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**DEPARTMENT OF HIGHER EDUCATION & TRAINING**

Per email: [akabingesi@parliament.gov.za](mailto:akabingesi@parliament.gov.za)

Dear Sir/Madam

**RE: NATIONAL QUALIFICATIONS FRAMEWORK AMENDMENT BILL**

1. We refer to the call for public comments by the Department of Higher Education and Training ("the Department") in relation to the National Qualifications Framework Amendment Bill ("the Bill") under Government Gazette no. 40430.
2. We confirm that initial comments were submitted by Absa dated 15 December 2016 (See attached).
3. The below is a further submission in light of the second draft of the Bill published by the Department.
4. Absa's additional comments/concerns are as follows:
  - 4.1 With regards to section 32 A of the Bill which states that employers must check whether a qualification is registered or not and they are to check this from the learner records database. If the employer does not do so, they will need to refer the qualification to SAQA for verification:
    - In our previous comments enquired about the timelines of such verification as it is still not clear how long SAQA will take to verify a candidate's qualification and to advise the employer on the outcome of such process. The answer to this question is quite important as, depending on what the timelines will be, it may have an impact on our recruitment and on-boarding processes. In addition, when sourcing talent, we compete with a number of potential employers thus turn-around times for the recruitment and the on-boarding process is crucial to the success of the business.



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- In order to balance both the interests of the Legislator and that of the employer, we will need to ensure that the verification system /process can attend to requests both speedily and effectively, given the potential high volumes of requests that the promulgation of this law may create.

4.2 With regards to section 32 A (b) of the Bill which states that should a qualification be found to be fraudulent, such information will need to be reported to the relevant professional body as prescribed:

- In this instance, our request/proposal is that the applicable employer that submits the request for verification also be informed by SAQA of the outcome of such verification as such referral would have been made by the employer in compliance with requirement by the law.

5. Absa is not opposed to the intention of the Bill. We are supportive of implementing punitive consequences for fraudulent qualifications submitted by candidates and unregistered institutions as integrity is a core value of our business.

Yours Faithfully

***Transmitted as pdf attachment***

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