

Chapter 1:

Making a start: An audit of current practice

Introduction

In the SAQA RPL policy, it is suggested that implementers of RPL utilise the core criteria in Chapter 2 of the SAQA RPL policy as a self-audit tool to measure their progress against agreed-upon implementation targets. This assumes that the implementer already has a process in place and that the criteria could be expanded to assess such a process. However, this does not address the very necessary pre-planning process, nor the research required for a sustainable RPL system.

Purpose of this chapter

The SAQA RPL policy provides the core criteria for a holistic and developmental model of RPL implementation. An audit of current practice must explore such practices with these criteria in mind in order to determine which steps need to be taken to move (developmentally) closer to a holistic model. An audit of current practice should also generate information and stimulate reflection, which will be fed into the processes of strategic planning for future improvement. In addition, the audit could provide useful baseline information for RPL evaluation and research.

Chapter 1 of this guideline document will therefore in addition to the self-audit tools suggested in Chapter 2 of the SAQA RPL policy, address those issues that will have an impact on the feasibility of the implementation of RPL processes and assessment.

These issues include an investigation into:

- access and admission directives from relevant authorities;
- current regulations with regard to entry into Higher Education and the extent to which there may be dissonance between RPL principles and such regulations;
- current regulations with regard to the awarding of credits towards qualifications and the extent to which these impact on the principles of RPL; and
- administrative systems geared to accommodate credit transfers as they relate to subjects or modules, and not to the awarding of credits towards outcomes.

In addition, Chapter 1 will also address:

- funding, and the sources of funding;
- costing, and comparative studies;
- curriculum development; and
- regional collaboration possibilities.

The following barriers to implementation have also been identified and will be discussed to help pre-empt unnecessary difficulties:

- the perceived lack of reformatted qualifications, i.e. qualifications developed in accordance with outcomes-based-education principles;
- delays in the registration of competent assessors; and
- delays in the accreditation of education and training providers.

1.1 Access and admission

Looking at **current practices** in terms of **access and admission** to learning programmes is an important point of departure for would-be implementers of RPL. Many institutional practices have emanated from the deeply entrenched view that only an elite few may have access to education and training, particularly in higher education. This points to a clear dissonance between RPL principles as expressed in the SAQA RPL Policy and the access and admission requirements for entry into learning programmes. In a study done by Helen Peters at the University of Cape Town (June 2000), the following obstacles to RPL in terms of admission and access were identified:

- Recruitment of students is almost exclusively focused on school leavers with matriculation exemption.
- Students over the age of 23 may apply for mature-age exemption, but this is done at faculty level and is not part of general admission procedures.
- Students without the option of mature-age exemption, (i.e. learners who have perhaps only completed grade 11/standard 9 (or lower)) currently have no means of admission to suitable programmes by means of proof of equivalent learning through experience.
- Should a learner be admitted without the minimum requirements, such a learner is not eligible for access to any bachelor's degree programme unless he/she has passed at least four subjects at the Senior Certificate level. Also, under present national legislation, a learner is not eligible to be awarded a degree even when the learner has completed the programme of study successfully. At the most, a 'certificate' may be awarded.

The definition of RPL, as defined in the National Standards Bodies Regulations (No. 18787 of 28 March 1998) clearly indicates that a dissonance between policy and current practice exists. The definition is as follows:

Recognition of prior learning means the comparison of the previous learning and experience of a learner howsoever obtained against the learning outcomes required for a specified qualification, and the acceptance for purposes of qualification of that which meets the requirements.

This means that regardless of where and how a person achieved the learning, if such learning meets the requirements of a qualification (or part thereof), it could be recognised for credits. In the context of **access and admission policies** and procedures, this may mean that using matriculation with endorsement/exemption, as an example, as an entry requirement into higher education programmes, may become only a guideline and not the definitive reason for

refusal of admission to a programme. The draft New Academic Policy (CHE¹, 2001: 96-97) makes mention of the “Senate Discretionary Conditional Exemption”, which is increasingly being used to admit non-traditional students. It states that a certificate of conditional exemption may be granted “to a person who, in the opinion of the senate of a university, has demonstrated, in a selection process appointed by the senate, that he or she is suitable for admission to a bachelor’s degree studies”. This could be viewed as a form of recognising prior learning, but it still requires a National Senior Certificate at the least.

RPL suggests that where a candidate can provide evidence of **sufficient and current learning** as associated with matriculation-level learning, a provider could (to continue with the higher education example) grant access or credits to such a learner on the basis of the evidence².

The admission requirements are usually expressed in the form of “entry requirements” or in the “new-speak” – “learning assumed to be in place”. It is important to note **that this does not mean that there should not be entry requirements, but rather that the entry requirements** should allow for non-formal and informal sources of learning and not only for formally certificated learning.

In this regard, Peters (2000: 17) suggests that **“the importance of recognizing ‘equivalence’** rather than an exact match between experience and academic learning” is becoming more prominent, but that how to assess learning from experience and how to identify what forms of knowledge can be considered relevant and equivalent to knowledge contained in entry-requirement qualifications requires that agreed-upon criteria, policies and procedures are put in place. In this regard, the Education White Paper (1997) strongly supports “the development of criteria and mechanisms to recognise prior learning with a view to admitting non-traditional students to higher education institutions”. A thorough investigation into how such practices may be undertaken must be done and the appropriate changes to access and admission policies must be addressed. If not, learners accessing education and training via RPL will remain on the periphery of the system. Also, the RPL principle that a learner can “in part or wholly” achieve a qualification through RPL – whereby a candidate is credited for the (part) qualification already achieved – must be factored into organisational policies. Clearly, well-established criteria for determining whether a candidate does meet all (or part) of the qualification for the attainment of credits, including the requisite academic skills needed for study at a particular institution, must be

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- 1 (draft) A New Academic Policy for Programmes and Qualifications in Higher Education has not been finalised. However, the "Senate Discretionary Conditional Exemption" is already in use and supported by the Matriculation Board as an alternative route to access higher education without the minimum statutory requirements of a "matriculation with endorsement" status.
 - 2 This is by no means true for progression between further education and higher education only – it relates to the movement between general and further education and training (FET), as well as between the levels in higher education. However, a matriculation certificate could be considered a ‘high-stakes’ qualification since so many structures are in place to regulate the movement between FET and higher education and training (HET). The irony is that many learners have accessed and completed higher education programmes without having completed matric, but that many employers still require proof from their prospective employees of having passed matric.

developed. (A process whereby this could take place is discussed in Chapter 4 of this guideline document.) This is true for all the levels of education and training. Statistics South Africa released figures of the 2001 census that made it clear where it is critical to start implementing RPL:

The level of education of those aged 20 years or older:

- 8,4% have education level above grade 12;
- 20,4% have grade 12;
- 30,8% have some secondary schooling;
- 6,4% have completed primary schooling;
- 16,0% have some primary schooling; and
- 17,9% have no schooling.

Those people who have some secondary schooling (30,8%) and those who have some primary schooling (16,0%) are most likely to be in formal or non-formal employment (or may be unemployed). This means that the audit of current practice is equally important for workplaces wanting to implement RPL and for employment centres, where candidates who seek work could be assisted to be given recognition and credits for their prior learning.

1.2 Current regulations

It is evident from the audit of current practice that there are existing regulations that inhibit the implementation of RPL policy and procedures. Regulations differ from institutional access and admission policies in that they originate at a statutory level and are more difficult and time-consuming to amend.

The following regulations are discussed in this section:

- the 50% residency clause; and
- matriculation certificate and entry into higher education.

The 50% residency clause

An important regulatory obstacle has been identified in the awarding of credits, assuming that an RPL process is in place. This obstacle relates to the **50% residency clause**. This clause was developed as a result of the need for **credit transfer between institutions** of higher learning when a learner wants to study at a different institution from where he/she was first enrolled (i.e., when relocating) or when study was interrupted. Historically this does not relate to RPL. However, it is now being used in relation to RPL at institutions that have developed such policies and procedures.

In essence, the 50% residency clause means that a learner, having been granted credits through an RPL process in terms of a recognised qualification, must still complete at least 50% of the learning programme with the institution regardless of whether the credits granted exceed 50 % of the requirements, or even fulfil all the requirements of the qualification. This has become

particularly evident from providers of education and training that doubt **the academic skills** of candidates who have accessed education and training via non-traditional routes. This is in direct contradiction of the principles of RPL. Some of the principles of RPL are captured in the RPL policy as follows:

- Learning occurs in all kinds of situations – formal, informal and non-formal.
- Measurement of the learning takes place against learning outcomes required for a specific qualification.
- Credits are awarded for such learning if it meets the requirements of the qualification (Executive Summary – SAQA RPL policy).

This means that a learner may meet all the requirements for a particular qualification, and should therefore not be expected to re-do 50% of that qualification simply because institutions fear a drop in standards. The important point to make here is that it is the job of the institution to assess the candidate and to satisfy itself that the candidate meets the necessary requirements in every respect. By using the 50% residency clause, in a sense, the institution doubts its own ability to ensure that the stringent requirements of the programme are assessed. (Assessment and the quality assurance thereof will be discussed in more detail later.)

This area needs critical engagement with all the roleplayers involved in deciding whether this clause, which is part of the current (unrepealed, interim) regulations of the Matriculation Board, should be retained.

Matriculation certificate and entry into higher education

Another obstacle that limits the full implementation of RPL originates from the requirement that the successful completion of a matriculation certificate is a pre-requisite for the awarding of post-matriculation qualifications. This could mean that an adult learner, with an incomplete matric, who may have met all the requirements of a post-matriculation qualification (possibly obtained in part through RPL), cannot be awarded this qualification until he/she has completed the matriculation certificate.

To date, very few providers have engaged with the Matriculation Board to enable the completion of a matriculation certificate through RPL. Higher education providers that have attempted to do this in order to enable greater access to students who do not meet the minimum requirements for access to higher education qualifications have expressed the need for a national body that can take up this responsibility, contending that it cannot be taken up by individual providers. Although many providers that feel able to take up the challenge of offering matric-focused RPL may contest this suggestion, it does have merit and represents an obstacle to the implementation of RPL processes.

These examples are by no means exhaustive. In the words of Harris (2000: 93):

“You may well find that there are regulatory [and policy and procedural] knots in your institution that have to be untangled”, before a start can be made with the planning of such an initiative. This may include the statutory requirements of professional bodies that require a

minimum level of qualification, such as matriculation with endorsement before professional registration can take place.

Regulations and policies are not the only possible inhibitors to the implementation of RPL. Administrative processes may also contribute to difficulties in terms of implementation.

1.3 Administrative Procedures

On a much more practical level, it has become clear that providers/institutions should look at their administrative processes and the extent to which these inhibit the transcription of credits within their administrative systems.

Outcomes versus subjects and modules

It seems that there is the mistaken perception that new qualifications (or re-formatted qualifications) registered on the National Qualifications Framework (NQF) are just ‘old wine in new bottles’. That means that the subject and module objectives can be redefined in terms of learning outcomes and that these would then be considered outcomes-based qualifications. (A full discussion on the outcomes-based approach, particularly in terms of the setting up of assessment, follows later.)

The implication of this false perception, in terms of the **administrative processes** of institutions, is that administrative systems do not make provision for the awarding of credits towards outcomes, but towards subjects and modules. It should be noted that **an outcome is not equivalent to a subject or a module**. Outcomes are broad statements encompassing the purpose and requirements of qualifications and do not directly translate into subjects or modules. Subjects and modules are the vehicles through which the outcomes of a qualification are achieved. Currently, the capturing of credits towards the outcomes of a specified qualification is problematic because administrative systems were developed for, and are still geared to, awarding credits towards subjects and/or modules. Implementers of RPL must clearly identify which composite parts will make up the credits needed for the attainment of an outcome, and the administrative system should be able to capture and transcribe such credits (Heyns, 2004).

The implication goes further: for **credits to be transferable** within an institution and between institutions, subject or module credits cannot be used. Different faculties, departments and providers/institutions interpret the content supporting the achievement of exit-level outcomes differently. This is acceptable as long as the requirements of the outcomes are met. However, when outcomes are perceived to mean ‘content’, difficulties arise. Consider the following hypothetical example:

In a Bachelor of Commerce (B.Com.) Management degree offered at Institution A, the outcome “Qualifying learners can demonstrate an understanding of quality management”, may be achieved by teaching learners about the ‘ISO 9000’ quality approach. In Institution

Z, the same outcome is achieved by teaching learners about ‘Total Quality Management’ or the ‘Business Excellence Model’. If credits are awarded for the module: Quality management systems, based on the content of the module, there is clearly a difference in opinion as to which model is the preferred. However, both of these providers have ensured that the concept ‘quality management’ is understood and used and that it forms the basis for further learning. Credits should therefore be awarded against the outcomes of the qualification, as this will ensure transferability of credits.

An important point to note therefore is that the learning programmes of providers and institutions are not generic. Qualification descriptors and, in particular, the level descriptors for a level on the NQF, do provide generic descriptions of the learning expected at a particular level. When equivalence of learning is determined, it is important to have a clear understanding of the broad descriptor associated with the level, breadth and depth of learning required. This will prevent a highly technician view of RPL assessment (more about assessment in Chapter 4: The Tools).

Would-be implementers of RPL must therefore look closely at the extent to which their administrative systems (and those of their ETQAs) make it possible to award credits against outcomes, rather than against modules or subjects.

1.4 Funding and the sources of funding

As is the case with most developments in education and training, funding determines the rate at which implementation takes place. It is also clear that the current sources of funding will not be sustainable in the long term, and that it will become increasingly important for providers to consider financially viable models of RPL delivery.

The audit of current practice has identified the following sources of RPL funding:

- Direct funding is derived from the National Skills Fund (NSF), specifically for unemployed candidates. Discussion with the Department of Education (DoE) and the Department of Labour (DoL) in terms of plans for funding/subsidies and possibilities of accessing NSF funds for RPL initiatives should be accorded high priority.
- Private/Business initiatives exist mainly in larger corporate institutions, two of which have been identified in the banking sector. Cost effectiveness is a priority and is also linked to the availability of workplace-based unit standards.
- Sector Education and Training Authority (SETA) funding, e.g. SERVICES SETA has put out a tender for the establishment of Career Centres in an attempt to identify learnership candidates within their sector, including RPL assessments of such candidates. To date, six Career Centres have been set up and a large number of people have undergone the first phase of the process.

The NSF is often targeted as a resource for a range of projects. It is important that provisioning of RPL is done in a cost-effective and well-planned manner. Continued dependence on external funding, from whatever source, will be detrimental in the long run.

In the draft New Academic Policy³ (CHE, 2001: 97), mention is made of the formalisation of funding and subsidy arrangements for Foundation Certificates (NQF 5) and ‘academic development’ programmes which, in terms of this approach, would be ‘articulation’ qualifications for which institutions will receive funding from the DoE. This would meet the need for funding of education for learners at the lower levels of the NQF, but it assumes that a full ‘articulation’ qualification is required before RPL learners will be ready to access higher education.

This approach to formalising funding and subsidy arrangements does not deal with subsidies for RPL learners who may wish to access higher levels of the NQF; neither does it address the high start-up costs associated with the development of appropriate policies and procedures for RPL. Unless these aspects are addressed, the lack of structured funding will become a disincentive to the implementation of RPL across all levels of the NQF.

1.5 Costing and Comparative Studies

The RPL policy (chapter 2) states clearly that:

Fees for the delivery and administration of assessment and RPL services, [should] not create barriers for candidates. The development of services and programmes is an investment in the lifelong learning approach across all levels and sectors of education and training in South Africa.

This statement has a number of implications for implementers of RPL:

- The extent to which high start-up costs will inhibit the development and implementation of RPL at institutional level in a resource-scarce environment.
- Cost recovery should not be the basis for the fees candidates are required to pay.
- The following options for charging fees:
 - time spent on the RPL service and RPL assessment; or
 - a common fee regardless of the number of credits claimed and the work required to complete the process; or
 - a fee in relation to the number of credits claimed.

High start-up costs

This guideline document makes it clear that there are many important factors that have to be considered when a provider/institution is planning to implement RPL. All of these considerations cost time, if not actual money. However, start-up costs should not inhibit the development of RPL services.

³ As noted before, the draft New Academic Policy (CHE, 2001) has not been finalised. However, the Education White Paper #3 supports the possibility of targeted funding. It is important that these policy decisions be taken further.

One possible way of absorbing the cost is to ensure that RPL activities are integrated into the reformatting processes required of all institutions that have submitted qualifications for interim registration.

It also makes sense to identify particular target markets and initiate RPL services in those areas first before they become institutional practice and, from these lessons learnt, to then develop cost-effective approaches to RPL.

In addition, it seems clear that the more RPL can be integrated into mainstream services and approaches, the more cost effective it becomes.

Cost recovery versus fee structure

Formal mainstream programmes in public institutions are subsidised. Learners are therefore not required to pay the actual amount it costs the government to educate them. Although there is currently no clear subsidy structure for RPL, it is important that the main beneficiaries, the candidates, are not disadvantaged by the perceived high cost of RPL.

Also, private providers offering RPL services make up a large proportion of delivery. Such providers are not eligible for subsidies and care should be taken to see that RPL does not become too costly for the individual.

It should be acknowledged that the development of all new programmes cost money but that as the number of learners in a programme increase the more cost-effective the programme becomes. The planning of institutional RPL services will therefore be informed by the cost of development, but should not be wholly determined by it.

Charging for RPL – what and how

Costs could be based on the overall length of the programme by identifying the time it would take in a classroom-based situation to prepare and assess learners. An example of such costing is set out below.

If a National Certificate (120 credits) takes an average of 1 200 hours to complete, then calculate the time spent by a teacher/lecturer/trainer on preparation, assessment and judgement of evidence (for example, 20% of the time). This percentage could be used as a guideline for the establishment of cost.

Consider the University of South Africa (UNISA) example:

- Registration for the RPL000-X module costs two-thirds of the price of one module.
- Registration for the assessment of each module will cost one-third of the price of the module.
- For challenge examinations, only the assessment fee for each module is charged. (www.unisa.ac.za/dept/rpl/faq.html)

In addition, international studies have revealed the following three options for charging of fees:

- i. fees based on the time spent to complete the RPL process; or
- ii. a common fee irrespective of time spent or the number of credits awarded; or
- iii. a fee based on the number of credits applied for and awarded.

(Harris, 2000: 131)

The last option seems to be problematic as this could easily associate RPL with the ‘sale’ of qualifications.

As a guideline, Whitaker (1989: 9-10) developed criteria for the Council for Adult and Experiential Learning (USA) that deal particularly with fees:

Fees charged for assessment should be based on the services performed in the process and not determined by the [number] of credit[s] awarded.

The British system is in agreement with the above approach. It is considered a ‘malpractice’ to base “assessment fees on the number of credits awarded” (Nyatanga et al., 1998: 9).

The SAQA RPL policy provides quality criteria, inter alia, in relation to fees and charging for services (below). The core criteria were developed to facilitate quality assurance of RPL processes and services by an ETQA. The table below is an example of an evaluation tool, which could be used by the ETQA and by the provider/institution as a self-audit tool. Also, would-be implementers of RPL could use these criteria as a guideline towards attaining the ‘ideal’:

FEES FOR RPL SERVICES

Fees for the delivery and administration of assessment and RPL services do not create barriers for candidates. The development of services and programmes is an investment in the lifelong learning approach across all levels and sectors of education and training in South Africa

	YES	NO
Fees should not create barriers for candidates.		
The fees for the assessment of prior learning should be less than the cost for a full-time module or learning programme.		
Credit-bearing portfolio development or other articulation programmes are made increasingly available to assist candidates in their preparation for assessment, and to qualify for available subsidies for selected skills programmes and learnerships.		
Flexible payment options, in line with the policies and procedures of the ETQA and constituent providers, are available.		
Research and development priorities are identified, including those that investigate costs and cost effectiveness.		

There is no doubt that RPL ‘costs’, but would-be implementers of RPL have to find ways in which RPL ‘pays’. This means that one must look at RPL in terms of ‘cost-benefits’, rather than only in terms of high start-up costs and the cost of capacity development of resources and staff. Harris (2000: 132) suggests that the calculation of cost for RPL services should always be offset by the “social cost of not valuing prior learning”. With this in mind, she suggests the following cost-benefits to institutions:

- New and experienced learners are attracted to the institution – standards actually increase rather than decrease.
- Student recruitment and retention rates tend to increase.
- Staff can learn from the candidates, for example about developments in the workplace – this is useful for curriculum and pedagogy.
- Staff can gain valuable insights into different and non-dominant cultures of knowledge – which can and should form a useful adjunct to traditionally academic ways of thinking about knowledge.
- Engaging with RPL means that curricula can build meaningful links with the communities they seek to serve.
- The process of implementing RPL forces staff to understand what their curriculum actually requires of learners and to clarify issues such as the meaning of particular levels, notions of academic coherence and equivalence.

(Harris, 2000: 132)

It is critical that institutions look at the cost associated with the development of RPL services against the background of the transformation imperatives of the new education and training system. There are many benefits to be gained from engaging with the processes involved with the development of RPL processes and services, the least of which is the professional development of practitioners and the influence this may have on general teaching and learning practices. If RPL is seen to be a legislative directive, rather than a social responsibility and an opportunity to add value to educational practices, RPL could easily become the ‘victim’ instead of the ‘agent’ of transformation where, once the real (or perceived) socio-political imperatives have been met, it is no longer practiced (Heyns, 2004).

1.6 Curriculum development

An audit of current practice has highlighted the extent to which curriculum development has changed from being input-based to becoming more outcomes-based. Curriculum developers are increasingly being confronted with RPL when curriculum design is based on NQF-registered unit standards and qualifications. On the other hand, it is also true that Standards Generating Bodies (SGBs) and National Standards Bodies (NSBs) are being confronted with the reality of including specific reference to the ‘RPL-ability’ of qualifications and unit standards.

The SAQA RPL Policy proposes the following table as a self-audit and quality assurance guideline for curriculum development:

RPL AND CURRICULUM DEVELOPMENT		
Assessment and RPL practice increasingly inform the development of new standards, qualifications, learning programmes and curriculum. Providers increasingly use methods of instruction and delivery to provide curricula to meet the diverse cultural, ethnic, linguistic and educational needs of learners.		
	YES	NO
Learning programmes increasingly take into account the nature and form of knowledge produced in previously excluded constituencies and locations, e.g. indigenous knowledge, women’s knowledge, workers’ knowledge, etc.		
The curriculum increasingly incorporates indigenous and other knowledge forms to reflect the diversity of needs and goals of the learner population.		
The design of learning programmes indicates how candidates’ prior knowledge has been affirmed and taken into account.		
The curriculum is flexible to allow for flexible entry and exit points to enhance access and the achievement of learning goals.		
Emerging trends from assessment and RPL where these have implications for modification and redesign of unit standards and qualifications, are forwarded to the appropriate bodies.		
Where candidates demonstrate knowledge that does not easily fit existing unit standards or exit-level outcomes, credit equivalencies are established in consultation with subject experts and relevant ETQAs.		

From the audit of current practice it is evident that the purposes of RPL initiatives are sector-specific and range from employability, advanced standing, admission, access, the awarding of credits, to job promotion. The design of curricula should accommodate various forms of assessment and, more specifically RPL, for various purposes.

1.7 Regional collaboration/inter-institutional RPL

From the wider ‘access’ debates an approach to RPL is emerging that may facilitate the development of services and thereby alleviate the associated costs. This approach relates to regional and/or inter-institutional collaboration models. The Free State Higher and Further Education and Training Trust (FSHFETT) is a consortium of providers who have decided to join resources to deal with access requests across all the member institutions effectively and efficiently. An example of the FSHETT model is included as Annexure A.

Essentially, the model proposes that a consortium of providers pool their resources and agree on processes and systems that will satisfy all the members of the quality of such processes. This will mean that fewer in-house, individual costs needs to be incurred, as these are shared

between the members. The model also has an impact on the capacity and resources required for the development and implementation of RPL services per institution.

Some of the benefits identified by FSHETT in terms of collaboration include:

- Co-operation keeps the costs down.
- Co-operation is not competition.
- Regional institutional co-operation is a way to strengthen the regional economy and the social well-being of the local environment.
- Co-operation may be a way to regenerate and build new skills.
- Co-operation complements institutional competencies and programmes.
- Pooling of resources enables institutions to mobilise more significant strategic strength than being on their own.

(Strydom, 2002: 31-32)

Other important benefits, not directly related to cost, include:

- the development of learning paths by means of clear articulation of programmes between bands and institutions;
- the facilitation of credit transfer;
- consensus on the level(s) and the minimum requirements for candidates seeking credits for particular qualifications;
- alignment of quality assurance, which can be agreed upon and conducted in a coherent fashion; and
- the ability of institutional autonomy to remain intact, as RPL services and assessment deal with generic issues and overall outcomes, not content.

1.8 Additional barriers to RPL implementation

Some additional barriers to successful implementation of RPL are perceived to be:

- the perceived lack of reformatted qualifications, i.e. qualifications developed in accordance with outcomes-based education principles;
- the absence of registered assessors; and
- delays in the accreditation of education and training providers.

Reformatted qualifications in terms of outcomes-based principles

It should be noted that all qualifications currently registered on the NQF had to be submitted in outcomes-based format to qualify for interim registration. This required that each qualification had, at least, a purpose statement, learning outcomes and associated assessment criteria, and articulation possibilities, international comparability and moderation options. It also required a statement about how RPL may be implemented against the outcomes of the qualification (Regulation 11(c) of the NSB Regulations). A recent SAQA decision was that all such 'interimly' registered qualifications are to be considered fully registered, and that such registration is valid until June 2006 (SAQA decision number 1043/02).

This decision is important because it means that there are now no qualifications on the NQF for which RPL could not be used. However, it should be acknowledged that not all qualifications are equally suitable for RPL and that articulation possibilities are impeded by the two types of qualification registered on the NQF.

The first type of qualification is a **unit-standard-based qualification**, where credits are awarded towards specific unit standards in terms of the overall purpose of the qualification, allowing the learner the opportunity to complete the outstanding unit standards that are needed to achieve the qualification through a process of RPL. Unit standards are nationally agreed descriptions of the results of learning, and credit transfer between different providers is facilitated by the fact that learners have to meet the same requirements to prove competence, regardless of which provider has offered the programme and regardless of the content of the programme. Articulation and credit transfer between different (but closely associated) fields of learning and between institutions are facilitated in this way.

The second type of qualification is where the **qualification is based on exit-level outcomes**, which have been structured into modules or subjects rather than into unit standards. This is typical of most higher education qualifications and schooling qualifications and presents limitations to RPL assessment, specifically when inter-institutional articulation is a priority. This is because subjects and modules are generally content-based rather than output-based. Institutions interpret the learning content to meet the requirements for the exit-level outcomes differently. If credit transfer and articulation are based on subjects and modules, rather than on the specified outcomes of the qualification, not only is the process of credit transfer inhibited, but also the implementation of RPL against the requirements for the qualification; i.e. the descriptions of the results of learning. (For the outcomes of the qualification – refer to the discussion under Section 1.3 (Heyns, 2004)).

The draft New Academic Policy⁴ puts this very clearly:

If higher education institutions, [in particular] are to take up the RPL challenge, they will need to develop appropriate, consistent and quality assured RPL policies, practices and assessment instruments based on the specification of entry requirements and learning outcomes (CHE, 2001: 104).

The absence of registered assessors

The requirements and skills of registered assessors will be addressed in the section of this document dealing with “capacity building of resources and staff”. However, it should be noted that in the SAQA RPL policy, it is suggested that assessors dealing with RPL candidates may need additional sensitisation with regard to their own possible biases towards candidates and the processes required to assess such candidates. This will be discussed in Chapter 3.

4 As before, this is supported by the Education White Paper (#3, p. 15) as follows: "The Ministry strongly supports developmental work and pilot projects which will help institutions to develop criteria to assess applicants' prior learning and experience, so that those with clear potential to succeed in higher education can be admitted".

The delays in the accreditation of education and training providers

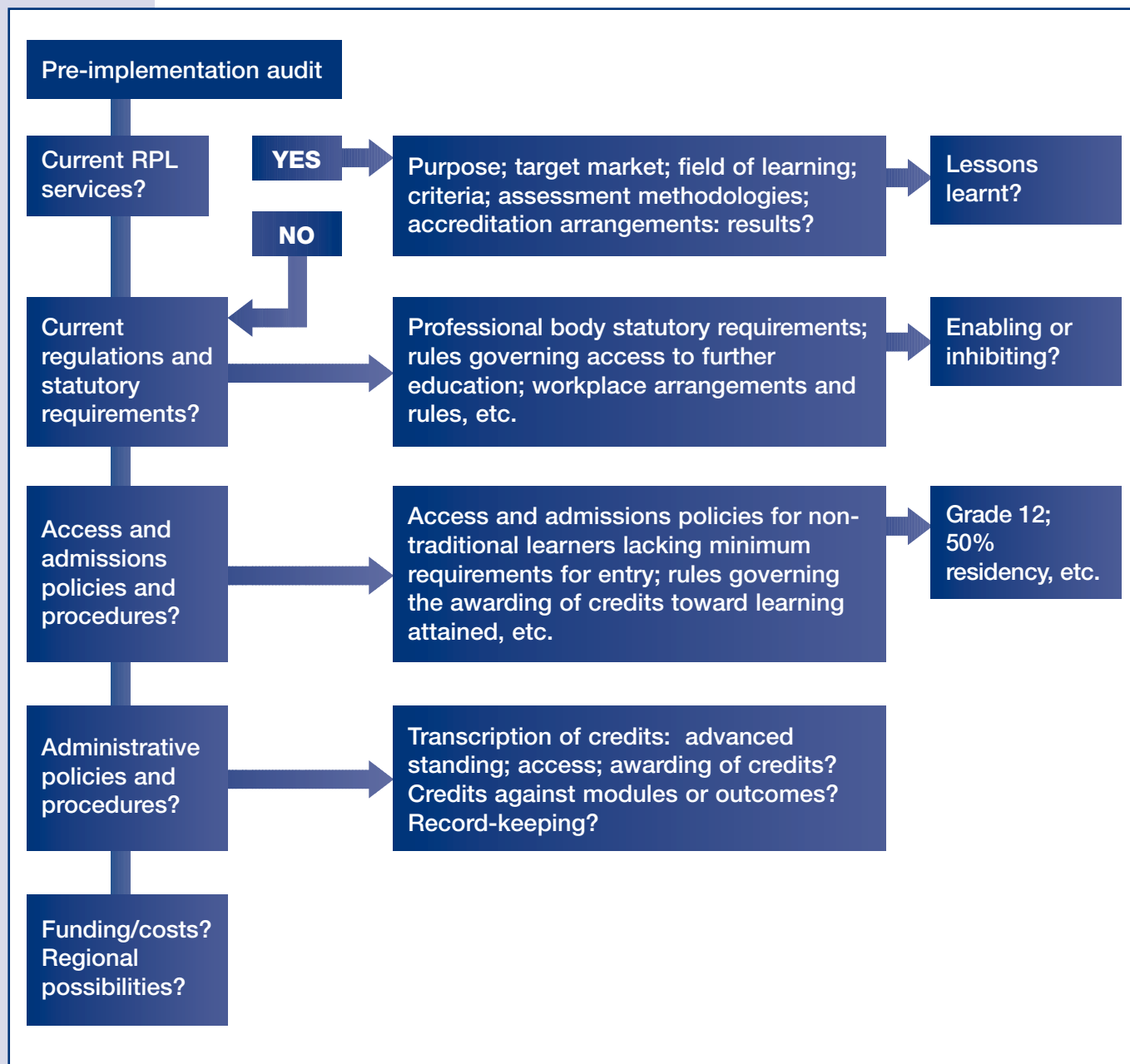
Private providers in particular are finding the delays associated with their accreditation limiting when they are planning their implementation of RPL. RPL processes currently offered by such providers will have no value, except intra-institutionally, unless they have been accredited. The speeding up of the accreditation of providers should be a priority for ETQAs.

Summary

This chapter attempted to highlight some of the current practices, regulations and policies, as well as administrative and perceptual issues, which may inhibit the implementation of RPL. These examples are not exhaustive, but are intended to sensitise would-be implementers of RPL to the possible barriers that may emerge when an initiative is planned. Within different contexts, different barriers may arise; for example, a workplace context will have particular workplace issues to contend with. For RPL to be implemented successfully, buy-in must be obtained from all the roleplayers in the organisation, including its management and executives. The purpose of this chapter is, therefore, not to paint a gloomy picture for the feasibility of RPL implementation, but to assist would-be implementers to establish and develop informed plans. It is clear that providers of education and training need to be aware of the barriers to RPL implementation before they make a start. This could be considered to be a 'pre-implementation audit'. However, it goes without saying that regular, structured audits will take place in the future, possibly making use of the information gained through the pre-implementation audit as a benchmark for, and evidence of, progress towards a holistic RPL system.

The South African education and training system has the opportunity to develop RPL systems and processes that will meet the needs of all the stakeholders, provided RPL plans are based on a solid grounding and a full contextual understanding of the environment. The National Plan for Higher Education (DoE, 2001), suggests that access to larger numbers of learners may be achieved if higher education institutions: "set minimum criteria for automatic admissions into different academic programmes; and establish selection processes to determine the suitability of applicants who do not meet these minimum criteria".

To conclude, the following diagram may be helpful for an audit of current practice:



Chapter 2 will deal with the development of sector-specific and/or context-specific plans.