type Specifications

A few submissions argue that the specification of a maximum of 96 credits at NQF level for a Bachelor's Degree and 60 credits at NQF level 7 for a 360-credit Diploma is not appropriate. With respect to the Bachelor's Degree, the challenges that the South African education system faces in terms of the transition from the secondary to tertiary education suggest that students should be allowed to take a full 120 credits at NQF level 5 in order to develop the fundamental knowledge and competencies to be able to progress to more complex knowledge constructs. With respect to the Diploma, students take up to 120 credits of work-integrated learning as part of their programmes, so that the formal academic coursework component may consist of only two years of full-time study. In such cases, students would typically complete 120 credits at NQF level 5 in their first year and 120 credits at NQF level 6 in their second year. The work-integrated learning component, which is usually taken during the third year, would not progress beyond NQF level 6. Furthermore, the volume of learning in a qualification is not necessarily linked to higher NQF levels – in other words, Diplomas may allocate in excess of 120 of credits to NQF level 6 learning components in the form of formal academic coursework of work-integrated learning so that they can provide students adequately for the demands of specific careers.

The CHE recommends that the HEQF specifies the minimum total credits for each qualification type, as well as the minimum credits at the exit level of the qualification, but does not specify the maximum credits at levels below the exit level.

Proposal 10: The CHE proposes that the HEQF specifies the minimum total credits for each qualification type, as well as the minimum credits at the exit level of the qualification, but does not specify the maximum credits at levels below the exit level.

PICTORIAL REPRESENTATION OF CHE'S CHANGES

