The registration of professional designations on the NQF

A South African Policy Predicament?

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ABSTRACT

South African Qualifications Authority (SAQA) completed the development of and is implementing the Policy and Criteria for Recognising a Professional Body and Registering a Professional Designation for the Purposes of the National Qualifications Framework Act, Act 67 of 2008. The entity has recognised 85 professional bodies and registered 290 professional designations since July 2012. However, this article argues that there is a legal and subsequent policy error related to the registration of professional designations on the NQF. This must be rectified in law and in policy. While professional designations do have a relationship to the NQF by virtue of underlying qualifications, designations in itself cannot be registered on the NQF. However, through another mechanism, the National Learners' Records Database, a separate register for professional designations must be established in order to measure the real impact of professionalisation in contributing to the continuing transformation in South Africa. Addressing unfair exclusionary practices within the professions will require political will and consistency in ensuring meaningful stakeholder participation, academic rigour and investment in ensuring sustainable capacity in regard to systems, people and money.

INTRODUCTION

The South African *National Qualifications Framework (NQF) Act*, Act 67 of 2008 provides for the recognition of professional bodies and the registration of professional designations. More specifically, section 13(1)(i)(i) and (ii) states that SAQA must:

> *develop and implement policy and criteria for recognising a professional body and registering a professional designation for the purposes of this Act (NQF Act), after consultation with statutory and non-statutory bodies of expert practitioners in occupational fields and with the QCs; and*

> *recognise a professional body and register its professional designation if the criteria.....have been met.*

Section 30 of the NQF Act, Act 67 of 2008 further states that:

> *A professional body that is recognised in terms of section 29 must apply to the SAQA, in the manner determined by the SAQA in terms of section 13(1)(i)(ii), to register a professional designation on the NQF.*

The definition of a professional designation provided for in the NQF Act, Act 67 of 2008 and included in the Policy and Criteria for the Recognition of a Professional Body and the Registration of a Professional Designation for the Purposes of the NQF Act, Act 67 of 2008 means:

> *a title or status conferred by a professional body in recognition of a person's expertise and/or right to practice in an occupational field.*

SAQA finalised the policy development process in June 2012 and, as at the end of September 2012, recognised eighteen professional bodies and registered their professional designations. Given the scope and importance of the developments pertaining to professional bodies and professional designations, it is imperative to have a logically coherent position as to what constitutes a professional designation, whether a professional designation is a qualification, what the locus of a professional designation is in relation to the NQF and whether a professional designation ought to be registered on the NQF.

RESEARCH QUESTION AND METHOD

The NQF is a *qualification* (**Q** in NQF) framework. By registering professional designations on the NQF, is it right to assume that a designation is equated to a qualification or that it is in fact a qualification? What are the requirements for a qualification to be considered a qualification and how does a professional designation comply with these criteria or requirements? What is the relationship between professional standards and educational or academic standards and where is the locus of ownership in regard to standards, professional designations and qualifications?

Through a process of qualitative analysis, the development of the professional designation discourse in the context of the NQF is detailed. The author argues that the professional designation is a crucial and much needed development and intervention in the South African NQF landscape. As such, it must be accommodated within the NQF. However, a professional designation cannot and should not be equated to a qualification as it does not meet the basics of the core features or characteristics of a qualification.

WHAT IS NQF?

It is important to at least have agreement as to what constitutes an NQF. The following commonly embraced definition presents a good starting point:

A National Qualifications Framework is therefore taken as a classification system that has its governance located at a national level, often directly or indirectly financed, monitored and managed by government" (Coles 2006).

The UNESCO (2006:23) interpretation closely resembles the above and suggests the following:

The range and diversity of needs which have to be met by a system of qualifications is very great. For individuals trying to use qualifications and for others such as employers who need to understand the qualifications which prospective employees might have, this range and diversity can be daunting. The concept of a national framework is a means of bringing order into the complex world of qualifications.

Section 4 of the NQF Act, Act 67 of 2008 defines or appropriates the South African NQF as:

...a comprehensive system approved by the Minister for the classification, registration, publication and articulation of quality-assured national qualifications.

Cedefop (2008) defines a National Qualifications Framework as:

An instrument for the development and classification of qualifications (e.g. at national or sectoral level) according to a set of criteria (e.g. using descriptors) applicable to specified levels of learning outcomes.

Following from these definitions, it would be fair to state that the normative requirements for a NQF is that it is promoted by government through funding and pursues the creation of a common language or standards relative to qualifications as it sets out the *rules* for classifying and registering qualifications.

According to Raffe (2009), some of the purposes for NQFs are to:
- increase transparency and improve understanding of the education and training system and of its parts;
- promote access, transfer and progression into, within and between programmes of learning;
- provide an instrument of accountability or control of the education and training system;
- enhance the quality of provision, or make it more consistent;
- update, improve or extend standards;
- promote the mobility of labour or of learners;
- make the education and training system more demand-focused, increasing the influence of learners and employers and reducing the influence of providers;
- promote lifelong learning; and
- support wider social and economic transformation.

In terms of section 5(1) of the NQF Act, Act 67 of 2008, the objectives of the NQF are to:
a. create a single integrated national framework for learning achievements;

b. facilitate access to, and mobility and progression within, education, training and career paths;

c. enhance the quality of education and training; and

d. accelerate the redress of past unfair discrimination in education, training and employment opportunities

The outcome or goal of these objectives is "the full personal development of each learner and the social and economic development of the nation at large" (Section 5(2) of the NQF Act, Act 67 of 2008).

In South Africa, the only *pure* objective relating to the NQF is the first one which refers to the creation of a single integrated NQF for learning achievements. The NQF must work in concert with many other policies in order to achieve the other objectives set out in section 5(1) of the NQF Act, Act 67 of 2008. The occurrence or presence of the NQF is offering the State a policy intervention to achieve very specific purposes that includes in its scope issues which transcends qualifications. The NQF serves as an enabling lever in contributing to other socio-political and economic objectives pursued by the State. These are, *inter alia*, redress and transformation, parity of esteem, integration/unification of education and training, quality improvement, various levels of prescriptiveness, vertical and horizontal articulation, mobility, credit accumulation and transfer, recognition of prior learning and, delineation of the roles of quality assurance agencies. In this context, as Raffe (2005, 2012) proposes, an integrated qualifications framework is a framework that "recognises and celebrates a wide range of purposes, epistemologies, modes and contexts of learning, but which also recognises the need to build these into a coherent and coordinated system".

Another example of a qualifications framework being used for more than just qualifications is the European Qualifications Framework (EQF):

> The final example of a framework being used for purposes that lie outside the education and training system is the European Qualification Framework which has its principal aim linked firmly to the Lisbon goal of more and better jobs for all European citizens and the creation of Europe as a top performing knowledge economy (Coles 2006).

The social (cultural and institutional) dimension of introducing an NQF reflects the wide-ranging nature of the changes involved. An NQF provides a new *national language* of learning, to be spoken by users and stakeholders as well as providers. There is a similarly long process of cultural change as programme designs; pedagogies and assessment are aligned with framework criteria and with their underpinning principles. Introducing an NQF involves building trust in qualifications and confidence that they match their descriptions in the framework – for example, that qualifications placed at the same level are indeed comparable (Young 2005, Coles and Oates 2004).

The introduction of an NQF depends on how closely it is supported by wider social and economic factors given the changes in the workplace and in employers' demand for qualifications, the changing patterns of social and occupational mobility and the extension of market principles and of neo-liberal ideas (Allais 2003, Phillips 2003). The *intrinsic logic*' (inherent rationale) of a qualifications framework may promote *seamless* access, credit transfer and progression through the modular system; but in practice, participation and

progression continued to be determined by *institutional logics* associated with educational institutions and the wider social context (Raffe, 1998). Parity of esteem, and patterns of participation and attainment in learning, are shaped more by the institutional logics of education and training (including macro-institutional logics: Young 2002) than by the intrinsic logic of an integrated qualifications framework. When viewed and understood from this perspective, the imperative of the NQF as a social construct is even more vexing. The dual interplay between intrinsic logic and institutional logic requires social society to not only theorise about, construct and implement the NQF, but also to enable, activate, change or work against the NQF (Isaacs, 2012).

WHAT IS A QUALIFICATION?

Section 1 of the NQF Act, Act 67 of 2008 defines a qualification as "a registered national qualification".

In the EQF (2010), a qualification is defined as "a formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards."

Moon (2006), writing from a higher education perspective, stipulates a qualification (such as a Bachelor's degree) to be a programme with most programmes being broken up into smaller units that are assessed within the programme. The term *modules* or *courses* are used to denote the unit. Modules are accredited (credit is attributed to a module) at a particular level. The amount of credit attributed to a module is based on the amount of learning needed to achieve learning outcomes in the given time.

The SAQA Policy and Criteria for the Registration of Qualifications and Part-qualifications on the NQF (2013) defines a qualification as:

> a planned combination of learning outcomes which has a defined purpose or purposes, intended to provide qualifying learners with applied competence and a basis for further learning and which has been assessed in terms of exit level outcomes, registered on the NQF and certified and awarded by a recognized body.

Reading these different definitions, it would appear that qualifications are designed and organised according to levels, subject to formal level descriptors, which are expressed in terms of learning outcomes with credits assigned to each of the units constituting the qualification. The fact that qualifications are referenced to a level implies a quality assurance imperative and thus the need for accreditation. With the accreditation requirement, comes the criteria of assessment – demonstrate that the learning outcomes do in fact match the generic level descriptors for the appropriate level on the framework. Another feature of a qualification is that it allows someone to "graduate". In the South African context, SAQA, under the NQF Act, Act 67 of 2008, registers qualifications on the NQF on the recommendation of the Quality Councils – Council on Higher Education, Quality Council for General and Further Education and Training (Umalusi) and the Quality Council for Trades and Occupations – with qualifications having been designed by providers (in the case of higher education) or

task teams or consultants – Qualification Development Facilitators (in the case of the trades and occupations sector).

PROFESSIONAL DESIGNATIONS AND THE NQF: THE SOUTH AFRICAN STORY

The genesis of the professional designation debate and subsequent inclusion of it on the NQF can be traced to 2005 when SAQA initiated and commissioned research on all qualifications registered at the time as *professional* on the South African National Qualifications Framework (NQF). The research resulted in a report entitled *An investigation into the inclusion of qualifications currently registered as professional on the NQF*, and was completed in December 2005.

Of the professional bodies interviewed during the research, it was found that:

- 87% of respondents required an academic and workplace component in order for candidates to meet their registration requirements and 69% required a qualification holder to be professionally assessed or examined prior to registration;
- The vast majority of respondents relied heavily on annual registration fees as the major source of income and failure to pay fees usually resulted in a member forfeiting their registration (96%);
- 87% had a Code of Ethics that must be adhered to in order to retain professional status/registration which was common practice even amongst non-statutory bodies, whose members did not necessarily have to operate under 'licence'; and
- Whilst there were some bodies that did not impose continual professional development (CPD) requirements, 69% had addressed this issue in one way or another. Most had not yet introduced compulsory, monitored CPD, but several have indicated that this was the way they were planning to go.

There appeared to be at least four models of professional pathways to registration. The typologies are:

- Model A – the specialist academic component was delivered at a public education institution, sometimes with further specialist (post-graduate) requirements; workplace experience was required and; formal assessment of professional competence was done by the professional body.
- Model B – a related qualification was accepted for the academic component; practical experience was assessed via a portfolio of evidence (POE) and; no formal assessment of professional competence existed.
- Model C – the specialist academic component was delivered via a private provider; practical experience was assessed via a portfolio of evidence (POE) and; formal assessment was undertaken by the professional body.
- Model D – the professional body offered its own specialised qualification, including a practical component (mostly workplace) with formal assessment.

Three steps to professional status were identified:

- professional qualification (often in two stages, namely an academic/theoretical stage and a workplace experience stage);
- assessment for professional registration; and
- ongoing retention of registration by professional members through Continuing Professional Development (CPD) and adherence to the Code of Ethics/Conduct.

The illustration below depicts the professional pathway:

In summary then, there appears to be broad consensus that the elements for professionalisation includes:

- completing the qualification: this contains the theoretical learning, including applied competence, but with limited occupationally directed learning;
- completing workplace-based experience: this is at the core of occupationally directed learning and sometimes it can be part of a qualification in the form of work integrated learning, but more often is non-formal training;
- registering with a professional body: the award of a professional designation and given the right to practise; usually subject to some form of professional assessment; and
- retaining professional status: must adherence to the requirements of the particular professional body. Requirements would include CPD, code of conduct (ethics), continuing engagement in the practice of the profession and payment of fees.

Figure 1: Stages towards obtaining and retaining professional status
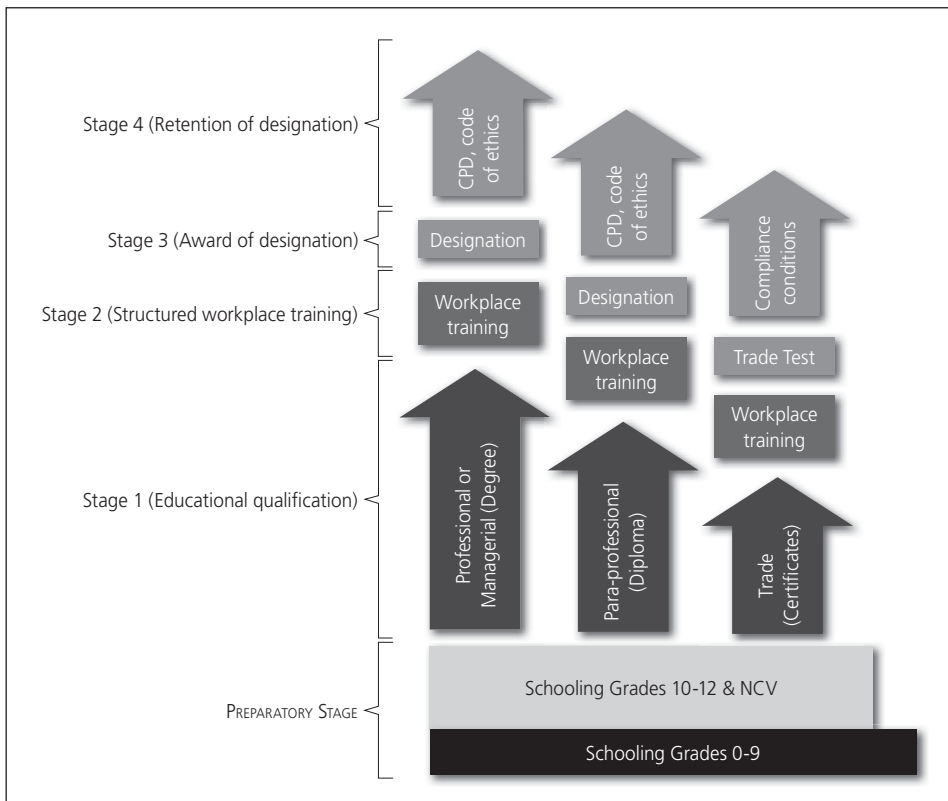
The research served as the basis for the establishment of a SAQA Review Panel in late 2006. This Review Panel was tasked to:

- review the recommendations of the empirical research on the inclusion of professional qualifications on the NQF in the light of the responses received from stakeholders;
- conduct a workshop with stakeholders explaining the final position of the Review Panel; and
- recommend for SAQA's consideration whether to include professional qualifications on the NQF, and matters related thereto.

The Review Panel agreed that the awarding of the professional designation or professional title was the product of a separate competency assessment process to that of a professional qualification and that the applicant, irrespective of the route followed, must demonstrate competency against the standards prescribed for registration. Thus, the candidate must adhere to professional registration standards. This assessment was de-coupled from any programme followed by the applicant and was performed exclusively by the profession or by a body accredited by the profession.

A second issue on which the panel agreed was the fact that unlike a professional qualification, a professional designation could be withdrawn or revoked and the professional body needed to be in control of registration, licensing and regulating practice.

On the issue of ownership, the panel agreed that a statutory profession owned a designation because it was established in law. A non-statutory profession owned a designation because the public accepts that a non-statutory body was the custodian of its interests. A qualification was owned in various senses by the Standards Generating Body (SGB), the ETQA body – SGBs and ETQAs were structures established under the SAQA Act, Act 58 of 1995 – that uses it to accredit qualifications and the NQF who registers it. Qualifications, under the NQF Act, are owned by the Quality Councils. Further, CPD did not necessarily involve the award of qualifications.

Based on the research report and comments originating from the public, the Review Panel recommended that:

- The attainment of a professional qualification does not in itself automatically lead to a professional designation. Professional qualifications registered on the NQF must be quality assured under an arrangement involving the relevant ETQA (now Quality Council) and professional body. Unlike a professional designation, a professional qualification may not be revoked.
- Professional designations must not be included in the NQF. Professional bodies are, however, encouraged to publish the standards for professional competency in a form that supports the NQF objectives of integration, coherence of education and training requirements, articulation and portability.

In meetings between a SAQA Professional Qualifications Task Group, comprising SAQA Authority (Board) members and staff, and the SAQA Review Panel for Professional Qualifications in mid-2007, the following crucial points were raised:

- the Review Panel's recommendation to exclude professional designations from the NQF needed to be substituted with the need to develop a specific form of registration of designations; and

- a policy needed to be developed regarding the registration of professional designations which do not compromise the relevant profession's responsibility to protect the public interest through registration, licensing and so forth.

It is clear that these developments – the SAQA research, review panel and SAQA professional qualifications task group – culminated in what was eventually captured in the NQF Act, Act 67 of 2008; the inclusion of professional bodies and professional designations as part of the NQF genetic structure, albeit leading to some confusion insofar as the registration of professional designations was concerned. What has also transpired is that what emerged as a discussion on professional qualifications and its registration on the NQF, evolved into a discussion and enshrining in NQF legislation the nature and status of professional designations. This, in one way, may point to the opaque nature of the NQF by conflating professional qualifications with professional designations. In another way, it may also have been the result of the broad and all-encompassing scope of the NQF as illustrated by its objectives, namely, that it is more than just qualifications in its pursuit to "contribute to the full personal development of each learner and the social and economic development of the nation at large". Recognition of professional designations also contributes to the aim of NQFs as instruments of lifelong learning.

Table 1: Inherent Features of Qualifications and Professional Designations

Qualification	Professional Designation
Cannot be revoked (unless evidence is presented of having obtained the qualification through fraudulent means)	Can be revoked
Awarded by an educational institution or provider	Awarded by a professional body
Licence of knowledge	Licence to practice
No need to maintain	Must be maintained through: • CPD • Code of Ethics • Professional Fees
Academic discipline is the focus	Profession is the focus
Does not necessarily lead to a profession	Qualification is a prerequisite
"Owned" by the individual	"Owned" by the profession
Experiential or practical learning not part of every qualification	Experiential or practical learning is a prerequisite
Linked to a NQF level	Not linked to a NQF level
Learning outcomes – independent of the site, the form of provision and the type of pedagogy and curriculum through which they may be achieved	Professional outcomes – scope of practice and professional competences
Based on credits to get the qualification	Not based on credits
Credits obtained in one qualification can be used towards another qualification	Professional designations cannot be transferred between professions

A COMPARATIVE UNDERSTANDING

Having considered the discourses regarding qualifications and professional designations in the NQF context, some of the key features of these different "NQF award types" as set out in Table 1, are suggested as a means of differentiating between the two awards:

CONCLUSION AND RECOMMENDATIONS

Registration of professional designations on the NQF has created a situation of policy incongruence and cannot be justified. Notwithstanding this, section 13(1)(l) of the NQF Act, Act 67 of 2008, provides for the National Learners Records Database to comprise a register for professional designations, just not on the NQF. The purposes and objectives of the South African NQF leads one to the logical conclusion for such registration. In its broadest sense, the NQF – given the historical and current realities of South African society – must facilitate access in its widest sense, enhance quality and accelerate the redress of past and unfair discrimination in developing both the individual and the economic and social fabric of society in respect of education and training. The professional landscape cannot be exempted from this transformation imperative of society.

However, it would be an anomaly to equate a professional designation to a qualification. The inherent or intrinsic features of the two types of award differ substantively (see Table 1). It would seem that in the early discussions about professional registration, there was confusion in respect of professional *qualifications* and professional *designations*. While professional qualifications should be registered on the NQF, it was not so clear with regard to professional designations. In light of what may seem like obfuscating diatribe, it is the writer's conclusion that professional designations are part and partial of the education and training landscape and as such must be accommodated on the NQF. However, in recognising the transformative nature of professional designations, the following is recommended in an attempt to ensuring coherency and alignment of professional designations within the NQF:

Recommendation 1

Professional designations and qualifications have different design features. Professional designations are not qualifications. The NQF is a *qualifications* framework. As such, professional designations do not comply with the conventional notions of a NQF – for example credits, levels and level descriptors. **It is therefore recommended that a separate register for professional designations be developed and managed by SAQA**. This is provided for in the section 13(1)(l) of the NQF Act, Act 67 of 2008 and will contribute to ensuring that the broader objectives (primarily those with a transformation focus) of the NQF will not be compromised.

Recommendation 2

The NQF Act, Act 67 of 2008, must be amended. Section 13(1)(i)(i) mandates SAQA to develop policy and criteria for registering professional designations **for the purposes of the**

NQF Act. This section correctly asserts the relationship between the NQF and professional designations. However, this logic is not carried through as section 30 invokes the principle to register professional designations on the NQF. Section 3(2) sets out the imperative to register qualifications and part-qualifications on the NQF, but omits the registration of professional designations. It would appear that the legal drafters were also not convinced of the need to register professional designations on the NQF, which was unfortunately not carried through to section 30 of the same Act. Professional designations have a relationship with the NQF through the underlying qualifications, but should not be registered on the NQF. **It is recommended that section 30 of the Act be amended to read; "….to register a professional designation for the purposes of the NQF Act."**

Finally, as articulated by the founding Chairperson and CEO of SAQA, Samuel Isaacs; "the effectiveness of the NQF as a social construct requires three conditions to be present: democratic participation, intellectual scrutiny and adequate resourcing." While SAQA has completed the development of and is implementing the *Policy and Criteria for Recognising a Professional Body and Registering a Professional Designation for the Purposes of the National Qualifications Framework Act, Act 67 of 2008*, recognised 85 professional bodies and registered 290 professional designations since July 2012, the real impact of professional designation registration in contributing to the continuing transformation of South African society is only likely to be evident in the years to come. This will require political will and consistency in ensuring meaningful stakeholder participation, academic rigour and investment in ensuring sustainable capacity in regard to systems, people and money.

NOTES

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