

DRAFT DHET RESPONSES TO THE RECOMMENDATIONS OF THE HIGH LEVEL PANEL ON THE ASSESSMENT OF KEY LEGISLATION AND THE ACCELERATION OF FUNDAMENTAL CHANGE

13/08/18

RECOMMENDATION	AGREE/DISAGREE	RESPONSES
<p>1. The Panel recommends that Parliament guides the overhaul of the skills development policy in line with the principles outlined below.</p> <ul style="list-style-type: none"> - Skills development must respond to two divergent dynamics: participating in a globally competitive environment that requires a high skills base including more skilled artisans and a local context that creates low-wage jobs to absorb the large numbers who are unemployed or invulnerable jobs. - A greater impact on poverty, inequality and unemployment, which mostly affects persons who have not yet achieved an NQF level 4 qualification, can be made stronger by focusing on quality lower NQF level qualifications (1 – 4), both as goals in themselves through employment in as well as a pathway into high skills qualifications. - Skills development must be focused not only on employability but result in a qualitative change in the lives of South Africans, fostering holistic human development, capabilities for sustainable livelihoods, and self-employment (and entrepreneurship). 	<p align="center">Agree</p>	<p>1. Research undertaken by the Labour Market Intelligence Project (LMIP) reveals that “economic growth in SA, while modest, has favoured high-skilled workers, despite the fact that the majority of the unemployed population is low-skilled”. This has resulted in unacceptable high levels of NEETs in the country. The structure of the SA economy therefore favours high level skills – at the same time – we have a severe NEET challenge. The Department’s policies attempts to balance these two imperatives – namely, the need for high skills levels on the one hand, and the need for basic and intermediate skills on the other, through programmes at PSET institutions. As indicated in the White Paper on PSET, the Department is strengthening its understanding of labour market intelligence in order to improve its planning to ensure the supply of high, medium and basic skills.</p> <p>2. Close to two-thirds of the unemployed have an education level that is less than secondary education certificate. The</p>

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		<p>Department therefore provides adults with Basic Education (up to Grade 9), as well as opportunities to complete matric through its Community Education and Training Colleges (CETCs). It now aims to expand opportunities for skills for sustainable livelihoods through its CETCs. The Department acknowledges that access to formal basic education (including up to matric) for adults needs to be expanded – and more so, that opportunities for skills for sustainable livelihoods need to be expanded. It is currently attempting to address this challenge.</p> <p>3. Entrepreneurship training and development is central to fostering self-employment – not only at the level of basic skills, but even at the high skills end. The Department has established an entrepreneurship development programme that targets both Universities as well as TVET Colleges – however, this programme is still at an embryonic stage.</p> <p>4.</p>
<p>2. The basic education sector is currently designed to channel learners towards a skilled (academic) career path. However, the results achieved indicate that this is an unrealistic expectation for most learners given current outcomes in basic education. To align the basic education sector to the economy's needs the following should be prioritised:</p>	<p>Agree</p>	<p>Of the 600 000 odd learners who write the matric exam, only about 200 000 enter a university. Some of those who complete matric enter TVET Colleges to take up the N4-N6 programmes in order to achieve the N Diploma.</p>

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<ul style="list-style-type: none"> - Improving the quality of the senior certificate to adequately prepare learners on an academic career path for entry into higher education and professional and managerial careers. This will require a radical improvement of the quality of teaching and improving access of learners to online learning resources. - Creating a track that would channel the majority of learners to vocational educational career paths. In countries with low youth unemployment (Germany, Switzerland and the Netherlands), around 50% of learners pursue a vocational track. 		<p>The majority have few options. A vocational pathway for school learners is therefore key to improving employability. However in carving out an alternate pathway for VE for the schooling system, it is imperative to develop a new qualification, with clear entry and exit requirements. In this regard, the current NC(V) is an option that could be seriously considered for adaptation. In addition, we need to be realistic about what we can afford (because vocational programmes are much more expensive than simple classroom teaching). We would probably have to choose vocational programmes that do not require major workshops and laboratories at schools. Further, teacher retraining and the training of new teachers have to be developed and implemented. It is proposed that VE in schools could focus on programmes such as ECD, tourism, secretarial, clerical programmes, which are currently occupations in high demand, while TVET Colleges and Technical schools could focus on programmes that are resource intensive. The Minister of Basic Education has established an inter-ministerial task team to consider options on taking this matter forward. DHET representatives are currently actively involved in this task team.</p> <p>However, there is a need for more expertise on this matter. It is therefore proposed that a high level panel be established to take forward this proposal.</p>

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3. The reform of the Technical Vocational Education and Training (TVET) sector continued and resulted in a growing enrolment in TVET colleges, which more than doubled in three years, from 358 000 in 2010 to 794 000 in 2013 (Engineering News, 2014). However, the current design of TVET qualifications need to be aligned with employer needs and adjusted to improve employability on completion of studies by restructuring the practical component of the qualification in line with the models used in countries with low youth unemployment	Agree	Anecdotal evidence suggests that very little practical training takes place in many TVET Colleges (though there are islands of excellence). We agree that attention to practical work needs to be given greater attention – starting with research to understand better the nature of the challenge, then focusing on lecturer training and redirecting resources towards workshops and laboratories etc . The Department is in the process of initiating research to this end, and will develop an improvement plan and act on the plan following on the research findings. The Centre of Specialisation (COS) programme is ensuring that identified Colleges will have the necessary equipment and lecturer development interventions to facilitate and promote practical work
4. Adjusting the current B-BBEE codes to create incentives for companies to provide the apprenticeship (workplace-based learning) component in pursuit of the skills development expenditure targets. Systematic exposure to a potential employer over a number of years has been shown to increase the potential of employment of completion of vocational studies. Reviewing qualification content with employer/industry bodies to ensure that the curricula meet industry requirements. There is a general perception among employers that curricula are outdated and often include subjects with little practical application.	Agree on need for curriculum responsiveness and update BBBEE is Subject to policy developments in other government departments	Research confirms that TVET Curricula need to be updated. The White Paper on PSET also confirms this. And there is wide agreement that curricula must be responsive to the world of work. QCTO is already undertaking this task, and the COS project leads the way on models of engagement with employers. Universities and TVET Colleges are encouraged to establish partnerships with employers to promote curriculum responsiveness. The HRDC has produced a report on partnerships in TVET Colleges, and the LMIP project has produced case studies on the nature of partnerships

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		between universities and business. The latter focuses on the sugar industry, the motor industry and the Square Kilometer Array (SKA).
<p>5. The higher education sector needs to be incentivised to produce adequate number of graduates to meet the economy's requirements. The approaches used internationally include establishing new government-funded institutions, encouraging the private sector to establish new institutions or a combination of both. Brazil has followed a combination of all these options and has increased access to tertiary education to 30% of the population with a third of students studying through the private sector (Redden, 2015). To achieve this goal, the following needs to be prioritised:</p> <ul style="list-style-type: none"> - Reviewing qualifications to ensure they meet the requirements of future employers; - Readjusting the subsidy system to prioritise scarce skill qualifications; Establishing higher academic institutions with a mandate on graduate output, not just the current mandate on teaching and research – this will improve throughput and increase the rate of students entering tertiary education; - Improving retention during studies. According to the Council for Higher Education (CHE), only about one in four students in contact institutions graduate in regulation time; only 35% of the total intake, and 48% of contact students, graduate within five years, and it is estimated that some 55% of the intake will never graduate (Council on Higher Education, 2013). Unlike in the UK where universities have to keep attrition rates down to less than 13% or face financial penalties (Gaynor et al., 2006), there is no penalty system in South Africa linked to attrition. 	Agree on issues regarding the need for curriculum, qualification and programme responsiveness	<p>There is a need to expand enrolment in HE, as well as to increase the number of HE outputs. SA's Gross enrolment rate in HE remains low compared to other middle income countries. In addition, the proportion of the labour force with a degree remains low in SA in comparison to other middle income countries. This reduces our international competitiveness. It is proposed that other options for expansion, such as blended learning be considered. Throughput remains low, however, there have been improvements over the past few years. The NDP sets enrolment targets as well as targets for graduates in SET programmes. The Department is undertaking its enrolment planning in line with the NDP targets. Although throughput rates remain low, these have improved over the past few years.</p> <p>The Department is responding to occupations in high demand by ensuring that enrolment planning and career guidance and NSF bursaries are directed towards such occupations. The international scholarship programme also responds to scarce skills.</p>
<p>6. Policy should include in its definition of target groups specifically those that have been and continue to be marginalised from the system or are struggling to access the formal system: youth not in education, employment or training; poor, black rural and township communities, rural black women, and so forth, which can then be more expressly targeted as vulnerable groups, and targeted policy mechanisms can be designed to reach them and provide them specifically with</p>	Agree – however, as indicated in the 1 st recommendation we need to ensure that we	<p>The need for a framework for skills planning is reflected in the White Paper on PSET. We will need an integrated approach to planning and to an integrated approach to budgeting. Embryonic thinking in this regard has occurred – this needs to be accelerated. As indicated above, there</p>

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<p>access to skills development. In addition, the appropriation of the budget by parliament should explicitly target these groups and ensure adequate budgetary allocations are set. As these are not often explicitly set out in legislation, this has led to poorly identified target groups. In addition to explicitly stating the policy intent and key target groups, legislation must include an indication of resources and the proportion of resources that will be allocated to these groups. Parliament has the competency to allocate resources, which it hardly exercises. These systemic silences limit the contribution that skills development legislation and policy can make towards addressing economic, social and developmental concerns. Poor recognition of explicit policy goals at legislative and policy level translates into poor implementation of general policy intent.</p>	<p>remain globally competitive. The idea is to create a balance.</p>	<p>needs to be a balance in ensuring that we meet high, intermediate and basic skills needs of the economy. It should be noted that the NSF directs most of its funding to marginalised and vulnerable groups, especially those in rural areas.</p>
<p>7. It is absolutely critical for addressing the triple challenge that post-school education and training (PSET) legislation shifts from its focus on governance, advising, planning, funding, quality assurance and standard setting towards actual provision of skills.</p> <p>The sprawl of regulatory institutions may have led to the slow pace of change. The overregulation and bureaucratisation of the system may be impeding rather than facilitating skills delivery.</p>	<p>Noted</p>	<p>The White Paper on PSET states clearly that the NQF needs to be simplified. The recent evaluation of the NQF proposes some ways in which this can take place. The NSDP and SETA landscape document proposes ways in which coordination among SETAs could improve.</p>
<p>8. Part of the reason for failure to implement is excessive complexity in the skills development system overall, which must be simplified and efforts made to rationalise regulatory institutions. Moreover, the complexity and lack of flexibility creates severe difficulties and disincentives for key stakeholders (such as SMMEs) to participate in skills development (e.g. WPBL provision), and in communicating the opportunities in the PSET system to the wider population, and for specific marginalised target groups being able to understand, access and succeed in PSET.</p>	<p>Noted</p>	<p>As above. The proposed National Skills Development Plan and the SETA Landscape attempts to address this problem – however, the imperative of simplification needs to be improved in both documents. The Career Development System does communicate information about opportunities for WBL – however more needs to be done to make information more widely available</p>
<p>9. The sheer number of bodies that have some role in relation to quality, for example, has reached unsustainable proportions (they include, inter alia, the South African Qualifications Authority (SAQA); Council on Higher Education/Higher Education Quality Committee (CHE/HEQC); Umalusi; the Quality Council for Trades and Occupation (QCTO); 21 Sector Education and</p>	<p>Noted</p>	<p>It should be noted that plans are afoot to incorporate NAMB into QCTO, as recommended by the White Paper.</p> <p>The White Paper does not specifically direct the</p>

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<p>Training Authorities (SETAs); 93 professional bodies; National Artisan Moderation Body (NAMB); South African Institute for Vocational Training and Continuing Education and Training (SAIVCET), and so forth). Similarly, the number of bodies with planning, monitoring and/or advisory responsibility is excessive. They include, for example, the National Skills Authority (NSA), Human Resource Development Council (HRDC), along with SAQA, CHE/HEQC, SETAs, skills development forums and so forth. There is a need to consolidate and rationalise this system and, for example, centralise the planning of human resource development at a level where it can ensure policy and implementation alignment across government departments.</p>		<p>Department to rationalise all of the structures referred to. This proposal has major policy ramifications, and requires deeper engagement.</p>
<p>10. The higher education system has expanded to a level where it is now 'massified' and provides learning opportunities for close to 20% of the 20 – 24-year age cohort. Conversely, the vast majority of the same age cohort (80%) does not successfully participate in higher education, and the number of youth in general who are not in employment, education and training (NEET) is huge and growing. We thus recommend greater with emphasis on occupations, trades and WPBL especially at FET and lower HET levels, alongside general/academic and professional HE.</p>	<p>Agree</p>	<p>Enrolment in TVET has expanded fourfold since 1994. The Department continues to expand opportunities for intermediary skills and WBL as can be seen from enrolment and registration figures. As indicated above, the balance between high, medium and basic skills is key – and to find the "Goldilocks" state is our target</p>
<p>11. What is critical for this recommendation to be successful is a simultaneous process to ensure that TVET institutions and the suite of occupational qualifications and WPBL provisions are attractive and have parity of esteem in society. Critical pre-requisites are improved throughput/success rates and achieving closer links with workplaces (see recommendation related to WPBL). The value of technical, vocational and occupational qualifications should be communicated better at basic education level (pre-Grade 9).</p>	<p>Agree</p>	<p>As above</p>
<p>12. South Africa competes for skilled graduates in a global market and has lost substantial numbers of graduates to the international market. While South Africa has specific pull factors (enablers) that give it a competitive edge over wealthier nations –such as work experience and lifestyle, there are significant barriers to entry to foreign skills. Most countries are (1) streamlining their application processes, often putting them online, (2) employing independent recruitment organisations to source and place required skills, and (3) continually amending</p>	<p>Agree – this proposal however relates to the DHA as well</p>	<p>The Department works closely with the Department of Home Affairs to share information about occupations in high demand. The Department has improved its capacity for labour market intelligence and produces regular reports on skills supply and demand and the list of occupations in high demand. It plans to</p>

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<p>policies to open the doors to potential applicants. Supplementation from abroad is, therefore, a viable and needed strategy, and current restrictive policies that place limits on qualified foreign professionals do not serve the needs of the country (Segatti, 2014). There is an urgent need to lower barriers to entry and to simplify bureaucratic processes. Closely monitoring the labour market needs linked to time-limited work permits for foreign qualified professionals will stimulate the economy in the short term while, in the long term, ensure that employment opportunities for locally qualified professionals are not hampered.</p>		<p>continue to improve its capacity and research in this regard</p>
<p>13. Parliament should actively engage in the process of realisation of socioeconomic rights by monitoring and facilitating implementation of legislation, policies and programmes aimed at the progressive realisation of these rights, placing emphasis on designated groups – black people in general, women, and people with disabilities – as well as the poor of all race groups, in the relevant policies and programmes.</p>		
<p>14. Parliament should recommend to the Executive the development of a National Strategic Plan on Gender-Based Violence, which is multi-sectoral, co-ordinated and inclusive, with a strong monitoring and evaluation component to hold all to account and should be fully costed. The Plan should be developed in collaboration with civil society, and should be expanded to include all forms of gender-based violence. Parliament should allocate funding for victim advocacy, criminal enforcement and local capacity to implement the Strategic Plan.</p>		