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CRITERIA AND GUIDELINES FOR THE IMPLEMENTATION OF RECOGNITION OF PRIOR LEARNING

DISCUSSION DOCUMENT FOR PUBLIC COMMENT

This document was approved for release as a discussion document for public comment at the EXCO meeting of 07 May 2003.

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The closing date for comments is 30 June 2003.

Submissions should be titled:

Criteria and Guidelines for the Implementation of Recognition of Prior Learning.

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CRITERIA AND GUIDELINES
FOR THE IMPLEMENTATION OF
RECOGNITION OF PRIOR LEARNING

Discussion document

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Please note:
This discussion document has not been edited and layout has not been done. This document is a draft for public comment. It will be put through a rigorous process of editing and layout after public comments have been considered and incorporated.

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EXECUTIVE SUMMARY

In the concluding chapter of the SAQA policy: *The Recognition of Prior Learning in the context of the South African National Qualifications Framework* (2002), a broad strategic framework for implementation of RPL is proposed. The six steps highlighted as part of the strategic framework in Chapter 3 of the policy, and the core criteria for quality assurance (Chapter 2), while useful in themselves from a quality assurance point of view, do not expand sufficiently on those aspects which could help providers of education and training and their constituent ETQAs to implement RPL, particularly as they relate to the contexts impacting on a sector. This document seeks to address the need for guidelines in the implementation of RPL.

This document utilises the six steps and the core criteria for quality assurance as captured in the SAQA RPL policy to develop an implementation guide. The six steps are:

1) An audit of current practice
2) The development of detailed sector-specific plans
3) Capacity building of resources and staff
4) The design and moderation of appropriate assessment instruments and tools
5) Quality management systems and procedures
6) The establishment of a research base

In addition, this document will incorporate examples from international and national case studies on the approaches, pitfalls and best practices that have emerged in RPL practice.

The target audience for this publication is providers of education and training. However, this does not mean that providers should not and will not engage in critical debates with their constituent ETQAs. Ultimately, the ETQAs will, through their quality assurance processes, be responsible for the protection of the integrity of the system as a whole and must ensure the sustainability of their RPL systems. ETQAs must therefore take the lead in the discussions, particularly to ensure that quality assurance is accorded high priority for all RPL processes.

This document also contributes to the critical debates on the transformation of our assessment practices, not only for RPL, but also for teaching and learning practice in general. The broader purpose is to develop assessment systems and practices that are more responsive to the needs of learners, curricula and contexts.

This discussion document adheres to the following SAQA documents in a logical sequence:

- *Criteria and Guidelines for Assessment of NQF registered Unit standards and Qualifications;* and
- *The Recognition of Prior Learning in the context of the South African National Qualifications Framework*

Other relevant documents include:

- *Criteria and Guidelines for ETQAs*
- *Criteria and Guidelines for Providers*

Structure of the document

Chapter 1:   Making a start: An audit of current practice
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Conclusion

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, it could serve as a useful baseline of 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 implementation of RPL processes and assessment.

These include and investigation into:
- Access and admissions directives from relevant authorities;
- Current regulations with regard to entry into HE and the extent to which there may be dissonance between RPL principles and such regulations;
- Current regulations with regards to the awarding of credits towards qualifications and the extent to which these impact on the principles of RPL;
- 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 the following issues:
- 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 Admissions

Looking at **current practices** in terms of **access and admissions** 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 have been 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 admissions 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 for admission to suitable programmes by means of proof of equivalent learning through experience; and
- 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 for being 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 should be recognized for credits. In the context of **access and admissions 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 or admittance to a programme (Heyns,2003:). The New Academic Policy (CHE, 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 at least a National Senior Certificate.

Recognition of Prior Learning suggests that where a candidate can provide evidence of **sufficient and current learning** as associated with a matriculation level learning, a provider could (to continue with the higher education example), grant access or credits to such a learner based on the evidence[1].

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 refer to 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 admissions policies must be addressed. If not, learners accessing education and training via RPL will remain on the periphery of the system. Also, in keeping with the RPL principle that a learner can 'in part or wholly' achieve a qualification through recognition of prior learning, 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, must be 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 1996 census whereby it becomes clear where it is critical to start implementing RPL:

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

- 6,2% have education level above grade 12;
- 16,4% have grade 12;
- 33,9% have some secondary schooling;
- 7,5% have completed primary schooling;
- 16,7% have some primary schooling; and
- 19,3% have no schooling.

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[1] 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, 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 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 of having passed matric.

The 33,9% and 16,7% of people 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 practices 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
- 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 it 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 such a programme with the institution regardless of whether the credits granted exceed 50 % of the requirements, or even fulfill all the requirements of the qualification. This has become particularly evident from providers of education and training who doubt **the academic skills** of candidates accessing 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 – 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 based on the fear of institutions that there will be a drop in standards. The important point to make here is that it is the institution who assesses the candidate and who should be satisfied, in every respect, that the candidate meets the necessary requirements. 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 (more about assessment and the quality assurance thereof later).

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 this is not the responsibility of 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 could take place.

However, 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 must 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 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 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 problematical because administrative systems were developed for and are geared to award credits towards subjects/modules. Implementers of RPL must identify clearly which composite parts will make up the attainment of an outcome and the administrative system should be able to capture and transcribe such credits (Heyns, 2003:).

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 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 'ISO9000' 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.

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 from the NSF, specifically for unemployed candidates. Discussion with DoE and 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.

- 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 Centers have been set up and 11 000 people have undergone the first phase of the process.

The NSF is often targeted as a resource for a range of projects. From the examples of current practice 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 New Academic Policy (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 Department of Education. 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.

It therefore does not deal with subsidies for RPL learners who may wish to access higher levels of the NQF. It also does not 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 implement RPL across all levels of the NQF.

1.5 Costing, and Comparative Studies

The RPL policy 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" (RPL policy, chapter 2).

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 fees candidates are required to pay;
- Decisions about what to charge for, for example time spent on the service and assessment; a common fee regardless of the amount of credits claimed and the work required to complete the process; a fee in relation to number of credits claimed, are all possibilities.

High Start-up Costs

This guideline document makes it clear that there are many important considerations that have to be taken into account when an 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.

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 it becomes institutional practice and from these lessons learnt, to 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 percentage of delivery. Such providers are not eligible for subsidies and care should therefore be taken that RPL does not become too costly for the individual.

It should however, 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 directed by it. (more about planning in chapter 2.)

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, for example:

If a National Certificate (120 credits) takes an average of 1200 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 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;
ii. A common fee irrespective of time spent or the number of credits awarded;
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 and 10), developed criteria for the Council for Adult and Experiential Learning (USA) which 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' when "basing 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 looking only at 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 off-set 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, 2003:3).

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 SGBs and 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 curriculae 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 incorporate 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 purpose 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 less in-house, individual costs needs to be incurred – these are shared between the members. It 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 mobilize more significant strategic strength than being on their own.

(Strydom, 2002: 31 and 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 transfer of credits is greatly facilitated
- Agreement of the level(s) and the minimum requirements for candidates seeking credits for particular qualifications
- Quality assurance is agreed and conducted in a coherent fashion.
- Institutional autonomy remains 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 following:

- o The perceived lack of reformatted qualifications, i.e. qualifications developed in accordance with Outcomes-based Education principles
- o Absence of registered assessors
- o Delays in the accreditation of education and training providers

Reformatted Qualifications in terms of OBE Principles

It should be noted that all qualifications currently registered on the NQF, in order to be interimly registered, had to be submitted in OBE format. This required that each qualification should have at least a purpose statement, learning outcomes and associated assessment criteria, as well as articulation possibilities, international comparability and moderation options. It also required a statement about how recognition of prior learning may be effected 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 fully registered, and that such registration is valid until June 2006. (SAQA decision number 1043/02). From June 2006, all qualifications currently registered on the NQF, must be fully compliant to OBE principles.

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 accessible 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 identified through a process of RPL, that are needed to achieve the qualification. Unit standards are nationally agreed descriptions of the results of learning, and credit transfer between different providers are 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 thereby facilitated.

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 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 is based on subjects and modules, rather than on the specified outcomes of the qualification, not only the process of credit transfer is inhibited, but also the implementation of RPL against the requirements for the qualification, i.e. the descriptions of the results of learning (the outcomes of the qualification – refer to the discussion under section 1.3) (Heyns, 2003).

The New Academic Policy 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 regards to their own possible biases towards candidates and the processes required to assess such candidates. This will be discussed in Chapter 3.

The delays in the accreditation of education and training providers

Private providers in particular, are finding the delays associated with their accreditation, limiting when planning to implement 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 private providers should be a priority for ETQAs.
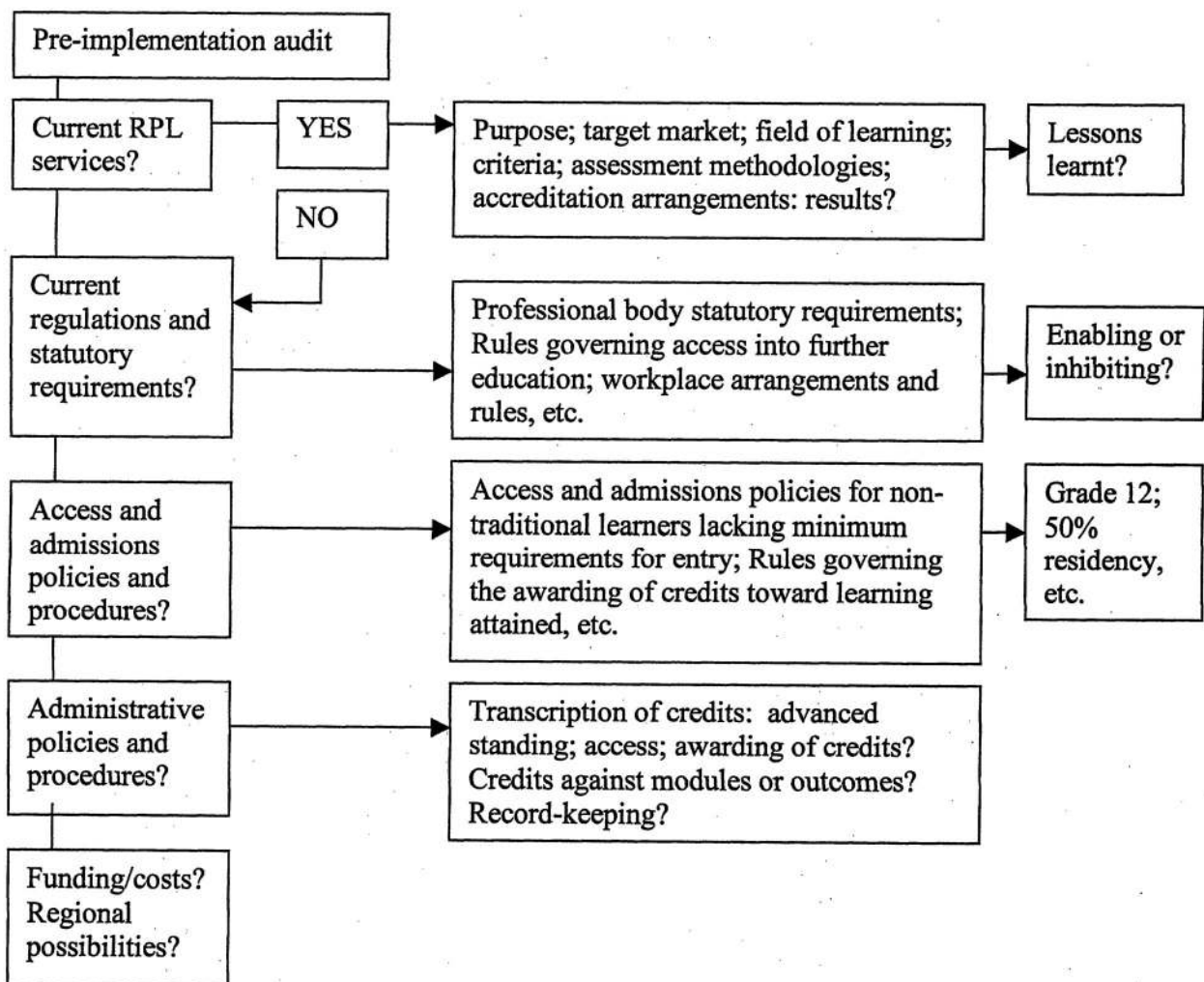
Summary

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 sensitize 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 role players in the organization, including the management and executive of the organization. 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 could 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 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:

- o "set minimum criteria for automatic admissions into different academic programmes; and
- o establish selection processes to determine the suitability of applicants who do not meet these minimum criteria".

To conclude, the following diagram may be helpful in embarking on an audit of current practice:

Pre-implementation audit

Current RPL services?	YES →	Purpose; target market; field of learning; criteria; assessment methodologies; accreditation arrangements: results?	→	Lessons learnt?
NO ↓				
Current regulations and statutory requirements?		Professional body statutory requirements; Rules governing access into further education; workplace arrangements and rules, etc.	→	Enabling or inhibiting?
Access and admissions policies and procedures?	→	Access and admissions policies for non-traditional learners lacking minimum requirements for entry; Rules governing the awarding of credits toward learning attained, etc.	→	Grade 12; 50% residency, etc.
Administrative policies and procedures?	→	Transcription of credits: advanced standing; access; awarding of credits? Credits against modules or outcomes? Record-keeping?		
Funding/costs? Regional possibilities?				

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

CHAPTER 2:
PLANNING - THE DEVELOPMENT OF
SECTOR/CONTEXT-SPECIFIC PLANS

Introduction

Chapter 2 of the guideline document deals with the planning of RPL initiatives on a macro and micro level, i.e. at the level of the ETQA in conjunction with its constituent providers, and at the level of the provider[2].

Purpose of this chapter

As the title suggests, this chapter intends to highlight the need for ETQAs and their constituent providers to critically engage with the planning of RPL on a national, regional and institutional level. At this point it is important for ETQAs and their providers, including workplace-based and SMME providers, to agree on:

- The criteria for quality assurance of RPL within the sector;
- The targets (over time) for implementation within sectors; and
- The partnerships and collaboration that may need to take place in order to implement.

In terms of the planning, the following will be addressed:

- Policy and procedural development, including the documentation of quality assurance processes;
- Establishment of the purpose and intended outcomes of RPL within the sector and provider, i.e. access, placement, advanced standing, formal certification, or a combination of these;
- Identification of and establishment of a target area (field of learning) and the level, for example under-graduate, post-graduate, FET, etc.;
- Identification of a target market, i.e. the unemployed, under-qualified practitioners; candidates without formal entry requirements, workplace based candidates, etc.; and
- The support structures required (candidates and staff), for achieving the aims of the sector and institution.

In addition, based on the context, planning for:

- Articulation and learning pathways and the administrative processes capable of dealing with credit transcription and transfers;
- Review and moderation of assessment processes and tools, i.e. the nature and extent of quality assurance, the frequency of moderation and methodologies;
- Principles of assessment, i.e. weighting of evidence in relation to the qualification and level.
- The flexibility of entry and exit points

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[2] The term 'provider' is used in accordance with the official understanding of an education and training provider, i.e. "a body who delivers learning programmes which culminate in specified National Qualifications Framework (NQF) standards or qualifications and manages the assessment thereof".

The planning process will be incomplete if planning does not also incorporate the identification and costing of:

- Person-hours;
- Staff development, including administrative and support staff;
- Infrastructure; and
- Assessor/moderator guides
- Short term plans, including target numbers and groups
- Roll-out plans and planning for lobbying of funds and resources

2.1   Policies and procedures: An enabling environment

Establishing an enabling environment suggests a structure that will facilitate the development and implementation of RPL. In the words of the RPL policy (Chapter 2):
"Unless proper policies, structures and resources are allocated to a credible assessment process, it can easily become an area of contestation and conflict".

This sentiment also emerges from a number of international approaches. For example, Urban Whitaker (1989: 9 and 10) states that even at the level of the learner: "Policies and procedures applied to assessment, including provision for appeal, should be fully disclosed and prominently available".

Policies and procedures give legitimacy and structure to a process. This does not mean to say that policies should be rigid, but that it will encourage would-be implementers of RPL to be very clear on the intended purpose and outcomes of the initiative.

The self-audit tool from the SAQA RPL policy document highlights this as follows:

INSTITUTIONAL POLICY AND ENVIRONMENT		
There is a shared commitment on the part of ETQAs, accredited constituent providers and workplaces to provide enabling environments for learning and assessment (inclusive of close cooperation between administration, learning facilitators, evidence facilitators, advisors, assessors, moderators, professional organizations, employers, trade unions and communities, where appropriate)		
	Yes	No
The assessment policy expresses an explicit commitment to the principles of equity, redress and inclusion		
The assessment policy reflects planning and management in accordance with relevant legislation and policy		
Information about assessment opportunities and services are widely available and actively promoted		
Admission procedures and systems are accessible and inclusive of learners with diverse needs and backgrounds		
Equal access to opportunities to advice, support, time and resources for all candidates seeking assessment		
Organisational structures ensure that evidence facilitators, assessors and moderators and other key personnel, such as advisors, are given sufficient support, resources and recognition for their services		
Regional integration and collaboration are encouraged among		

institutions, professional bodies and workplaces, where possible		
Formal agreements between ETQAs, providers and workplaces are encouraged to ensure effective validation, articulation and recognition of assessment results, where possible		

There is a clear indication, in the opening statement of the self-audit tool above, that providers and their constituent ETQAs must have aligned policies and procedures. Also, that such policies should be in line with the SAQA RPL policy and that the policy should incorporate all the activities surrounding RPL. Policies and procedures should be clearly spelt out, based on the principles of equity of access and redress and should be inclusive of non-traditional learners wanting to enter education and training. The message of such a policy is therefore that there is **an institutional 'will' to open up access** to learners coming from diverse background, displaying diverse needs and capabilities.

The development of policies and procedures is therefore a very important phase in planning for RPL. A policy should clearly state:

2.1.1   The purpose of RPL within the sector.

The purpose could include **access** and appropriate **placement** at a particular level at the institution, granting **advanced status, advanced standing, crediting** and **certifying** learners for the parts of the qualification where all the requirements have been met, or depending on the context, a combination of these. It should also be noted that the NSB Regulations makes is clear that a learner could achieve a qualification in part or wholly through the process of RPL.

The following descriptions for the abovementioned options may be helpful:

Term	Description
Access	To provide ease of entry to appropriate level of education and training for all prospective learners in a manner which facilitates progression
Placement	To, through a diagnostic assessment, determine the appropriate level for learners wanting to enter education and training
Advanced status	To grant access to a level of a qualification higher than the logical next level following on the preceding qualification
Advanced standing	To award credits towards a qualification for which a candidate has registered.
Credit	To award formal, transferable credits to the learning that meets the requirements of the part or full qualification
Certification	To, for purposes of a qualification, certify credits attained

The purpose of RPL within a particular sector, would be closely linked to:

2.1.2   The target market and target area

The target market refers to those candidates that the institution and/or its ETQA, wants to attract. (In the Faculty of Education, for example, the target market may be under-qualified teachers.) The target market could be

determined in a number of ways – the Sector Skills Plan (SSP) may inform the process either in terms of a "redress"-approach or a "critical shortage of skills"-approach. The Services SETA, for example, identified a need for RPL with domestic workers against a newly developed qualification in this area.

2.1.3　Support structures

Support structures are required at different levels. At the level of the ETQA it may require support to their constituent providers wanting to implement RPL. The benefits of support at this level are twofold:

- Enhancing an understanding of the quality assurance requirements as established by the ETQA for the implementation of RPL; and
- Developing a common interpretation of the requirements for evidence for the unit standards and qualifications. The transferability of credits between constituent providers will be facilitated through such an approach.

Also, education and training practitioners may need particular support structures, where they can critically engage with their proposed methodologies and tools, thereby ensuring that there is consistency in the interpretation and assessment of learning. The internal moderation function of the provider/institution have an important role to play in this regard, particularly in ensuring that the internal processes are in line with the requirements of the ETQA. This also supports the development of a cadre of RPL specialist practitioners.

Further, depending on the sector and target market, the level of support required by RPL candidates must be determined. Care workers in Early Childhood Development for example, may need much more support in the collection and presentation of evidence in relation to a qualification, than a graduate who wishes to access a Master's programme.

2.1.4　Quality assurance

How, when and the kinds of quality assurance interventions should also be spelt out in the policy and procedures dealing with assessment and RPL. The ETQA should give direction and guidance as to how their constituent providers/institutions could meet the agreed quality assurance criteria. During the planning stage, these quality criteria must be established in conjunction with constituent providers/institutions. Quality assurance should not be an add-on, but integral to the planning of the initiative. The provider/institution will plan their quality assurance cycles, including the moderation at various stages of the process, in accordance with these requirements.

The following example of a 'generic' template for an RPL policy is a combination of a number of ETQA RPL policies. Such a policy could contain the following headings:

Recognition of Prior Learning Policy

1. *Objective*
   For example: *This policy covers the process of gathering evidence and making judgements about a learner's performance in relation to standards and qualifications. The policy outlines the process whereby such evidence is assessed and credited.*

2. *Scope*
   For example: *The assessment of learning is a service available to all learners who have appropriate learning and skills in relation to qualifications for which this institution is accredited, regardless of where and how the learning was obtained.*

3. *Legislative context*
   For example: *The SAQA Act, NSB Regulations, Skills Development Act*

4. *Principles of Assessment*
   For example:
   All assessments are subject to the following principles:
   - *Validity*
   - *Fairness*
   - *Reliability*
   - *Practicability*

5. *Criteria and Registration of Assessors*
6. *Support Structures for Learners and Assessors*
7. *Process of Assessment*
8. *Moderation and quality assurance*
   For example: *Assessment instruments will be moderated by learning area specialists before assessments take place. 10% of completed assessments will be moderated for consistency, fairness and reliability.*
9. *Procedures for Appeal*
10. *Certification of Learners*
11. *Articulation of learning*
12. *Record-keeping*

Extracts from the Victoria University of Technology's policy and procedures (Melbourne, Australia), indicate what such a policy may look like (Fleet, W. 1997: 36 –39, in Harris, J. 2000: 150 - 153):

Victoria University
Recognition of Prior Learning
Policy and Procedures

1. Purpose

The purpose of this policy is to provide a framework for the implementation of Recognition of Prior learning procedures within the TAFE and higher education sectors of Victoria University of Technology

2. Definition of Recognition of Prior Learning

Recognition of Prior Learning (RPL) is the acknowledgement of skills and knowledge already acquired by a person from work and/or life experience or from previous study. This prior learning may include:

2.1 Courses provided by professional bodies, voluntary associations, enterprises, private educational institutions, trade unions, government agencies and/or other providers

recognised by a university.

2.2　Work or other forms of practical experience; and

2.3　Life experience

3. Policy

When selecting students for admission, the University takes into account the wide variety of backgrounds and learning experiences of the applicants. Students undertaking courses at Victoria University of Technology may be eligible to have this prior learning and experience recognized.

The Faculty/School will determine where RPL is available.

4. Authority and Scope

This policy has been developed to enable the Victoria University to implement the university's objectives in relation to the Recognition of Prior Learning.

4.1　This policy does not apply where formal credit transfer arrangements have been established

4.2　Eligibility for RPL Assessment does not guarantee an applicant a place in the course.

5. Procedures

5.1　The procedure for the assessment of prior learning as the basis for credit in a course offered by the University is determined by the schools/faculties.

5.2　Dissemination of information

5.2.1　Information on the University's Recognition of Prior Learning policy and procedures will be made available to students through:
- o　the faculty handbooks;
- o　the publication of a university brochure on RPL

5.5　Right of appeal

5.5.1　Applicants who are either denied RPL or who wish to challenge the amount of credit given from RPL may request further consideration. Such appeals must be filed within 10 working days of issue of the notification of the outcomes of the assessment.
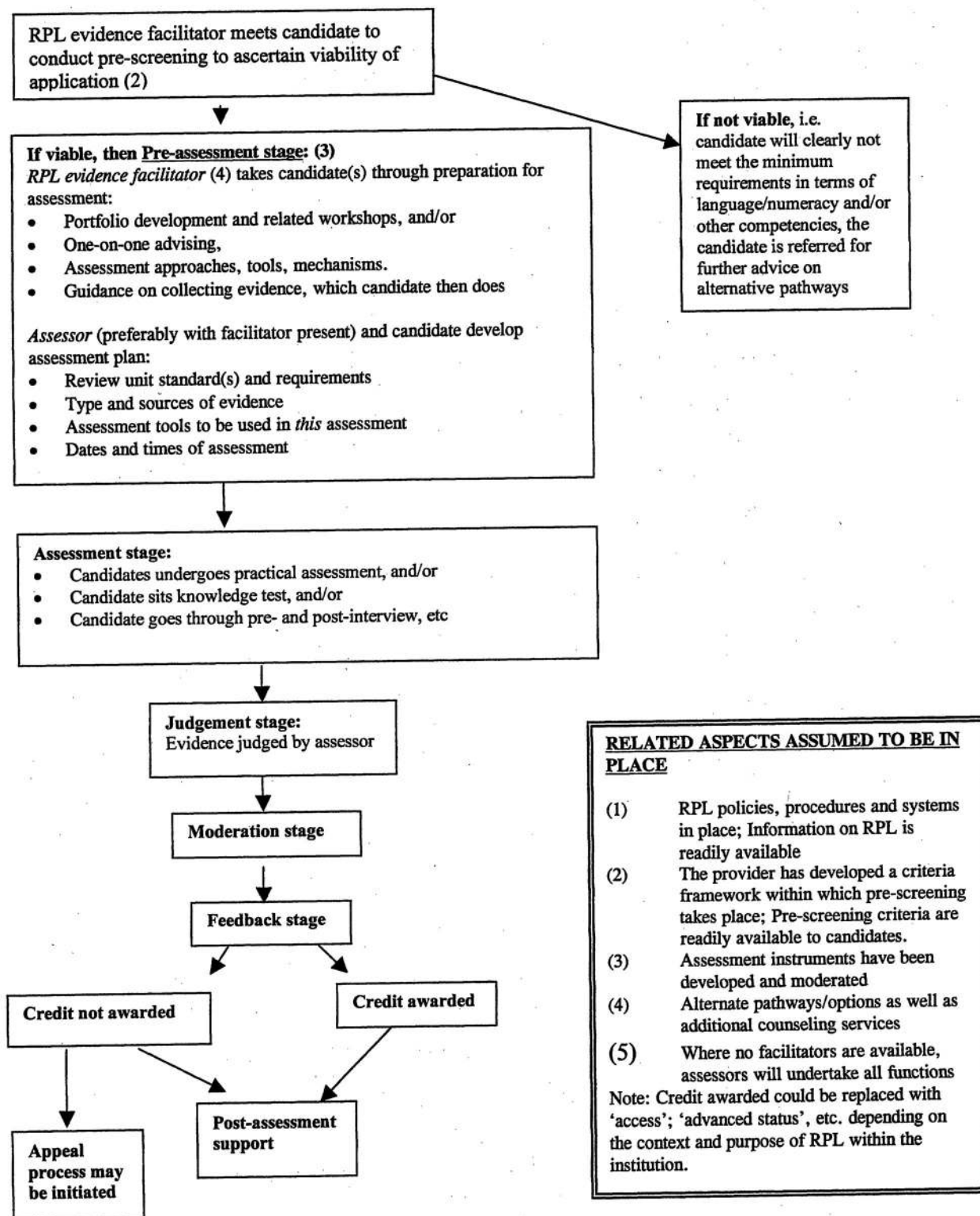
6. Fees

Any fees applicable to RPL assessment will be determined through the University standard processes.

7. Monitoring

This policy will be monitored as part of the University's Undergraduate and Coursework Programmes Committee.

2.1.5　Procedures

A policy is only as good as its implementation. The RPL policy should therefore be followed by clear procedures. The generic RPL process in the SAQA RPL policy is a good example of what such procedures could consist of:

A generic RPL process:

RPL evidence facilitator meets candidate to conduct pre-screening to ascertain viability of application (2)

If not viable, i.e. candidate will clearly not meet the minimum requirements in terms of language/numeracy and/or other competencies, the candidate is referred for further advice on alternative pathways

If viable, then Pre-assessment stage: (3)
RPL evidence facilitator (4) takes candidate(s) through preparation for assessment:
- Portfolio development and related workshops, and/or
- One-on-one advising,
- Assessment approaches, tools, mechanisms.
- Guidance on collecting evidence, which candidate then does

Assessor (preferably with facilitator present) and candidate develop assessment plan:
- Review unit standard(s) and requirements
- Type and sources of evidence
- Assessment tools to be used in *this* assessment
- Dates and times of assessment

Assessment stage:
- Candidates undergoes practical assessment, and/or
- Candidate sits knowledge test, and/or
- Candidate goes through pre- and post-interview, etc

Judgement stage:
Evidence judged by assessor

Moderation stage

Feedback stage

Credit not awarded

Credit awarded

Appeal process may be initiated

Post-assessment support

RELATED ASPECTS ASSUMED TO BE IN PLACE

(1) RPL policies, procedures and systems in place; Information on RPL is readily available
(2) The provider has developed a criteria framework within which pre-screening takes place; Pre-screening criteria are readily available to candidates.
(3) Assessment instruments have been developed and moderated
(4) Alternate pathways/options as well as additional counseling services
(5) Where no facilitators are available, assessors will undertake all functions

Note: Credit awarded could be replaced with 'access'; 'advanced status', etc. depending on the context and purpose of RPL within the institution.

2.1.6 Review and moderation

The generic process in the SAQA RPL policy document (above), assumes that the provider has already decided upon the most appropriate assessment methodologies and instruments and that the necessary moderation of such instruments has taken place. The moderation stage intends to evaluate the whole process, including the moderation of fit-for-purpose assessment instruments and methodologies and the moderation of practitioner practice, as well as the assessment results.

However, an important decision, which is a part of the planning, is the process whereby review and moderation will take place. This includes decisions about how often such reviews may take place, by whom it will be conducted and the size of the sample of moderation of assessment results (more about moderation and review in chapter 5). Accountability in terms of RPL is critical for the credibility of the process. Careful quality management ensures that credits attained through the process of RPL are considered equal to credits attained through full time programmes.

2.2 Articulation arrangements

A critical part of the planning of RPL processes in a sector and institution/provider is the decisions relating to how credits gained through RPL assessment will articulate with formal programmes. This takes place at three levels:

2.2.1 Articulation Column

The New Academic Policy (CHE, 2001: 32), suggests that in the proposed 'articulation column', a 'curriculum space' is provided "where learners who do not meet the full entry requirements for their target programmes can 'catch up' without having to go back to the beginning again, and where RPL can be implemented". This column is the home of articulation certificates such as Bridging and Foundational Certificates, Graduate, Post-graduate and Master's certificates. These certificates are to be credit-bearing and will facilitate horizontal, vertical and diagonal (in terms of the proposed vocational and general tracks) articulation. The development of such programmes will assist in 'filling in the gaps' that may have been identified as a result of an RPL process.

2.2.2 Intra-institutional articulation

However, credit-bearing 'articulation' programmes can only be developed in relation to the requirements for registered unit standards and qualifications. This means that before formal articulation programmes could be established, would-be implementers of RPL must be clear on how learning recognised through prior learning could articulate with particular learning fields and qualifications. Implementers must, in relation to the chosen field of learning, analyse:

- How knowledge[3] is understood
- Who defines what counts as knowledge
- How knowledge is organised
- How learning is understood
- How experience and learning from experience are understood
- How pedagogy is understood

(Harris, 2000: 95, 96)

This will greatly facilitate an understanding of what should be assessed and the number of credits that could be awarded for such learning and how the learning could be articulated with formal programmes. Consider the following example of a hypothetical qualification:

Bachelor of Commerce in Management
Purpose statement:
Qualifying learners awarded with this degree, will have the requisite competence to manage a business in a particular sphere of expertise.

The key applied competence in terms of this qualification is to be able to *manage* a business in a particular sphere. Using the points mentioned above, start analyzing this qualification:

- How is knowledge understood in terms of the *management of a business*?
- Who decides how *management* is defined?
- How is the knowledge of *management* organised in this learning programme?
- What kind of learning in terms of *management* will tell me that the learner has mastered the knowledge?
- What kinds of experience and learning in *management*, outside of the context of this institution, will tell me that the learner has mastered the knowledge?
- How do we teach *management*?

The starting point therefore is to clearly specify what is understood, in terms of the qualification, what *management of a business* would entail, for example:

Management of a business include:
- *Consideration of market forces: feasibility studies; market research.*
- *Fiscal management: budgeting and planning.*
- *Business plan: strategic vision of now and the future, etc.*

Going through this process begins to clarify how learning attained outside formal institutions may be considered and valued in relation to formal

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[3] Knowledge refers to 'applied competence' as defined in official documents, i.e. 'the union of practical, foundational and reflexive competence' which incorporate skills, knowledge and values associated with the requirements for a qualification.

programmes. It also assists in deciding where such learning could be articulated in a qualification or a range of related qualifications, for example:

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┌──────────────┐                              ┌──────────────────┐
│ B.Com        │      Core generic knowledge  │ B.Com (Economic  │
│ (Management) │───── articulates with:       │ sciences)        │
└──────────────┘                              └──────────────────┘
                                              ┌──────────────────┐
                                              │ B.Com (Financial │
                                              │ Accounting)      │
                                              └──────────────────┘
```
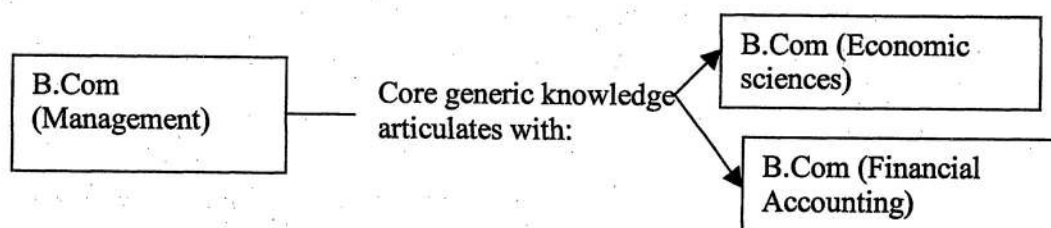
In addition, analysing a qualification (or a range of related qualifications) in this way, assists with the development of regional or inter-institutional agreements. Where all the role players in a particular field of learning agree that the specific outcomes for a qualification could be interpreted in the broad, generic manner outlined above, it will facilitate the movement of learners and credit transfer between institutions and between workplaces and institutions (Heyns, 2003).

2.2.3　Administration and the transcription of credits

As indicated in Chapter 1, the administrative process of institutions may be a barrier to the implementation of RPL. In the planning for implementation, it is therefore important to look at how the learning credited will be transcribed and articulated with 'main stream' qualifications. The following questions may be helpful:

> Will credits be recorded in terms of an academic record?
> Will credits be formally certificated?
> What is the status of such credits?
> Will credits be used for advanced standing, placement or certification?
> What is the value of such credits in relation to the target qualification?
> How will such credits be transferred?
> How will credits gained in workplace assessments be articulated with formal qualifications?

These questions suggest that practitioners must be clear on the relative value of each part of the qualification in terms of the overall requirements. In the example of the B.Com (Management) above, the core of the qualification clearly deals with 'management'. Therefore, the relative value (or weighting) of credits in terms of management will be more than other supporting parts of the qualification. Consider the following example of a hypothetical qualification:

A qualification at NQF level 4: A National Certificate: Reception, consists of 60 credits for Fundamental learning, 40 credits for Core learning and 20 credits for Elective learning. In line with the purpose of the qualification, i.e. to form the basis for further learning, clearly the assessment would be weighted to concentrate more on the Fundamental and Core learning. The structure of the qualification in terms of the purpose, the fundamentals, the

core and electives should be used as a guideline to determine the relative weighting of the parts of the qualification.

In the SAQA RPL policy it is made clear that the assessment of learners who attain credits through the process of RPL should not be more stringent than assessment for learners in full-time programmes. This means that if 50% is the minimum requirement for the successful achievement of credits in a full-time programme, RPL learners should also be required to achieve only 50%. It should not be more difficult for RPL learners to 'pass', than it is for full-time learners.

Also, all assessments must comply with the principles of assessment, particularly in terms of the currency and sufficiency of evidence offered for evaluation (more about assessment principles in chapter 4).

2.2.4   Flexibility of entry and exit points

Flexibility in terms of entry is clear. A learner should be able to enter a programme at the appropriate point. In other words, where a learner has met the requirements for the first year/semester/quarter, the learner should be able to enter the programme at the point where the second year/semester/quarter starts.

Flexibility of exit will depend on whether the learning programme for a qualification has been structured in levels, for example where a certificate could be the exit point, with formal credits awarded, but where the learner could continue at a later stage with a diploma, degree, etc. with each of these also representing an exit point.

2.3   Resources

The planning of RPL within institutions and workplaces will not be complete unless the resources needed for the implementation thereof are not clearly defined and allocated.

Resources include:

2.3.1   Person-hours

There is no doubt that the planning for the implementation of RPL in an institution or work place, will require planning for the time to be spent by staff. It should be noted however, that the implementation of any new approach requires people-hours, not only the implementation of RPL processes. The time spent on planning should be seen as an investment into a new approach, not as time away from other (more important), duties.

In addition, the need for people-hours should also include the planning for time spent on support for learners wanting to access education and training, the assessment of such learners and the post-assessment support that may be required. When planning for people-hours in this regard, would-be

implementers should find ways in which a one-on-one approach is kept to the minimum, for example:

- Screening processes could be conducted in groups through self-assessment questionnaires. If the application is viable, this could then be followed by an individual session.
- General orientation and information sessions could take place in group context.
- Challenge examinations could be conducted during normal examination periods.

However, one-on-one sessions should not be avoided. Even in full-time classroom-based programmes, practitioners will be required to conduct one-on-one sessions with learners. With an RPL process, one-on-one sessions could include pre-assessment interviews; action planning for evidence collection; post-assessment interviews and support.

2.3.2 Staff development, including administrative and support staff

Planning for staff development, including administrative and support staff is critical for the success of RPL in an institution or workplace. The SAQA RPL policy is explicit on the need for training of evidence facilitators, assessors and moderators. Training for administrative staff who will be dealing with applications for RPL, and with the transcription of credits, is also important. Planning should therefore include the time and cost requirements for the training of staff.

2.3.3 Infrastructure

The extent to which specific infrastructure is needed for the support and assessment of RPL learners, will depend on the context within which this is to be implemented. As far as is possible, existing infrastructure should be used. Where alternative/additional forms of infrastructure is required, the institution or workplace should investigate whether this could not also be used for 'main stream' programmes. This will ensure that the infrastructure not only meets the requirements for RPL, but also enhances the services for full-time candidates.

2.3.4 Assessor/moderator guides

The establishment of assessor guides, in keeping with the principles of assessment, is a very important part of the planning. Practitioners new to RPL processes will need opportunities to engage and critically debate the most appropriate methodologies, instruments and tools. Assessor guidelines could ensure that the processes followed in different contexts in an institution or workplace adheres to the same principles of validity, reliability, practicability, sufficiency and currency. The ETQA has a very important role to play here. To be able to award certificates, ETQAs must be convinced that the RPL processes and assessments have taken place in accordance with their requirements. This may include the development of standardized assessor and

moderator guides to be used by a range of their constituent providers, including workplace-based and SMME providers (more about these in chapter 5).

Moderator guidelines will be informed by the decisions made on the quality assurance of RPL processes as captured in the policy and procedures. Moderation guidelines could include the agreed processes for the moderation of assessment instruments; the number (or percentage) of assessments moderated and the moderation of the overall process. Moderation and quality assurance is critical for the integrity of the system and should therefore be carefully planned.

2.3.5 Short term plans and roll-out of the initiative

The planning process will culminate in action plans, which include short term, medium term and long terms plans.

Where RPL is introduced in an institution or workplace for the first time, short term plans could include a clearly defined pilot group, with broader implementation planned in the medium or long term.

The roll-out of RPL implementation on a wider scale will be informed by the audit of current practice as discussed in chapter 1 of these guidelines. Part of the medium to long-term plans may include lobbying for targeted funds or for changes to current inhibiting procedures and processes.

Summary

This chapter does not claim to have addressed all the aspects that need to go into a planning process for the implementation of RPL. However, it is important that would-be implementers, within the contexts that they find themselves, plan for implementation carefully and accountably. This will protect the integrity of the system and ensures that credits awarded through RPL are not considered 'second-best' or inferior to credits attained through full-time programmes.

Chapter 3 will deal with the capacity building of resources and staff.

CHAPTER 3:
GETTING READY: THE CAPACITY BUILDING OF RESOURCES AND STAFF

Introduction

In chapter 2 of this document, planning for the implementation of RPL was discussed. Planning will take place within the context, purpose and desired outcomes of RPL within a particular sector. In addition, the ETQA, in conjunction with its constituent institutions/providers, must agree and implement capacity building plans for the following:

- Training of staff
- The development of assessor and moderator guidelines, including assessment processes and procedures
- Appropriate infra-structure for assessment, including reporting mechanisms
- Quality assurance of processes and results, including internal and external moderation processes

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Purpose of this chapter

This chapter will focus on the core competencies required for RPL work, including determining what qualities and credentials are required for practitioners. This includes the requirements in terms of registration of assessors and moderators in line with legislation and policy. This chapter also highlights the need for training of **all** staff involved or with an interest in the implementation of RPL. In order to obtain support for the initiative, the management and executives of organisations must also be exposed to the concepts and principles of RPL.

3.1 Training of staff

The SAQA RPL policy is explicit about the need for appropriate training for staff that will be dealing with the RPL process. The self-audit tool in the policy (p. 23) highlights the following aspects:

Training and registration of assessors and key personnel		
Through training of assessors and other personnel involved in assessment, the quality of assessments and the integrity of the assessment system are ensured. Training enables evidence facilitators, assessors, moderators, advisors and administrative personnel to provide a holistic, learner-centred service that is in keeping with the objectives of the NQF and related policies. Monitoring policies ensure that assessors' and moderators' professional competencies in assessment are reviewed and updated.		
	Yes	No
The criteria for the registration of assessors and moderators makes explicit provision for the requisite certification in the relevant unit standards designed for that purpose, in accordance with the relevant principles and standards for assessment and moderation as set out in SAQA and other policy documents.		
Policies and review mechanisms regarding monitoring and quality assurance of evidence facilitators, assessors, moderators and other key personnel are in place.		
The functions of evidence facilitation, assessment and advising are clearly		

defined, and where possible, should not be performed by the same person.		
Training and development encourage mentoring relationships between staff with and those without assessment expertise.		
Quality assurance systems are implemented by all training providers to ensure that they increasingly meet the developmental objectives as agreed with the ETQA.		

These criteria link the quality of the process with the extent to which practitioners are trained and competent for their different roles in the RPL process. The criteria also makes it clear that not only the assessor needs training for his/her role, but that the activities preceding and those coming after the actual assessment are as critical for success as the assessment itself, including moderation of the overall processes.

In chapter 2 of this document, a generic RPL process is discussed. This flow diagram points to the fact that a number of personnel will be involved with RPL. The first point of contact (according to this flow diagram), would be with an 'evidence facilitator'. It is likely, though, that an administrative staff member, or student career guidance advisor may have already had some contact with the candidate. It is important that these staff members are also exposed to training to develop a sensitivity for the particular needs of applicants. They should be aware and be part of the processes and procedures in place for dealing with RPL candidates.

3.1.1   Evidence facilitator

Evidence facilitation is part of the pre-assessment stage. The pre-assessment stage consists of at least two separate steps:

- Screening
- Pre-assessment

During the **screening phase**, the evidence facilitator will meet with a candidate/candidates to ascertain viability of the application for recognition of prior learning. If not viable, the candidate is informed about alternative learning pathways.

If viable, the evidence facilitator and candidate embark on the pre-assessment phase. During the **pre-assessment phase**, the evidence facilitator introduces the candidate (s) to the process of assessment and the support services, including possible short learning programmes that will assist candidates in preparing their evidence (for example portfolio-development, or academic writing skills, etc.)

A unit standard was recently developed and registered for this critical part of the assessment process. The purpose of the unit standard clearly states what an evidence facilitator will be expected to do:

"This unit standard will be useful to people who assist candidates to prepare and present evidence for assessment. Such evidence facilitators will add value to the assessment process by ensuring candidates are ready to present well organised and complete evidence to registered assessors. The value will be

particularly felt when assisting candidates who are competent in their field, but are unable to present coherent evidence of that fact for reasons unrelated to their skill area.

People credited with this unit standard are able to:

- Provide information to candidates about assessment in general and their assessment in particular;
- Advise and support candidates to prepare, organise and present evidence; and
- Evaluate and give feedback on candidate evidence" (SAQA, 2002: 35).

Studies have shown that this part of the RPL process is very important. A well-prepared candidate is much more likely to succeed and therefore the time, spent on this part of the process, is time well spent. The facilitator, as part of the team that supports the candidate, should therefore be thoroughly aware of the requirements for the assessment. Evidence facilitation could be part of the learner advisory services offered by an institution/provider or an appropriate and responsible person in the workplace.

Ideally, evidence facilitation and assessment should be performed by two different people to avoid potential conflict of interest and bias, but resource constraints may make this impossible. To minimise the bias, and to accommodate the need for cost-efficiency, the two *roles* are distinct, i.e. that of an evidence facilitator and of an assessor. Should an assessor have to fulfil both roles, it is therefore important that he/she is competent in the function of evidence facilitation, as well as assessment and that he/she is clear on the purposes, roles and functions of these two stages.

3.1.2   Assessor

The assessor has a central role to play in the emerging education and training system of South Africa. An assessor is 'anyone who assesses for the purposes of making a judgement about an achievement that will result in credits towards unit standards or qualifications' (SAQA, 2001: 47)

In the *Criteria and Guidelines for the Registration of Assessors* (SAQA, 2001: 7), the role and expertise of assessors are described. An important mindset critical in terms of assessment and the role of an assessor is captured in the following:

"Learning [and assessment] is no longer something that is 'done to' the learner, but something that the learner is actively involved in. As such the role of the assessor has changed: from being a 'gate-keeper' who uses assessment to prevent learners from developing further, to a supportive guide who has the success of the learner at heart – so that the learner can gain access to further learning".

This principle is especially true for candidates wishing to have their prior learning recognised, particularly because the candidate claims that learning

has already taken place. Therefore, a candidate claiming credits against registered unit standards and qualifications, will meet his/her assessor prior to the assessment, as part of the team (evidence facilitator and assessor), that supports and guides the candidate.

The generic assessor standard (ASSMT01), "Plan and conduct assessment of learning" expresses this role of the assessor as follows:

Specific outcome 1:   *Plan and prepare for assessment*
Specific outcome 2:   *Prepare candidates for assessment*

Whereas the evidence facilitator will provide support and information of a general nature in terms of the unit standards and qualifications, the assessor will provide in-depth support and information directly related to their specialist field of learning. In addition, the assessor will have a 'birds' eye-view' of the overall outcome(s) and purpose(s) of the qualification, making it possible to use an integrated approach to assessment. The assessor will in the pre-assessment phase, for example, discuss the following in terms of the assessment plan:

- The purpose and process of the assessment and the expectations of candidates;
- Performance to be assessed;
- The type of evidence to be collected to cover a range of skills and knowledge, including problem-solving skills, knowledge, understanding, language and writing skills (where appropriate), practical and technical skills, personal and attitudinal skills and values;
- Assessment methods and instruments to be used (and appropriate alternatives where required or emanating from discussions with the candidate);
- Timing of assessment;
- Sequence of activities;
- Accountabilities, deadlines, appeals processes; and
- Arrangements for the reviewing assessment plans.

At this point, the assessor will also indicate the roles and responsibilities of each of the members of the team supporting the candidate, as well as the rights and responsibilities of the candidate, for example:

"The role of the learner
It is the candidate's responsibility to identify his/her prior learning and show that it matches the learning outcomes for a particular course or courses that form part of a programme leading to a desired qualification. It is the candidate's responsibility to prove that he/she has learned what she claims to have learned.

Rights of the learner
- The right to fair and transparent processes;

- Access up front to the standards and criteria which will be used in the assessment and accreditation processes;
- Access up front to the learning outcomes to be met;
- Access to competent, trained educators and assessors who want them to succeed and who explore innovative methods to assist them to do so, who balance adequate subject knowledge and critical cross-field outcomes with skills, competencies and practical knowledge and are skilled in working with diverse groups of adult candidates to build learning communities;
- The right to be assessed by assessment methods which are flexible, appropriate to the subject and tailored to the needs of the candidate;
- The right to have prior learning evaluated and assessed for academic credit towards credentials within a reasonable period of time; [and]
- The right to transfer credits gained by means of the RPL process" (CTP, 2001: 21)

When candidates are sufficiently prepared for assessment, then the assessor:

"Conduct[s] assessment and document[s] evidence" (specific outcome 3 of the ASSMT01 standard).

Assessment is defined as 'a structured process for gathering evidence and making judgements about an individual's performance in relation to registered national standards and qualifications' (SAQA, 2001: 16). Assessment therefore should ensure that a true reflection of a candidate's skills, knowledge and values are identified. In terms of training, this means that an assessor should be a subject matter expert, but should also have contextual expertise whereby their expertise relates to an understanding of occupational contexts within which the candidate may have gained the learning. This requires that the assessor is able to assess holistically and without bias.

A holistic approach
In the SAQA RPL policy (SAQA, 2002: 11) a holistic approach refers to the ability to look for the 'intrinsic, rather than extrinsic value of someone's learning within a particular context and the ways in which some forms of knowledge are privileged. The question that we need to answer is how to redefine, systematically and consciously, which knowledge is valued'. (A model to develop an understanding in this regard will be discussed in chapter 4 of this document.) A contextual understanding of the candidate's learning will greatly enhance the possibilities for evidence to be presented, accepted and articulated. Further, a holistic approach tries to prevent visible and invisible biases from influencing the ways in which we assess, thereby making it possible to acknowledge and utilise the rich diversity of knowledge and learning styles.

Bias
In South Africa, 'bias' is particularly associated with issues of race, language, religion, gender and class, but numerous other forms of bias may have an impact on assessment of candidates in terms of their prior learning. The bias against experiential and non-formal forms of learning for example, may inhibit

the assessor from finding alternative forms of evidence for applied knowledge and skills, particularly if such evidence is not presented in a 'traditional' format. Anti-bias and sensitivity training, specifically as it relates to the fears and doubts of adult learners, should be an integral part of assessor training.

Specific outcome 4 of the generic assessor unit standard requires that an assessor should be able to *'evaluate evidence and make assessment judgements'*.

The integrity of the assessment, and equally important, of the RPL system, hinges on the extent to which assessors can evaluate evidence and make assessment judgements in a credible and accountable way. This places a huge responsibility on assessors and requires a critical reflection on their own practices. It is for this reason that support structures for assessors are as important than is support for candidates. Mentoring and coaching of assessors by internal moderators and external verifiers are critical to develop the skills and abilities of assessors.

In the CTP RPL policy document (CTP, 2001: 17), assessors are given the following decision-making powers:

"Assessors may:
- Grant the level of credit sought by the candidate;
- Grant credit in excess of the level sought by the candidate;
- Grant credit at a lower level than that sought by the candidate;
- Grant such credit as is appropriate in the circumstances;
- Refuse to grant credit;
- Request that additional information be provided in whatever format necessary;
- Refer the candidate for additional learning programmes and request reassessment after completion;
- Review the RPL process and take appropriate actions to improve the performance where necessary;
- Follow national guidelines for an appeals/grievance procedures for candidates who may want to appeal against an unfavourable outcome on procedural or academic grounds and design a procedures template"

Clearly, this level of responsibility requires an in-depth understanding of assessment and the role of the assessor. Would-be implementers may opt for 'assessment panels' at the beginning stages of implementation to safeguard against bias. The Technikon of Southern Africa uses the following model:

ASSESSMENT PANEL
Academic(s)
Industry representative
Trained [RPL] assessor
CANDIDATE SUPPORT PANEL
Interpreter
Support person(s)

However, in terms of the SAQA regulations, all practitioners who will be responsible for the assessment of the achievement of learning outcomes leading to qualifications and standards registered on the NQF, should be trained to become certificated assessors and registered constituent assessors for specified qualifications and/or standards with the appropriate ETQA. Qualified practitioners will be listed on the National Learner's Records Database (NLRD) as having achieved the minimum standard, i.e. the generic assessor standard ASSMT01.

Part of the responsibility of the assessor also includes:

'[To] *provide feedback to relevant parties' (Specific outcome 5 of the generic assessor standard)*

Apart from the administrative processes, where reports are submitted and recorded with the appropriate structures, assessors should be able to comment on the quality and sufficiency of the candidate's performance in relation to the agreed outcomes and criteria and should ensure that their feedback is constructive and the basis for further decisions. In addition, a candidate has the right to give feedback on the process and may request further clarification and explanation. The appeals process, introduced to the candidate during the pre-assessment phase, may be initiated at this point.

The final specific outcome: *Specific outcome 6: Review assessment,* is a critical skill required of assessors. Weaknesses identified in the assessment design and process that may compromise the fairness of assessment must be dealt with in accordance with the provider/institution's assessment policy. Where weaknesses arose as a result of poor quality unit standards and qualifications, clearly this information must be made available to the responsible ETQA. However, to be critical of one's own practices requires open-mindedness and a developmental approach. Training of assessors must address this aspect.

To conclude this section, it should be acknowledged that the implementation of RPL could be a cost and labour intensive exercise, particularly as RPL processes are currently not subsidised. It is therefore important that providers/institutions develop cost-effective mechanisms when dealing with RPL requests. These may include minimising the need for one-on-one evidence facilitation and assessment where appropriate, but it should be noted that in classroom-based assessments, many examples exist where learners are also assessed individually, for example:

- Assignments – the assessor evaluates each learner's assignment individually
- Verbal reports/speeches
- Projects
- Portfolio's
- Demonstrations
- Simulations, etc.

Note:

Good assessment practices will include such methodologies for classroom-based learning. Yet, when we plan for RPL assessment, the notion of 'labour intensiveness' is raised as an inhibitor to the implementation of RPL.

3.2 Assessor and moderator guidelines

3.2.1   Assessor Guides

The assessor guide is a standardised 'toolkit' developed in conjunction with the internal and external moderator, to ensure consistency of assessment. This is a critical part of the planning for RPL implementation and facilitates a common approach and understanding of the approach and procedures to be followed. At this level it could be highly generic, i.e. it describes an approach that could be used in any context. Consider the Construction Sector Education and Training Quality Assurance Body's (CETA's), assessor guide:

The **ASSESSOR GUIDE** is one of the instruments the Assessor uses in the assessment & action planning stage

The **TOOLKIT** of the Assessor consists of the following:

> ➤ Assessment procedure
> ➤ Action plan procedure

And the following instruments:
1. Assessor guide
2. Assessment report
3. Evidence guide
4. Instruction for candidate
5. (Orientation document)
6. Action plan
7. RPL evaluation form

(CETA, 2002: 2 of Assessor guide 1)

Assessor guides will be developed with the context of the sector and provider/institution in mind.

An **evidence guide** will be part of the assessor guide (see above). The evidence guide will assist the assessor in determining what to look for within the context of the particular field of learning. The process whereby it is determined what will be proof of a candidate's learning and experience is discussed in detail in chapter 4 of this document.

Consider the extracts from the CETA evidence guides as an example:

Evidence guide: RPL I 05 02 01

SECTION 1: INSTRUCTIONS FOR THE ASSESSOR

The purpose of this section is to assist you to assess a candidate in accordance with the objective of the assessment and help you plan the assessment.

1.1 Content of the assessment in brief
1.1.1   Objective of the assessment
To establish the [applied] competence [and knowledge] of a learner/candidate based on the assessment criteria for ....
A candidate declared competent [as having the requisite knowledge, skills and values] will receive credits and a recommendation for an award that will be registered by the ETQA.

1.1.2   Outcomes to be assessed
(What is to be assessed?)
1.1.3   Assessment criteria
(What will tell the assessor that a candidate meets the requirements of the outcomes?)

Clearly, the 'evidence guide' is much more specific than the over-arching assessor guide, dealing with the specifics within a particular field of learning.

3.2.2   Moderator guides

The moderation function of a provider/institution is a key aspect of the overall approach to quality assurance. Quality assurance will be discussed in detail in Chapter 5 of this document, but it is important to note that accountability is considered to be integral to the new approach of education and training in South Africa. The *Criteria and Guidelines for the Assessment of NQF registered Unit standards and Qualifications* (SAQA, 2001: 60) indicates that moderation takes place at four levels:

1. **NSB's** submit qualifications with moderation options
2. **ETQAs** establish moderation systems for accredited providers
3. **Providers** establish internal moderation systems in line with the ETQAs
4. **SAQA** appoints **moderating bodies** to assure consistency in unit standards and qualifications across one of more ETQAs

This section will deal in particular with the internal moderation system (no. 3 above) established by providers/institutions to:

- Verify that assessments are fair, valid, reliable and practicable;
- Identify the need for the re-design of assessment is required;
- To provide an appeals procedure for dissatisfied learners;
- To evaluate the performance of assessors;
- To provide procedures for the de-registration of unsatisfactory assessors; and

- To provide feedback to NSB's on unit standards and qualifications (via the ETQA).

<div align="right">(SAQA, 2001: 60)</div>

The internal moderator(s) of a provider therefore has a very important role to play in establishing and maintaining an RPL system for the provider/institution and is considered to be a critical member of the team. He/she will assist in the establishment of appropriate assessment methodologies and tools, help define the assessor and evidence guides and moderate a sample of the assessments and the assessor practice in line with the requirements of the ETQA.

The purpose is to ensure that "assessments conducted in a single learning provider are consistent, accurate and well-designed" (SAQA, 2001: 61). The three main stages, according to the *Criteria and Guidelines for the Assessment of NQF registered Unit standards and Qualifications* (SAQA, 2001: 61), for internal moderation include:

i.)   Design
      The choice and design of assessment methods and instruments are appropriate to unit standards and qualifications being assessed.
ii.) Implementation
      The assessment is appropriately conducted and matches the specifications of unit standards and qualifications. This includes ensuring that the appropriate arrangements have been made and that there are regular discussions among assessors.
iii.) Any lessons learnt from the two previous stages are considered and the necessary changes are made.

The planning for moderation will be captured in the moderation guides. It will involve all members of the team, i.e. administrative staff, evidence facilitators, assessors and other relevant people. In chapter 2 of this document, planning for the sector was dealt with in detail. However, extracts from the table, (from the *Criteria and Guidelines for the Assessment of NQF registered Unit standards and Qualifications* (SAQA, 2001: 65)) may be helpful to conceptualise this particular part of implementation:

WHAT?	Will all registered standards be moderated? Will all candidates be moderated? If not, what percentage? Will all assessments be moderated? If not, what percentage? Will all [training] programmes be moderated?
WHO?	Who will conduct the moderation? (Internal moderators, ETQA/external moderators, professional bodies?)
HOW?	How will moderation be done? Moderation of assessment methods, instruments and materials: - Before assessment? - Post assessment? - Both?
WHEN?	Continuously? Monthly? Quarterly? Annually?

COST?	Who will pay?
	Cost-effective ways of moderation?
REPORTS?	Who provides information?
	To whom?
	(Internal moderator, external moderator, ETQA?)
EVALUATION?	What system will be put in place to evaluate the effectiveness of the moderation system itself?

The inter-relatedness of all the role players in the establishment of a credible RPL system is key to the success of the initiative. The following diagram highlight some of the processes:

	What?	Who is responsible?	Moderation?

Stage 1: **Design**	Policy and procedures
	Assessment methodologies:
	  • Instruments
	  • Exemplars
	  • Assessor guides
	  • Evidence guides
	Quality assurance interventions
	Support structures
		All
		Assessors
		
		Moderators
		All
			
			Pre-assessment moderation of tools
			
			Overall process
			Support for candidates and staff

Stage 2: **Implement**	Assessment procedures Assessment	Administrative staff, evidence facilitators and assessors Assessors	Procedures in accordance with provider plans Assessment results and assessor conduct

Stage 3: **Review**	Policy and procedures
	
	Assessment methodologies:
	  • Instruments
	  • Exemplars
	  • Assessor guides
	  • Evidence guides
	Quality assurance interventions
		All
		
		Assessors and moderators
		
		All
			Assessment processes and procedures
			Assessment methodologies and instruments
			
			Moderation processes

Stage 4: **Report**	Assessment results Assessment instruments Practitioner capacity Feedback to NSBs regarding unit standards and qualifications	Assessors and moderators Assessors and moderators Moderators in accordance with provider specifications Moderators	Results and achievements Appropriateness of instruments Skills of practitioners Appropriateness of unit standards and qualifications

3.3 Summary

This chapter dealt in particular with the skills, knowledge and attitudes required of the practitioners who will be dealing with RPL candidates. These practitioners include the evidence facilitator, the assessor and the internal moderator, as well as the support staff who will at various stages, make contact with the RPL candidate. A focus on these roles and functions of these practitioners may create the impression that RPL is highly resource and cost intensive, but as stated in the SAQA RPL policy in terms of services and support to learners/candidates, "as far as possible, a separate infrastructure should not be established for RPL". There is no doubt, however, that the implementation of RPL will require the allocation of specific roles and duties and the development of expertise in this area of provisioning. It will also require the allocation of funds.

Would-be implementers of RPL will gain much more buy-in from their organisations if the benefits of the development of a credible RPL system could be incorporated into the re-structuring of assessment systems per se. Lessons learnt through the establishment of RPL processes and assessment, including the quality assurance thereof, could inform the development and improvement of practices for classroom-based learning. Therefore, the extent to which RPL processes and systems are detailed may have benefits for the organisational alignment with the principles and objectives of the NQF and is time and resources well spent.

Chapter 4 will deal with the tools: Design and moderation of assessment

CHAPTER 4:
THE TOOLS: DESIGN AND MODERATION OF ASSESSMENT

The SAQA RPL policy states that the design and moderation of appropriate assessment instruments and tools "is a critical step to ensure the credibility of the assessments, and the integrity of the system" (Chapter 3: 32)

Purpose of this chapter
This chapter will provide a theoretical model for engaging with the complex issue of assessment of experiential learning against conventional unit standard based and non unit standard based qualifications, as well as give examples and guidance as to how such learning could be assessed.

Chapter 4 of the guidelines will therefore address the following in terms of assessment:

- The need for the clarification of the purpose and expectations of assessment in terms of the candidate within the contexts of the sector and the institutional/provider plan;
- The extent to which candidates could be involved in the choice of assessment approaches and methods, and the appeals process;
- The support structures required based on the RPL implementation plan;
- The forms, quality and sources of evidence appropriate to the field of learning, level and specialization;
- The assessment process, including a generic approach to RPL assessments;
- The assessment methodologies, tools and instruments and valid alternative methods if the aforementioned are not feasible, and exemplars thereof where possible;
- The process whereby the above decisions are arrived at, i.e. by making use of the 'nested' approach described in the draft Level Descriptors document, particularly in terms of recognition of 'equivalence' as opposed to direct matching against unit standards and qualification outcomes; and
- The benefits of the 'nested' approach to curriculum development.

It will also address the moderation and review processes to ensure that the integrity of qualifications and the system as a whole is protected. This will include moderation and review of:

- Assessment tools and instruments;
- Assessor guides; and
- Reporting structures.

4.1   Methods and Processes of Assessment

In the SAQA RPL policy, the self-audit tool in Chapter 2 of the policy (p. 25) highlights the importance of appropriate assessment processes and instruments for RPL. Consider the self-audit tool:

METHODS AND PROCESSES OF ASSESSMENT		
Assessment is a structured process for gathering evidence and making judgements about a candidate's performance in relation to registered national standards and qualifications. This process involves the candidate and the assessor within a particular context in a transparent and collaborative manner.		
	Y	N
The purpose of assessment and the expectations of the candidate are clarified		
Assessment plans take into account the form, quality and sources of evidence required (for example performance evidence, knowledge evidence, knowledge testimony, etc.)		
The form and quality of support to be provided to the candidate in preparing for the assessment are established		
The candidate is actively involved in all aspects of the assessment process to ensure that the assessment is fair and transparent. Possible barriers to fair assessment are identified and addressed.		
Assessment plans indicate a variety of appropriate assessment methods and instruments to validate diverse types of learning		
The choice of assessment methods is fit for purpose and ensures reliable and valid assessment outcomes.		
An appeals process is in place and made known to the candidate.		
Assessment instruments and exemplars are developed and moderated in compliance with the ETQA requirements.		
Assessment reports indicate the assessment plan, the evidence presented, the assessment outcome and recommendations for further action, including additional training and/or re-assessment.		
Moderation and review mechanisms are in place, including policies for verification, evaluation and quality assurance of assessments and assessment systems.		

It is through the assessment of previously acquired skills and knowledge that decisions are made regarding the learning of a person seeking credits against registered unit standards and qualifications. Valid, reliable and practical assessments ensure the integrity of an RPL system and could enhance assessment practice generally.

In the words of the SAQA RPL policy:

"…it should be noted that there is no fundamental difference in the assessment of previously acquired skills and knowledge and the assessment of skills and knowledge acquired through a current learning programme. The candidate seeking credits for previously acquired skills and knowledge must still comply with all the requirements as stated in unit standards and qualifications. The difference lies in the route to the assessment" (SAQA, 2002: 8).

4.1.1   Purpose and expectations

In Chapter 2 of this document, the different purposes of RPL were described. This should be captured in the RPL policy of the institution/provider. This

purpose (or combination of purposes) must however be made very clear to the candidate claiming credits towards unit standards and qualifications. There is for example, the mistaken perception that if a person has a number of years experience and has completed a number of short courses, that these could be combined to make up a qualification. The candidate should clearly understand that if the learning achieved through such experience and through the attendance of short learning programmes meets the requirements of a registered unit standard and/or qualification, then credits could be awarded – credits are awarded for learning, not for time spent in a particular environment. In addition, credits are always awarded through some or other form of assessment and are not awarded ad hoc. The SAQA RPL policy makes it clear that the process of RPL is about:

- "Identifying what the candidate knows and can do
- Matching the candidate's skills, knowledge and experience to specific standards and the associated assessment criteria of a qualification
- Assessing the candidate against those standards
- Crediting the candidate for skills, knowledge and experience built up through formal, informal and non-formal learning that occurred in the past" (SAQA, 2002:7).

It is therefore important for a candidate to be clear on what the purpose of RPL at the institution/provider will be, i.e. access, advanced standing and/or formal certification. This means that the candidate must know whether a formal, valid certificate will be issued, or whether he/she will be granted access to a formal learning programme based on the assessment of his/her prior learning and most importantly, know what the status of such credits are. Institutions and workplaces implementing RPL must, in their planning, be clear on the following questions:

- Will these credits be transferable intra-institutionally and/or inter-institutionally?
- Will a candidate be able to use a transcript of such credits for employment or promotion purposes?
- Will an academic record be issued?
- What is the value of credits awarded?

If such matters are not clarified from the outset, candidates may feel deceived and may question the integrity and validity of the system.

4.1.2   The form, quality and sources of evidence

The form, quality and sources of evidence that will lead to the attainment of credits will depend on the purpose, outcomes and assessment criteria of the unit standards and qualifications. It is therefore critical that would-be implementers of RPL be clear on what kinds of evidence will be required to offer proof of knowledge and skills in relation to the target qualification. Implementers should

also be open to taking into account evidence that do not exactly match the formal requirements for the qualification.

However, as stated in the SAQA RPL policy:

"Quality of evidence relates to reliability, validity, authenticity, sufficiency and currency. Particularly in RPL assessment, the latter two issues of quality are important. In the case of sufficiency, it is not only a question of whether enough evidence has been gathered. Sometimes, in an attempt to ensure rigour, assessors require too much evidence (e.g. extensive triangulation) and thus make the assessment process very onerous for candidates and for assessors. The essential reference point for 'marking' RPL is the lowest mark which enables a classroom taught candidate to 'pass'. Rarely does this mean a complete coverage of the syllabus. It would be unfair to RPL candidates to expect more that the minimum requirements for learners in full-time study" (SAQA, 2002:24).

With that in mind, evidence of skills, knowledge and values may be in the form of:

- Certificates from previous education and training courses, including short learning programmes and skills programmes
- Licences to practice
- Professional registration
- Products of any nature relevant to the courses offered at the institution: art portfolios; publications, etc.
- Samples of completed work
- Employment related documents such as resumes, performance appraisals, etc.
- Statutory declaration outlining previous types of work and experience
- References from current and past employers, supervisors and colleagues
- Testimonials from persons holding relevant qualifications in the area being assessed
- Photographs of completed work certified by a referee or accompanied by a statutory declaration
- If self-employed in the past, evidence of running a business using the skills and knowledge being claimed.

<div align="right">(Mays, T. 2002)</div>

The examples given above represent a number of static forms of evidence that could, once authenticated (and therefore assessed), be accepted as proof of applied knowledge. However, not all candidates will be able to produce such a range of evidence and additional forms of evidence may be required. The following table represents a number of assessment methods that can be used for RPL. Some of these methods could be used for authentication of evidence produced, but will also provide proof of learning where evidence in the form and shape of the list above, cannot be produced:

Assessment Methods	Purposes and Examples
Interviews	To clarify issues raised in documentary evidence presented and/or to review scope and depth of learning. May be particularly useful in areas where judgement and values are important. (May be structured or unstructured).
Debate	To confirm capacity to sustain a considered argument demonstrating adequate knowledge of the subject.
Presentation	To check ability to present information in a way appropriate to subject and audience.
Performance testing	To test applications of theory in a structured context in correct/safe manner.
Examination	To test concepts and basic skills and applications using practical examples.
Oral examination	To check deep understanding of complex issues and ability to explain in simple terms.
Essay	To check the quality and standard of academic writing and use of references, ability to develop a coherent argument, and to confirm extent, understanding and transferability of knowledge and critical evaluation of the ideas.
Examples of work done or performed or designed	To check the quality of work, relevance to credit sought and authenticity of production.
Portfolio	To validate applicant's learning by providing a collection of materials that reflect prior learning and achievements. Will include own work, reflections on own practice and indirect evidence from others that are qualified to comment. The portfolio will identify relevant connection between learning and the specified or unspecified credit sought.
Book review	To ensure currency and analysis of appropriate literature is at a satisfactory level.
Annotated literature review	To illustrate the range of reading done by the applicant and ensure appropriate coverage to fulfil subject requirements.
Special projects	May be used to meet a variety of purposes – to add greater currency to knowledge of skills, to extend scope of prior learning.
Reports, critiques, articles	To indicate level of knowledge and assess analytical and writing skills and issues involved in the current debate on the subject.

(Cohen, R. in Harris, J., 2000: 148, 149)

These examples are not exhaustive but are useful guidelines for the development of assessment methodologies when dealing with RPL.

Other, commonly used methods in a number of international contexts include:

- United States of America:
  Standardised national examinations
  Institutionally-developed challenge examinations
  National course examinations for recommendations regarding non-formal NGO/company based training
  Individual assessment through a portfolio of evidence or oral interview

- United Kingdom:
  Portfolios of evidence
  Assigned subject-related essays
  Challenge examinations
  Interviews/oral examinations
  Testimonials from supervisors
  Projects
- Australia:
  Work-experience 'translated' into educational outcomes
  Validation of industry-based and in-house training programmes through an
  evaluation of such programmes
  Challenge tests
  Portfolios
- Canada:
  Portfolio assessments
  Demonstrations
  Challenge examinations
  Workplace training programme evaluation

It should be clear that RPL practitioners have a range of valid forms of assessment to choose from when making decisions about their preferred assessment methodologies. However, it is important to remember that assessments should be fit for purpose and a particular assessment tool should not be used where there are more efficient and practical ways to assess.

4.1.3 Candidate support

The SAQA RPL policy is explicit on this particular part of the RPL process:

"...the danger of underestimating the levels of disempowerment and dislocation that decades of discriminatory education and training practices had on ordinary citizens, and the unfamiliarity with formal academic study, (particularly in higher education), cannot be ignored. Therefore the support services [to RPL candidates] should consciously address the invisible barriers to successful assessment. This may include a re-alignment of existing academic development programmes to suit the needs of adult learners, advising programmes, assistance with identifying equivalencies and preparation for assessment. This may also include dealing with the very significant anxieties, traumas and non-technical barriers that arise when adult learners enter the RPL arena" (SAQA, 2002:20).

Learner-centredness is a key principle underpinning the National Qualifications Framework. Translated into candidate support, it means that advisory or other support services may need to be developed to complement the processes where appropriate evidence is identified and benchmarked and to support candidates in the preparation and planning for assessment. The extent of such support services will depend on the context. It may be possible, for example, for current student

services offered by providers to offer pre-entry advice, educational planning services and post-assessment guidance. However, where necessary, additional support must be made available.

Candidate support will also include the extent to which candidates are able to choose assessment methodologies that they feel most comfortable with. This does not mean that such alternative methodologies are in any way inferior, but that it may be less threatening to the candidate. The candidate also does not have an open choice of assessment methods, but alternatives to a particular method could be provided, (i.e. instead of a major project, a number of smaller assignments, culminating in the achievement of the outcome, could be used, or rather than using a formal written examination, an oral examination could be used).

4.1.4   The assessment process and appeals procedures

In Chapter 6 of the *Criteria and Guidelines for the Assessment of NQF registered Unit Standards and Qualifications* (p. 49 – 58), a generic assessment process is proposed. The suggested generic process in the SAQA RPL policy, mirrors this approach (p. 33).   All assessments should therefore encapsulate the following basic processes:

- The Preparatory phase

  In the preparatory phase, practitioners (including people responsible for advising and for assessing) are required to familiarise themselves with unit standards and qualifications that they will be assessing. This includes being very clear on the purpose, outcomes, assessment criteria and other relevant information that will impact on the design of the assessment instrument.

  During this phase, the practitioner makes decisions about the most appropriate assessment methods, instruments, type and amount of evidence required, as well as alternative methods which may emanate from discussions with candidates.

  It is also during this phase that moderation of the assessment methods and instruments take place. Moderation could take place through discussions with other specialists in the area.

  The type and extent of pre-assessment, assessment and post-assessment support for candidates are decided and described.

- The Assessment phase

  The assessment phase again are divided into four stages:

- The planning for assessment.

> The practitioner informs the candidate about the requirements, discusses the forms and type of evidence required, and reaches agreements on the assessment instruments to be used, the standard and level of performance expected and highlights the support structures in place to assist the candidate in the collection of evidence. The candidate is also informed about the provider's appeals process should that be required. At this point, the assessor and the candidate may choose to use alternative forms of assessment, where appropriate.

- The assessment

> The assessment is conducted in an appropriate and enabling environment.

- The judgement

> A judgement is made in accordance with the pre-agreed criteria.

- Feedback

> Feedback includes a discussion of the results of the assessment, guidance, further planning and post-assessment support (if required).

An appeals process could be initiated at this stage. The structure and procedures of the institution/provider should be available. A generic appeals process is discussed in the *Criteria and Guidelines for the Assessment of NQF registered Unit Standards and Qualifications* (p.54). Consider the following flow diagram:

Example of an appeals procedure:
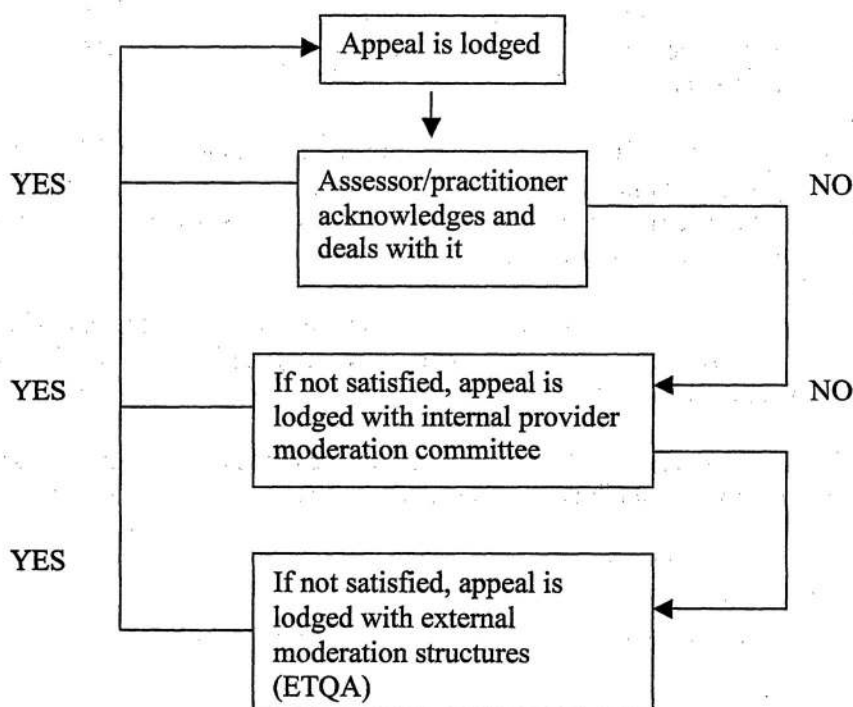
4.2 A Working Example

RPL will take place in a variety of contexts. It is therefore impossible to include examples of all the different environments. However, an approach to the establishment of assessment methods and instruments may be generalised. This section will explore a process that will facilitate decisions regarding what should be assessed when a person requests recognition of prior learning, and how the assessment(s) could take place. It starts off with the broadest possible understanding of what a qualification should enable learners to do, and then progressively moves towards and understanding of the area of specialisation that will tell practitioners in that particular field of learning that a candidate has met all (or part) of the requirements for the qualification.

Each institution/provider will have its own learning programme that will progressively assist learners to achieve the overall purpose of the qualification. The extent to which such learning programmes differ between institutions/providers, will facilitate or inhibit the award of credits towards a particular qualification and the subsequent transfer of such credits intra-institutionally and inter-institutionally. It should be noted though, that a registered qualification does not contain the learning programme of a particular provider, but rather contains a broad description of what a learner can expect to be able to do on successful completion. Where the point of departure is the outcomes or results of learning, rather than the actual input in terms of the learning programme, establishing equivalence, rather than literal matching with subjects and modules, will become possible (Heyns, 2003:). To describe the approach, a hypothetical qualification, B.Com.: Tourism Management will be used.

4.2.1 The 'Nested' Approach to Standards-Generation and Qualifications Specification

The 'nested' approach to standards-generation and qualifications specification in the New Academic Policy Discussion Document (CHE, 2001: 45), is useful to understand the *broadest to narrowest* approach. This approach was not developed with RPL in mind, but could be helpful in the establishment of what should be assessed when RPL is requested. Consider the diagram:

LEVEL (Level descriptor) e.g. Level 7

QUALIFICATION TYPE (qualification descriptor) e.g. General Bachelor's Degree

DESIGNATED VARIANT (designator) e.g. Bachelor of Commerce

QUALIFICATION SPECIALISATION (qualifier) e.g. Bachelor of Commerce in Tourism Management
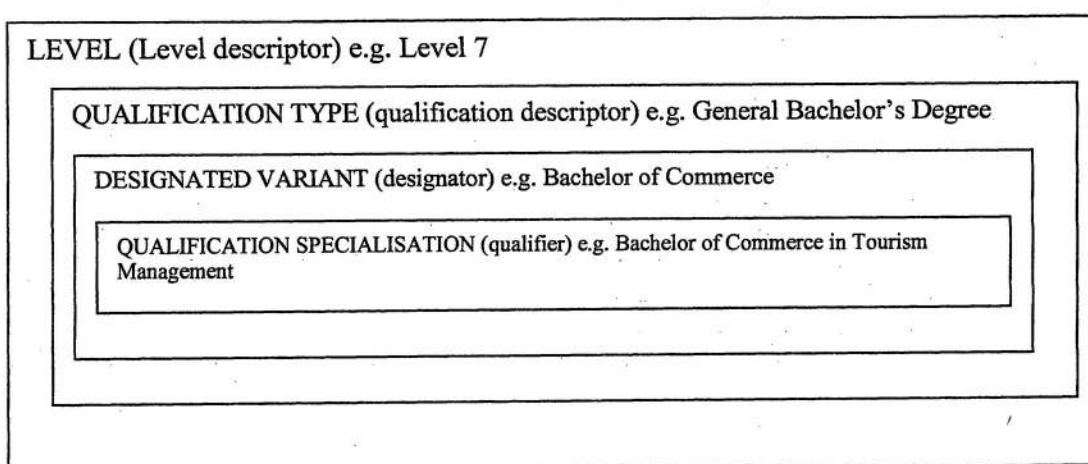
Level descriptor: LEVEL 7

The description of what a learner should be able to do at Level 7 of the NQF, i.e. at the achievement of a first degree is as follows:

Applied Competence	Autonomy of Learning
Typically, a programme leading to the award of a qualification or unit standard at this level aims to develop learners who demonstrate:	
a. a well-rounded and systematic knowledge base in one or more disciplines/fields and a detailed knowledge of some specialist areas; b. an informed understanding of one or more discipline's/field's terms, rules, concepts, principles and theories; an ability to map new knowledge onto a given body of theory; an acceptance of a multiplicity of 'right' answers; c. effective selection and application of a discipline's/field's essential procedures, operations and techniques; an understanding of the central methods of enquiry in a discipline/field; a knowledge of at least one other discipline's/field's mode of enquiry; d. an ability to deal with unfamiliar concrete and abstract problems and issues using evidence-based solutions and theory-driven arguments; e. well-developed information retrieval skills; critical analysis and synthesis of quantitative and/or qualitative data; presentation skills following prescribed formats, using IT skills effectively; f. an ability to present and communicate information and opinions in well-structured arguments, showing an awareness of audience and using academic/professional discourse appropriately.	a capacity to operate in variable and unfamiliar learning contexts, requiring responsibility and initiative; a capacity to self-evaluate and identify and address own learning needs; an ability to interact effectively in a learning group.

A careful consideration of the level, breadth and depth of learning required at a first degree level, hints at what should be assessed to determine whether a candidate meets the requirements for credits on this level. These include:

- Detailed knowledge of the area of specialisation
- Familiarity with the area of specialisation's terms, rules, concepts and principles
- Application of the area of specialisation's procedures, operations and techniques
- The ability to apply knowledge in unfamiliar contexts
- IT and information retrieval skills

- Presentation and communication skills

In addition, it is expected of a successful learner at this level to take responsibility for his/her learning and to reflect on his/her own practices.

Drilling down into the next level requires considering the qualification type, in this case a General Bachelor's Degree.

Qualification type: General Bachelor's Degree

The description of what a learner is expected to be able to do at the level of a General Bachelor's Degree is captured as follows in the NAP discussion document (Chapter 6):

"The purpose of the General Bachelor's Degree is to develop graduates who have benefited from a well-rounded , broad education and who can fully demonstrate the capabilities described in the Level 7 descriptor, including the demonstration of initiative and responsibility in an academic or professional context. A Bachelor's Degree programme in the General Track consists of at least one major or cumulative specialisation, and some exposure to other disciplines. This means that graduates should have studied at least one discipline/field progressively throughout the programme to the point where they have attained some depth of knowledge and expertise in the area, as well as gaining a broad comparative knowledge".

As in the case of the Level Descriptors for Level 7 of the NQF, the above qualification description indicates what should be assessed, in particular:

- The extent to which a candidate is conversant in an area of specialisation, e.g. Management in the Tourism industry.

It also gives an indication of the relative weighting that should be given to the different parts of the qualification, i.e. the 'majors' will carry more weight in terms of the overall assessment, than the 'other disciplines' learners are exposed to in attaining the qualification.

Designated variant: Bachelor of Commerce

The designated variant makes it possible to determine and define articulation possibilities. All degrees known as a 'Bachelor of Commerce', for example, will have as its core learning, subjects/modules dealing with economic and business sciences. Where credits are awarded for this part of the qualification, an RPL candidate could articulate those credits with a number of qualifications in and outside of the institution/provider. (The structure of a qualification, as described in the NSB Regulations, will also assist in determining the relative importance of a particular part of a qualification in terms of its credit values and levels of

attainment). Consider the example used in Chapter 2 of this document for a B.Com. Management degree:
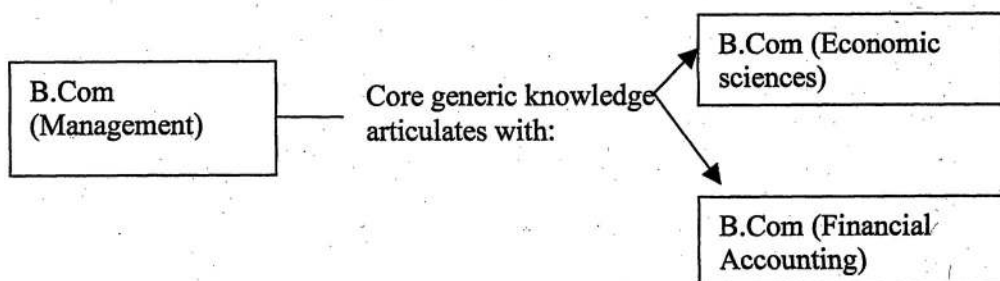
Qualification specialisation: B.Com.: Tourism Management

The qualification specialisation is the final level of the 'nested approach'. By understanding how the qualification fits into an overall structure, and the type, breadth and depth of learning required to achieve a qualification at a particular level, a holistic and integrated approach to assessment of prior learning can be developed. In terms of the hypothetical qualification used as an example, the purpose, exit level outcomes and associated assessment criteria will inform the detail of the assessment within the broader conceptualisation of a qualification at this level. The purpose for this qualification could read:

Bachelor of Commerce: Tourism Management

Purpose:
The overall purpose of this qualification is to develop future managers and entrepreneurs in the tourism sphere.

The exit level outcome(s) for this qualification could read:

Exit level outcome(s):
After completion of the B.Com (Tourism Management) programme the graduate will have the competence to operate and/or manage any of the key functional areas of a tourism business and be in the position to become an entrepreneur in the tourism sphere.

The purpose and exit level outcome(s) highlight the core of the qualification, i.e. management and entrepreneurship. Assessment should therefore focus, in keeping with the level, breadth and depth of learning required for this level of qualification, on the ability to manage and the entrepreneurial skills of the candidate. The assessment of these aspects will carry the most weight in terms of the overall assessment.

In order to establish what should be assessed to determine whether the candidate meets the requirements for the qualification, the first question should be:

How will we (the practitioners) know that a person can manage key functional areas of a tourism business?

In the example in Chapter 2 of this document, some answers are emerging:

Management of a business include:
- *Consideration of market forces: feasibility studies; market research.*
- *Fiscal management: budgeting and planning.*
- *Business plan: strategic vision of now and the future, etc.*

The second question, in terms of this qualification could be:

How will we know that a person is in the position to become an entrepreneur in the tourism sphere?

Possible answers emerging from this question, are:

Entrepreneurial abilities include:
- *The identification of a niche market*
- *The identification of the resources and tools required to start a business in the tourism sphere*
- *The development of marketing material and tools*
- *The implementation of a marketing strategy, etc.*

Once practitioners are clear on what would constitute, within the framework of the qualification, applied knowledge, decisions regarding assessment methods and instruments could be made. The following table takes this example further:

What is to be assessed?	Possible assessment instruments	Links to the qualification descriptor	Links to the level descriptor
The ability to **manage**, i.e. Fiscal management; Drawing up a budget; Resource management; Business plan, etc.	Portfolio of evidence containing authenticated documents proving competence in management; Projects, e.g. to draw up a business plan; Assignments, e.g. to indicate how	The extent to which a candidate is conversant in an area of specialisation, e.g. Management in the Tourism industry.	Detailed knowledge of the area of specialisation; Familiarity with the area of specialisation's terms, rules, concepts and principles; Application of the area of specialisation's

	resources will be managed; Case studies, e.g. how knowledge could be applied in unfamiliar contexts; Challenge examination, e.g. to assess underpinning theoretical knowledge of economic and business sciences.		procedures, operations and techniques; The ability to apply knowledge in unfamiliar contexts.
Entrepreneurial abilities, i.e. Identification of target market; The identification of resources and tools to start a business; The development of a marketing strategy; etc.	A major project including the assessment of all the aspects mentioned; Portfolio of evidence with authenticated documents proving competence; Presentation e.g. of a marketing plan; Challenge examination, e.g. to assess underpinning knowledge of marketing.	The extent to which a candidate is conversant in an area of specialisation, e.g. Entrepreneurship	Detailed knowledge of the area of specialisation; Familiarity with the area of specialisation's terms, rules, concepts and principles; Application of the area of specialisation's procedures, operations and techniques; The ability to apply knowledge in unfamiliar contexts; Presentation and communication skills.
Other requirements, e.g. Knowledge of the tourism sphere; IT usage and retrieval of information; Experiential learning in a tourism business;	Challenge examination, e.g. to assess knowledge of historical and/or cultural and natural sites suitable for tourism; Industry-based certificates, e.g. for IT skills; Logbooks e.g. for	Exposure to other related disciplines	IT and information retrieval skills

	practical experience in a workplace; Testimonials and references in terms of work responsibilities.		

Once the practitioner has decided which assessment instruments to use, the level and extent of support that may be required by the candidates also becomes clear. A portfolio of evidence, for example, is a very common method used internationally for recognition of prior learning. However, putting together of a portfolio, is in itself a hard-won skill, particularly if it relates to reflecting on one's own practices. If a portfolio of evidence is the most appropriate form of assessment, then the necessary support to develop such a portfolio must be built into the support structures for applicants.

The example discussed above is by no means complete, it rather attempts to facilitate the development of an approach for RPL practice – both for qualifications based on unit standards and for qualifications not based on unit standards.

This approach will also facilitate inter-institutional and/or regional collaboration because the focus is on the outcome or results of learning. This in turn will greatly facilitate the articulation and transfer of credits intra- and inter-institutionally (Heyns, 2003).

In addition, this approach is useful not only for RPL practice, but could increasingly be used for curriculum development:

4.3   RPL and curriculum development

The nested approach used in this document, "highlights the extent to which the education and training system is changing from an inputs-based system to an outcomes-based system. It reflects how assessment and assessment practice will increasingly inform the development of curricula" (SAQA, 2002: 29). It should be clear that this approach requires a careful analysis of the knowledge, skills and values that will indicate applied knowledge and competence in a particular field of learning. The set of questions suggested in Chapter 2 then becomes relevant in terms of the 'negotiation of two worlds – the world of experience and the world of the academic' (Osman, et al, 2001), i.e.:

- How is knowledge understood?
- Who defines what counts as knowledge?
- How is knowledge organised?
- How is learning understood?
- How are experience and learning from experience understood?

- How is pedagogy understood?

Using this approach to gain an understanding of how knowledge acquired outside of formal institutions/providers may be credited against the requirements of formal qualifications, the curricula and qualifications will increasingly be enriched and informed by what is relevant in the workplace.

The SAQA RPL policy proposes the following set of quality criteria in this regard:

RPL and Curriculum Development		
Assessment and RPL practice increasingly inform the development of new standards, qualifications, learning programmes and curricula. Providers increasingly use methods of instruction and delivery to provide curricula to meet the diverse cultural, ethnic, linguistic and educational needs of learners		
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	Y	N
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 sufficiently open-ended to allow for flexible entry and exit points to enhance access and the achievement of learning goals.		
Emerging trends from assessment and RPL practice 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.		

4.4   Moderation and Review

The notion of moderation of assessment instruments is not new to education and training. Examination papers, the marking thereof and the results, were always moderated. However, increasingly institutions/providers are making use of alternative assessment methodologies, in keeping with the principle that continuous assessment, (rather than one final summative assessment), is a better indicator of applied knowledge. This calls for improved moderation systems, which takes into account the form and type of instruments used, the guidelines for the appropriate use thereof and consistent interpretation of what should be assessed.

In the *Criteria and Guidelines for the Assessment of NQF registered Unit Standards and Qualifications* (SAQA, 2001: 59), the purpose of moderation is discussed:

"Moderation ensures that people who are being assessed are assessed in a consistent, accurate and well-designed manner. It ensures that all assessors who assess a particular [set of] unit standards or qualification, are using comparable assessment methods and are making similar and consistent judgements about learners' performance".

Institutions/providers are therefore responsible for, and integral to, a moderation system, which emanates from the ETQA, but is practiced at the level of the institution/provider (referred to as 'internal moderation' in the *Criteria and Guidelines* document – p. 61).

The roles and function of the internal moderation system, are described as follows:

"Accredited providers should have individuals that manage their internal moderation systems. These internal moderators should:

- Establish systems to standardise assessment, including the plans for internal moderation
- Monitor consistency of assessment records
- Through sampling, check the design of assessment materials for appropriateness before they are used, monitor assessment processes, check candidates evidence, check the results and decisions of assessors for consistency
- Co-ordinate assessor meeting
- Liaise with external moderators
- Provide appropriate and necessary support, advice and guidance to assessors".

Clearly, the internal moderation discussed above does not apply only to RPL. It is a requirement, in terms of the accreditation of institutions/providers, and therefore will apply to all assessments conducted by the provider. This will ensure that not only RPL processes and assessments are valid, but that it enhances the overall assessment processes of the institution/provider and the sector.

Summary

In an outcomes-based approach to education and training, the assessment of the results of learning is a key indicator of the success of the learning and teaching that precedes the assessment. Assessment of applied knowledge and competence (the results of learning) provides information on a number of levels:

- The learner is informed about his/her level of attainment in relation to pre-agreed requirements for the qualification;
- The ETD practitioner derives information about his/her teaching; and
- The education and training system is informed about the strengths and weaknesses in the system

Assessment practices therefore, in order to provide valid and credible information, must be above reproach. This is true for the assessment of learning in classroom- based environments, as well as assessment of prior learning.

However, to prevent assessment from becoming a purely technical application, a holistic approach is the most appropriate, i.e. an approach that acknowledges that learning takes place within a variety of contexts, (which are not necessarily linked to each other), and therefore can not be neatly packaged in the form of modules or subjects, and that assessment is also about the preparation and support required to reach the point of assessment. With this in mind, this chapter has tried to highlight that RPL assessment is not only about the act of assessment, i.e. writing a test, demonstrating a skill, but also about capacitating people to be assessed – so that they can provide evidence of their applied knowledge.

It also highlights the critical necessity to understand **why we assess**, (i.e. to determine applied knowledge), **what we assess**, (i.e. what will tell us that a learner has achieved the applied knowledge), and **how we assess**, (i.e. making use of the most appropriate methodologies and instruments) within a broader framework. In this way, assessment becomes an important mechanism whereby we can develop improved ways of teaching and learning.

Chapter 5 will deal with quality management for RPL.

CHAPTER 5:
REVIEW AND EVALUATION: QUALITY MANAGEMENT PROCESSES

Introduction

Chapter 5 of the guideline document will particularly address the key criteria for quality assurance, which are to be built into the system. These key criteria are reflected in a number of other SAQA policy and guideline documents, and as such is in line with the principle of quality management as a critical mechanism to ensure quality improvement.

In all the official SAQA documents the point is made that quality management should not be seen as an add-on, to be conceptualized at the end of a process. Therefore, throughout this guideline document, reference is made to the need for review and quality assurance processes, including the moderation of the overall RPL process. In addition, this guideline also points out that not only assessments are moderated and reviewed, but also the tools and instruments and the staff who perform RPL functions. This is to ensure that quality management is built-in from the outset and that the criteria against which the initiative will be evaluated, are identified and incorporated from the outset.

Purpose of this chapter
This chapter intends to highlight the importance of quality assurance mechanisms and processes needed for the successful implementation of a credible and accountable RPL system. Such quality assurance processes are critical for the protection of the integrity of education and training and is a key principle of the National Qualifications Framework in terms of the quality improvement imperative.

5.1 Quality management of RPL processes

Quality assurance, moderation and review are embedded in each of the aspects discussed in this guideline document: in chapter 2, the need for pre-agreed quality assurance mechanisms as part of the organisational policy and procedures were highlighted. These are reflected in the moderation system, which is described in the policy. In chapter 3, the need for quality assurance of the assessment methods and the practices of evidence facilitators, assessors and moderators, as well as the assessment process, are described. In chapter 4, an accountable process whereby decisions are reached with regard to what should be assessed, and how such assessments should take place, were discussed. Moderation of assessments and assessment results has also been highlighted throughout the document. It should therefore be clear that quality management is not a 'once-off' occurrence, but is intended to promote quality at each stage of the process. This could be reflected as follows:

STAGE		QUALITY ASSURANCE INTERVENTION
Policy development	→	Quality assurance criteria and interventions agreed; stages and frequency of reviews clarified
Training of staff	→	Procedures established; minimum requirements defined; code of practice agreed; quality assurance in line with agreed interventions
Development of assessment instruments	→	Instruments moderated; results moderated; review of instruments, practices and processes evaluated in line with agreed interventions

Internationally, a very high premium is placed on the quality of the RPL process. As Simosko (1996: 179) states:

"In many contexts, flexible [RPL] assessment services will be a new idea. It will therefore be important for the providing centre to demonstrate on an on-going basis that it is not offering a 'cheap' or 'easy' route to credit or qualifications"

An accountable system will therefore ensure that the integrity and quality of assessments are protected. This is by no means true for RPL only - increasingly providers/institutions of education and training will be monitored and audited with regard to their assessment policies, procedures and practices. In Britain, as in South Africa, all assessments and assessment processes are under scrutiny: Simosko (1996: 97) adds that "To no small degree, the credibility of the outcome [of RPL assessments] depends almost exclusively on the validity, reliability and fairness of the assessment process". These principles have been adopted in South Africa and in future, all assessments must adhere to the following principles of good assessment (SAQA, 2001: 15 – 19):

"Fairness

An assessment should not in any way hinder or advantage a learner.

Unfairness in assessment would constitute:
- Inequality of opportunities, resources and appropriate teaching and learning approaches in terms of acquisition of knowledge, understanding and skills
- Bias in respect of ethnicity, gender, age, disability, social class and race in so far as that the assessment approaches, methods, instruments and materials do not take into account these differences
- Lack of clarity in terms of what is being assessed
- Comparison of learners' work with other learners, particularly in terms of diversity of learning styles, home language, values, gender, race, life experiences, etc.

Validity

Validity in assessment refers to measuring what it says it is measuring, be it knowledge, understanding, subject content, skill, information, behaviours, etc.

Validity in assessment would constitute:
- Assessment procedures, methods, instruments and materials have to match what is being assessed.

In order to achieve validity in the assessment, assessors should:
- State clearly what outcome(s) is/are being assessed
- Use an appropriate type or sources of evidence
- Use an appropriate method of assessment
- Select an appropriate instrument of assessment

Reliability

Reliability in assessment is about consistency. Consistency refers to the same judgements being made in the same, or similar contexts each time a particular assessment for specified stated intentions is administered.

Assessment results should not be perceived to have been influenced by variables such as:
- Assessor bias in terms of the learners' gender, ethnic origin, sexual orientation, religion, like/dislike, appearance and such like
- Different assessors interpreting unit standards or qualifications inconsistently
- Different assessors applying different standards
- Assessor stress and fatigue
- Insufficient evidence gathered
- Assessor assumptions about the learner, based on previous (good or bad) performance

Practicability

Practicability refers to ensuring that assessments take into account the available financial resources, facilities, equipment and time. Assessment that require elaborate arrangements for equipment and facilities, as well as being costly, will make the assessment system fail".

5.2   International standards

In countries where RPL has been implemented on a large scale, sets of quality standards have been developed to ensure the integrity of their RPL systems. There seems to be agreement on a number of principles. These range from academic principles, to administrative procedures and fees. The standards established in each of these contexts are intended to assist and direct quality assurance of RPL.

Consider the USA standards:

1. "Credit should be awarded only for learning, and not for experience.
2. College credit should be awarded only for college-level learning.
3. Credit should be awarded only for learning that has a balance, appropriate to the subject, between theory and practical application.
4. The determination of competence levels and of credit awards must be made by appropriate subject matter and academic experts.
5. Credit should be appropriate to the academic context in which it is accepted.
6. Credit awards and their transcript entries should be monitored to avoid giving credit twice for the same learning.
7. Policies and procedures applied to assessment, including provision for appeal, should be fully disclosed and prominently available.
8. Fees charged for assessment should be based on the services performed in the process and not determined by the amount of credit awarded.
9. All personnel involved in the assessment of learning should receive adequate training for the functions they perform, and there should be provision for their continued professional development.
10. Assessment programs should be regularly monitored, reviewed, evaluated, and revised as needed to reflect changes in the needs being served and in the state of the assessment arts."

(Whitaker,1989, p. 9 and 10)

Many providers/institutions in South Africa have adopted these standards for the implementation of RPL at their organisations.

In Britain, in addition to the standards mentioned above, 'malpractices' in terms of RPL have been identified:

"Ten APL [RPL] Malpractices to be avoided:
- Granting credits for 'time served' or just for experience.
- Basing assessment fees (Portfolio etc) on the number of credits awarded.
- Failure to focus on specific credits and programmes.
- Failing to separate the role of the APL advisor from that of the assessor.
- Promising an APL service without the regard for resources, staff development and expertise in the area.
- Having no method of checking inconsistencies and APL malpractice: offering uncoordinated and inauthentic service.
- Failing to publicly declare in advance the rules, regulations and criteria used for APL assessment.
- Failing to provide a justified transcription of APL outcomes, including sufficiency of evidence as part of quality assurance.
- Failing to give feedback to intending students.
- Promising credits and/or admission to programmes before assessment takes place. (not checking authenticity of claim)." (Nyatanga, et al, 1998, p. 9)

These malpractices have been teased out and made relevant to providers/institutions at an organisational level:

"Micro (Academic) quality:

- Ensure programmes or modules have clear learning outcomes or competencies both staff and students can base their APL assessments on.
- Ensure programme leaders and admission tutors are conversant with APL principles and their application to assessment.
- Within the institution each school or faculty should have an APL co-ordinator to enhance subject-specific debate and feedback.
- Subject teams should have a nucleus of people capable of either advising on or assessing APL claims.
- Give appropriate support and feedback to students.
- Identify strengths and weaknesses of the APL provision through (a) self-evaluation (critical peer review); (b) institutional audit of artefacts (c)students' feedback; (d) external views and external examiner feedback. External views may include professional bodies, industry and commerce and funding bodies.
- Disseminate good practice in the accreditation of prior learning" (Nyatanga et al, 1998, p. 41)

In Canada, possible barriers to the implementation of RPL have been identified and the actions taken are described as follows:

"Concerns about quality in PLAR [RPL] have been addressed in several ways in Canada:

- Standards for assessment, policies and procedures have been developed at most practising institutions.
- Educators and trainers have begun to prepare course descriptions using learning outcomes, which are clear statements about what an individual needs to know and be able to do to be successful in a course.
- Institutional faculty and staff have been trained in PLAR so that adequate support services are provided.
- Institutions have enabled faculty assessors to use a range of appropriate methods and tools in their work.
- PLAR candidates are provided with orientation to enable them to make informed decisions about undertaking an assessment.
- Community outreach activities are undertaken to disseminate accurate information on PLAR and promote services to non-traditional markets.
- National organisations have funded the development of standards for PLAR practices, quality audits and conferences promoting best practices."

(Van Kleef, 1998, p.7)

5.3   Core criteria for quality management systems

The SAQA RPL policy offers an example of a self-audit tool in relation to Quality Management Systems (SAQA, 2002: 27):

Quality Management Systems		
Quality Management Systems are in place to ensure the continuous improvement of assessment systems. The Quality Management System ensures the critical integrity of assessments and reporting and recording processes inform strategic planning requirements at provider, sectoral and national level.		
	Y	N
Quality Management Systems for assessment are designed, documented and implemented in accordance with agreed criteria and specifications		
Quality Management Systems ensure the refining of assessment policies, procedures and services at all levels and inform planning for further development aimed at meeting agreed targets		
Quality Management Systems provide for input from all key stakeholders, including representatives from the candidate community		
Quality Management Systems provide for support in meeting developmental targets, including evaluation and monitoring activities		
Evaluation and monitoring activities are clearly spelt out in the QMS documentation, including diagnostic, formative and summative activities		
Evaluation and monitoring activities ensure consistency within a sector		
Assessment documentation, re`ports and sources of evidence are maintained in accordance with agreed criteria and specifications		
RPL results are recorded in accordance with the requirements of the ETQA and SAQA's NLRD		
Information on RPL outcomes, including unsuccessful and successful applications are maintained		
The Quality Management System provides for systems to monitor the progress of candidates who enter learning programmes post-RPL		
The Quality Management System provides for analyses and reporting of services and results		

The main objectives for the establishment of quality assurance processes are to promote quality throughout the RPL process and to support the developmental targets of a provider/institution's RPL plans. Quality assurance should not be seen as an 'inspection', rather as an 'intervention' to ensure continual improvement and development. In the SAQA RPL policy (2002: 13) it is noted that:

"A developmental and incremental approach gives providers of education and training the space to explore and experiment with implementation of the [RPL] policy. This supports the need for institutions and sectors to retain their autonomy and to develop implementation plans within the constraints of their organisations while meeting the agreed requirements of the framework and criteria indicated in the policy".

Summary

A key function of a quality management system is to be able to provide information that will inform decisions and actions in the future. The key challenge for the implementation of RPL in South Africa, is the sustainability of such a system and the information made available through quality management is critical for continuous quality improvement. In addition, the development and implementation of quality management processes is in keeping with the world-wide trend of a more accountable education and training system.

Quality management therefore, is a process whereby an institution/provider/organization constantly checks whether they are meeting their pre-agreed criteria, with the purpose to identify possible problems and improve with each cycle of review.

CONCLUSION

Recognition of Prior Learning (RPL) is being introduced in South Africa in a time of intense change. Education and training are being restructured in fundamental ways, both in terms of a more equitable infrastructural spread of resources, but also in the very structure and purpose of qualifications, the curricula, learning programmes and approaches to assessment.

It is therefore not surprising that providers of education and training see RPL as yet another manifestation of the system being under threat through everything new that is being introduced. In a time when education and training in this country is under intense scrutiny and the validity and integrity of previous educational approaches and views are being questioned, RPL could easily become a victim (and not an agent) of transformation, i.e. RPL could become the 'politically correct' thing to do, which, as soon as the 'socio-political' imperatives are seen to have been met, is no longer practiced.

It is therefore critical that RPL is seen to be a process which not only values different forms of learning and gives formal recognition regardless of how the learning was achieved, but also passes the test of intellectual scrutiny in terms of the integrity and the validity of the process and becomes integral to education and training practice, particularly in the ways we assess (Heyns, 2003: 2).

For this reason, it is also important that research is undertaken as a means to encourage intellectual scrutiny and to evaluate our progress against targets for the implementation of RPL. The following is a list of possible topics, which in the short and long term will help to develop a better understanding of RPL implementation within the context of the South African National Qualifications Framework:

- What are the best assessment methodologies and processes within particular contexts?
- Developing appropriate assessment tools and instruments for RPL assessment
- How can non-traditional knowledge systems, such as indigenous knowledge, be incorporated into in curricula and assessment?
- Regional collaboration models for providers offering RPL services
- Equitable and sustainable funding for RPL
- How well is RPL being implemented?
- What are the issues with regard to RPL implementation in specific learning areas, disciplines or professions?
- What kind of curriculum innovation is possible as a consequence of implementing RPL?
- What is the size and nature of the pool of RPL candidates?
- Centralised and decentralized approaches to RPL
- National and regional approaches to RPL.
- The contribution of RPL to lifelong learning

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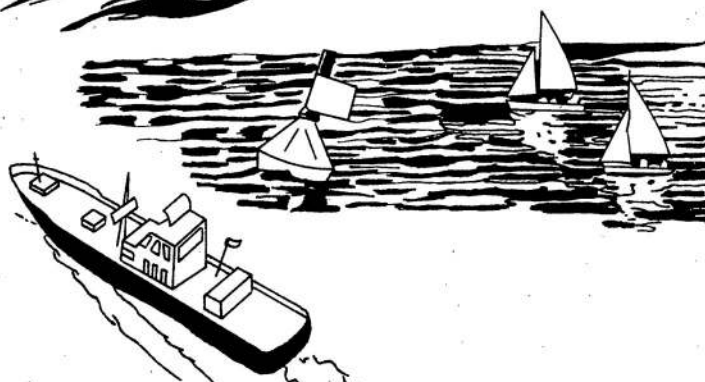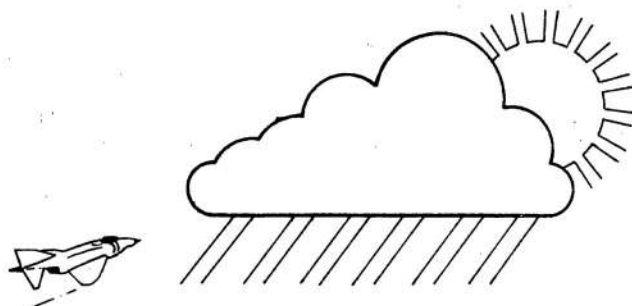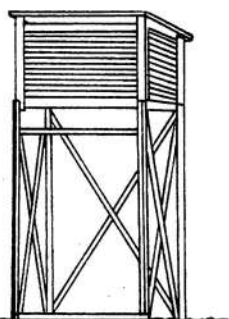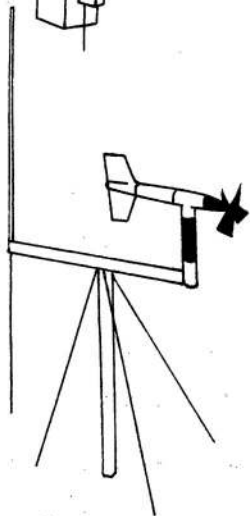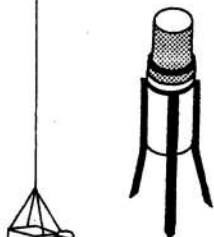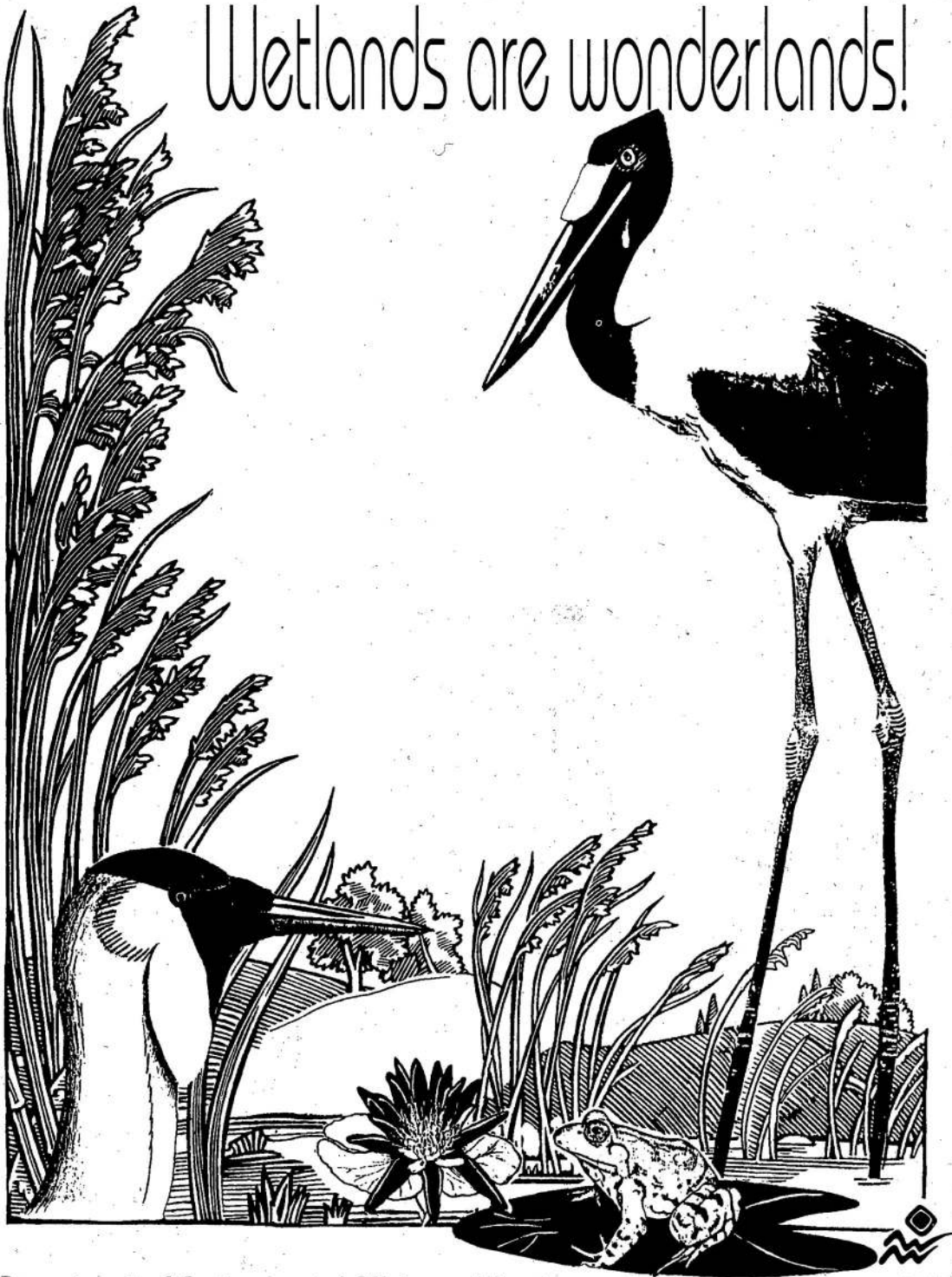
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