

***Quality management of reaccreditation processes in private higher education  
institutions in South Africa***

by

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*If you live 'quality' then automatically you will comply. (David)*

*Quality assurance is actually the heart of the institution, otherwise we can close the doors. (PHE association participant)*

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*In the name of God, the Most Powerful and Most Merciful.*

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- I dedicate this to my late brother, Adam, and my late father, Samsodien – lifelong learners.

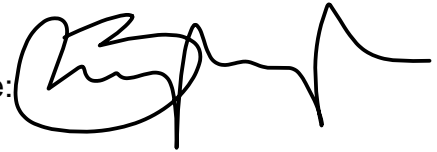
*May peace be upon you.*

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## Abstract

Private higher education institutions (PHEIs) in South Africa have to apply to the Higher Education Quality Committee for the reaccreditation of existing programmes. If a programme is reaccredited, it indicates that there is continued compliance with the accreditation criteria of the Quality Council. If not reaccredited, accreditation can be withdrawn. If not reaccredited, or if reaccredited with conditions, it implies that students are at the receiving end of a poor-quality programme. The study aimed to investigate the reasons why programmes might not be reaccredited, the challenges that PHEIs possibly face, how they might navigate and address constraints to achieve compliance, and how their efforts are sustained to ensure continued compliance. The study also served to identify the internal quality management processes and determine which mechanisms could be established or fortified to enable programme sustainability and quality enhancement. The conceptual framework for this study is the PHEI Open System Model which presumes the PHEI to be an open system. The study found that the PHEIs display as open systems whereby “input” is filtered from the external to the internal environment and catalyses the conversion of resources (“throughput”) into “output”, i.e. a reaccredited programme. A purposive sample of PHEI staff at institutions located in the Gauteng province, members of an association of private higher education providers, and members of the regulatory bodies were invited to participate. This is a qualitative study whereby data was collected through semi-structured interviews which served to investigate how PHEIs manage and experience the programme reaccreditation process.

Key words: accreditation, reaccreditation, quality assurance, quality management, private higher education institutions



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To whom it may concern

I hereby confirm that I edited Zahida Myburgh's PhD PhD thesis titled:

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Regards

A handwritten signature in black ink, appearing to be 'Aré van Schalkwyk', written in a cursive style.

Mr Aré van Schalkwyk

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<b>ACRONYMS</b>	
CHE	Council on Higher Education
DHET	Department of Higher Education and Training
HE	Higher Education
HEQC	Higher Education Quality Committee
HEQSF	Higher Education Qualifications Sub-Framework
NQF	National Qualifications Framework
PHE	Private Higher Education
PHEI	Private Higher Education Institution
SAQA	South African Qualifications Authority

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## CHAPTER 1 INTRODUCTION AND BACKGROUND

### 1.1 INTRODUCTION

This study casts attention on the management of quality assurance in private higher education institutions in South Africa. Internal quality assurance is the responsibility of the higher education institution, whereas external quality assurance of higher education is under the purview of the Council on Higher Education (CHE) which is an independent statutory body. Higher education institutions need to subscribe to the external quality assurance processes of the CHE and implement internal quality management processes in the endeavour to assure and ensure the quality of programmes that lead to registered qualifications.

In South Africa, the regulatory framework applies to public and private higher education institutions. The term “higher education institution” refers to “any institution that provides higher education on a full-time, part-time or distance basis”<sup>1</sup>. The Department of Higher Education and Training (DHET)<sup>2</sup> has oversight of both public and private higher education institutions, along with other post-school education and training (PSET) institutions, i.e. Technical and Vocational Education and Training (TVET) colleges and Community Education and Training (CET) colleges. Public higher education institutions are established or declared as such, i.e. public universities, whereas private higher education institutions need to be “registered or provisionally registered” (DoE, 1997). Private higher education institutions have to be registered companies before they can apply for registration with the DHET (DHET, 2016).

There are currently 26 public universities in South Africa, with one located in each province<sup>3</sup>, including universities of technology, traditional universities, and comprehensive universities. The number of registered private higher education institutions fluctuate as can be seen in the *Register of Private Higher Education*

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<sup>1</sup> Higher Education Act (Act 101 of 1997)

<sup>2</sup> The DHET and the Department of Basic Education (DBE) were previously combined under the Department of Education (DoE) but split into separate entities in 2009 with the Department of Basic Education responsible for schooling from Grade R to Grade 12 and the DHET for higher education and training.

(<https://www.dhet.gov.za/SitePages/AboutUsNew.aspx>

<https://www.education.gov.za/AboutUs/AboutDBE.aspx>; accessed 4 May 2021)

<sup>3</sup> (<https://www.usaf.ac.za/membership/>; accessed 4 May 2021)

*Institutions* that is published by the DHET periodically. This is due to new institutions being registered or existing institutions being deregistered by the DHET which contributes to the complex nature of the sector and makes it a dynamic system<sup>4</sup>.

All private higher education institutions are required to register with the DHET, abide by the regulations for registration and are subject to the CHE's requirements for *inter alia* programme accreditation and reaccreditation, and the policy and criteria for registration of the qualification on the National Qualifications Framework (NQF) (SAQA, 2020; DHET, 2016; CHE, 2004b, as amended). The primary interest for this study is the programme reaccreditation process, which follows programme accreditation, and is conducted in relation to the amendment of registration for private higher education institutions by the DHET<sup>5</sup>.

The following sections provide a synopsis of the rise and growth of private higher education, locally and internationally, as well as quality assurance as an established practice. There is also an overview of the private higher education sector in South Africa, and the identified need for regulation and quality assurance. For this study, it is important to know what is meant by "reaccreditation", "quality" and "quality assurance", "quality management", and "quality culture". These concepts will be clarified in this chapter.

## **1.2 PRIVATE HIGHER EDUCATION: LOCAL AND INTERNATIONAL OVERVIEW**

### **1.2.1 Private higher education: international overview**

Some scholars across the globe posit that private higher education "has become the most important aspect of global education" (Kajawo, 2020). It is regarded as playing a supportive role in the sector and adding a competitive element due to its dynamism and entrepreneurial nature (Shah & Nair, 2016).

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<sup>4</sup> In contrast to the size of the public higher education landscape, the private higher education sector has transformed considerably during the post-apartheid years. With the proliferation of private higher education institutions over this period, there were several concerns from government and other stakeholders about the quality of programmes and unscrupulous behaviour of some of these entities, many of whom were of international origin and trying to establish themselves in the country, either independently or in collaboration with local institutions (CHE, 2016, p.84).

<sup>5</sup> This study does not focus on the reaccreditation of programmes that form part of a National Review conducted by the CHE in which public institutions also participate (<https://www.che.ac.za/#/main>). This study focuses on the cyclical process that is only applicable to private higher education institutions when their registration with the DHET is up for review.

In the 19<sup>th</sup> and most of the 20<sup>th</sup> Century, higher education was mostly public (Levy, 2018). The *Trends in Global Higher Education: Tracking an Academic Revolution* report presented by Altbach, Reisberg and Rumbley at the UNESCO 2009 World Conference on Higher Education references the changes in higher education due to globalisation, internationalisation and massification. The researchers refer to Martin Trow (2006), the sociologist, who predicted “three basic stages of higher education development (as) worldwide-elite, mass, and universal access”. Trow argued 15 years ago that most nations would move towards mass participation, albeit in different timeframes, which is what has happened in the higher education sector. The expansion of higher education is attributed to social, economic, and political factors and, consequently, increased demand for access as higher education is viewed as the gateway to social mobility and economic success (*sic*).

With the expansion in the higher education sector, the private sector in most countries has been absorbing some of the demand. The number of private higher education institutions has increased over the past 50 years as the over-reliance on the public sector led to a greater need for a dual-sector system (Levy, 2018). Even though considered to be the “fastest-growing sector worldwide”, it is characterised by “very little strategic planning” (Altbach *et al.*, 2009, pp.44-45). While public higher education institutions across the world were generally formed under some form of government control, the private sector sprouted and mushroomed with increased measures having to be put in place by government through regulatory frameworks to ensure legitimacy and quality (Kinser & Lane, 2017; CHE, February 2018).

Buckner (2017) indicates that private higher education distinguishes itself from public education in three ways, i.e. i) legal ownership, ii) funding, and iii) contribution to society. Generally (and also the case in South Africa) private higher education is tuition fee-dependent and thought to operate in competitive markets (*ibid*).

### **1.2.2 Private higher education in South Africa**

Private higher education in South Africa is not funded by the government but is subject to government regulation. Private higher education institutions in South Africa are autonomous institutions “located outside of the DHET, that do not receive funds from the DHET, but for which the DHET has certain legislative functions” (DHET, 2021b, p.20). The fact that there is no subsidisation of private higher

education, even in the form of NSFAS<sup>6</sup> funding for students to enable access across the sector, contradicts the notion of a single, coordinated higher education system with a transformation agenda as espoused in White Paper 3 of 1997 (RSA, 1997), precursor to the Higher Education Act<sup>7</sup>. White Paper 3 of 1997, “A Programme for Higher Education Transformation”, stated the aim of transforming the higher education system into a single coordinated system. The intention was for the government to conceptualise, plan, govern, and fund the single coordinated system. The DHET (RSA, 2013, p.42) indicates that the private sector is funded by “client contracts, owner’s capital, company or SETA<sup>8</sup> training budgets, user fees and donor funds”.

The heterogeneous private higher education providers in the South African landscape are distinct in size, scope, and duration, amongst other factors (CHE, February 2018). Some institutions are not-for-profit organisations whereas others are “enterprise-driven”; and fees range from low to high, even more than what a public institution would charge for a programme (CHE, February 2018).

In South Africa, private higher education was an initial response to the demand from the predominantly white demographic for “better education” (Tamrat, 2017). McKenna *et al.* (in CHE, 2016, p.149) reference Mabizela who iterates that higher education in South Africa started as private education and that many “well-established public universities began as private institutions”.

Webbstock (in CHE, 2016, p.6; February 2018) indicates that in 1999 there were 300 private higher education institutions in South Africa, but that this number was reduced with the introduction of regulations in 2002 and levelled out to approximately 110 to 120 registered institutions in the past ten years. Private institutions have “mutated” and “adapted” resulting in diverse entities “in both form and purpose” (McKenna *et al.*, 2016, p.149). McKenna *et al.* (in CHE, 2016, p.148) indicate that

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6 National Student Financial Aid Scheme which is mainly funded by government

<sup>7</sup> The White Paper called for “increased diversity of provision” and a higher education system that would be responsive to the needs of citizens, employers, and “broader societal and developmental objectives of the country”, and cooperation between institutions and employers for employability (Saidi, 2020). It can be argued that the private higher education sector aligns with these objectives. Nonetheless, the sector is marginalised by the government (see a PHE association participant’s view later in the discussion).

8 Sector Education and Training Authority

the private higher education sector grew post-1994 which included the appearance of several foreign providers when sanctions were lifted. Many of these institutions were “fly-by-night” ones, in other words, a fleeting presence in the sector.

Several “unscrupulous providers” have plagued the sector, purporting to be registered and offering accredited programmes (RSA, 2013, p.43). Registered providers have also acted in an unscrupulous fashion by offering unaccredited programmes which have added to giving the private sector an unsavoury reputation and misleading students (*ibid*). The DHET (2021c) indicates that the *Register* of 20 August 2019 lists 87 unregistered institutions that purport to offer higher education. Together with the South African Police Services (SAPS), the DHET has managed to close some of these institutions; however, the investigation by SAPS is an ongoing process as more institutions emerge (*ibid*).

In the White Paper<sup>9</sup> on post-school education and training, the DHET groups private higher education and further education and training institutions together in its discussion on the “private sector”. The White Paper (p.42) indicates that the private higher education sector assists in the diversification and expansion of the post-school sector, particularly through catering for niche area provision, such as “advertising, design, fashion and theological training...film and television”. There are also other offerings, such as education, business and management, and information technology. Nukunah *et al.* (2019) posit that the private higher education mission is to meet specific needs, niches, and customer service. The programme offerings are sometimes tailor-made to meet corporate needs (*ibid*).

Many private higher education institutions started by offering “low-cost” undergraduate programmes (CHE, 2016, p.84; Tamrat, 2017). However, the range of subject field offerings has expanded, to the extent of offering engineering or other programmes that require specialist equipment and/or laboratories (DHET, 2 August 2021). It should be determined whether there is adequate provision of these resources for quality programme delivery, or whether the profit imperative overshadows or supersedes the academic concern and whether making money from education is more important than putting money into education.

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<sup>9</sup> (RSA, 2013, p.42)

### 1.2.3 Registered private higher education institutions in South Africa

The current *Register* (DHET, 13 September 2021) indicates there are 93 registered and 40 provisionally registered private higher education institutions, bringing the total of operational institutions to 133. The *Register* further reflects seven institutions for which registration has been cancelled, with the right to appeal; 93 for which registration has come into effect; and 10 institutions that have requested deregistration. Registered private higher education institutions are spread across all the provinces, except the Northern Cape.

The current *Register* indicates there are 42 registered and 21 provisionally registered private higher education institutions in Gauteng, where this study is focused, totalling 63 out of 133 (i.e. 47,37%) – nearly half of the private providers concentrated in one province. In the Western Cape, there are 29 registered and 10 provisionally registered institutions – totalling 39/133 (29,32%). The largest number of operational providers are thus concentrated in these two provinces. The institutions might have more than one site of delivery across provinces. For instance, the largest private higher education institution has 132 registered programmes and 27 sites of delivery, with its main site in Randburg, Gauteng. One programme could be offered on as many as 18 sites of delivery.

The DHET *Register* (13 September 2021) lists programmes in nursing, sport, coaching and fitness, hospitality and travel and tourism, marketing, journalism, law, engineering, social science, psychology, and somatology, among others, which illustrates a wide array of subject offerings. This disputes the claim that private higher education is concentrated in a small number of study fields (Nukunah *et al.*, 2019). This might have been the case with the advent of private higher education in the country when “low-cost” programmes were the starting point. The programmes currently on offer span the spectrum of qualification types on the Higher Education Qualifications Sub-Framework (HEQSF) on the 10-level NQF – from the Higher Certificate (at level 5) to Doctoral Degree studies (at level 10). Doctoral Degree offerings are uncommon, though, with only 13 programmes across 10 registered institutions. The DHET (2021c, p.33) reports that, in 2019, private higher education institutions offered 804 programmes on the HEQSF.



Several private higher education institutions also offer programmes in the further education and training and/or occupational qualifications sector and/or short courses (cf. *The List of Registered Private Colleges*, 9 September 2021; p.91, 115, 117, 150 & *DHET Register*, 2 August 2021, p.69, 85, 130-131; DHET, 2021c, p.33)<sup>10</sup>. With different types of offerings on hand within one institution, it should be considered how resource provisioning is spread, particularly in light of the fact the CHE requires that adequate resources are dedicated per programme for quality higher education programme delivery (CHE, 2004b, as amended). The institution is compelled to ensure adequate and appropriate infrastructure, facilities, and resources to achieve and retain programme accreditation and maintain registration if it wishes to continue operating. Section 21 of the *Regulations for the Registration of Private Higher Education Institutions* (DHET, 2016) indicate *inter alia* that, to maintain registration, the institution must: i) continue to fulfil the requirements for registration; ii) concerning all of its higher education programmes, comply with the requirements of the Higher Education Quality Committee (HEQC); and iii) undergo an evaluation by the registrar at intervals to be determined by the registrar. For the Registrar to determine compliance with the requirements of the HEQC, private higher education institutions have to submit existing accredited programmes for evaluation during the reaccreditation process conducted by the CHE (CHE, 2004b, as amended). The outcome of the process is communicated to the DHET, and the Registrar will consider the outcome in the amendment of registration. Section 17(2) of the *Regulations for the Registration of Private Higher Education Institutions* (DHET, 2016) indicates that “If the HEQC withdraws accreditation from one or more of an institution’s programmes, the registrar must review the institution's registration – or provisional registration in terms of section 62(2) of the Act and determine whether reasonable grounds exist for cancellation”.

The recent report by the DHET (2021c) on the compliance of private institutions to maintain registration during the 2019 reporting year indicates that the HEQC withdrew the accreditation of several programmes offered by some institutions, for various reasons, and in the case of one institution, this resulted in the withdrawal of registration. It is stated in the report that “Continued accreditation by the CHE serves

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<sup>10</sup> <https://www.mbse.ac.za/qualifications/>; <https://www.iqacademy.ac.za/courses/>;  
<https://www.msceducation.co.za/group-structure/msc-artisan-academy>

to ensure that the institution continues to provide quality higher education on par with that offered at public universities” (DHET, 2021c, p.29). The programmes on offer by private and public institutions are evaluated in terms of one set of accreditation criteria<sup>11</sup>. However, the diverse private higher education sector presents a challenge for external quality assurance. A one-size-fits-all approach cannot be adopted, as the CHE recognises in its new Quality Assurance Framework (2021). The quality of a public university programme appears to be the benchmark. This is debatable as each programme needs to be “fit for purpose”. The benchmark would then be the threshold standards of the accreditation criteria. The CHE (2021a, p.21) defines quality assurance as follows:

*“Quality assurance in higher education in South Africa involves evaluating and providing evidence of the extent to which institutions have put in place the measures needed to achieve i) the goals and purposes they have identified for themselves and ii) programmes that are able to deliver a set of learning experiences which will support students in attaining the qualifications to which they lead.”*

Westerheijden, Stensaker and Rosa (2007, p.6) indicate that the main goals of quality assurance should be accountability and quality enhancement. Intrinsic in the notions of “accountability” and “improvement” would be accepting responsibility for quality assurance, taking ownership of processes, and making the effort to reflect and review with a view on quality enhancement.

The need for quality assurance in higher education has been identified across the world. The section below provides an overview of quality assurance as an established practice worldwide, and in South Africa.

### **1.3 QUALITY ASSURANCE IN PRIVATE HIGHER EDUCATION**

#### **1.3.1 Quality assurance in private higher education: international overview**

Blanco-Ramirez and Berger (2014; p.90) posit that “nearly every nation has developed a national system for quality assurance in higher education”. According to Hoosen, Chetty and Butcher (2017, p.9), quality assurance was introduced into global higher education systems about 20 to 30 years ago. Hoosen *et al.* (2017, p.27) indicate that the increased number of private higher education institutions gave rise to concern about the “declining quality of higher education”, which precipitated

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<sup>11</sup> CHE, 2004b, as amended

the need for government regulation in the Southern African Development Community (SADC) which comprises 15 countries in the southern region of Africa (<https://www.sadc.int/about-sadc/overview/sadc-facts-figures/>).

The oldest systems of quality assurance started in the United States of America and the United Kingdom more than a century ago (Kinser, 2014, p.55). The current form of quality assurance practice in the US started in the 1950s and 1960s whereas the UK started in the 1990s (*ibid*). The first “wave” of quality assurance in the US comprised external quality assurance agencies that operated outside government control (Kinser & Lane, 2017).

Several global trends served as the driving force for the expansion of quality assurance across the world (Kinser, 2014, pp.55-56). Firstly, the diversification of higher education systems led to more, and different types, of higher education institutions and along with this came greater demand for access. Quality assurance was a means of providing information about the (quality of) various choices available. The proliferation of private higher education entities around the world led to the third quality assurance “wave” which started in the 1990s (Kinser & Lane, 2017). Another trend was increased internationalisation in higher education whereby the appearance of foreign providers required greater vigilance to prevent “fraudulent actors” from taking advantage of the local student population (Kinser, 2014, p.56). Garwe and Gwati (2018) indicate that current developments in higher education have served as impetus for the establishment of national quality assurance bodies to regulate and promote quality. The driving forces include marketisation, globalisation, accountability demands, fraud and corruption, and dubious quality assurance practices.

The expansion of quality assurance was evident in the establishment of the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) in 1991, comprising eight members (Kinser & Lane, 2017). Bhengu, Cele and Menon (2006) cite INQAAHE’s 2005 statistic which indicates more than 70 quality assurance agencies in the world at that time. Today, INQAAHE has more than 300 members<sup>12</sup>.

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<sup>12</sup> (<https://www.inqaahe.org/membership>; accessed 1 October 2021)

In the early 2000s, seven quality assurance agencies were established in Africa, including the CHE (Bhengu *et al.*, 2006). The African Quality Assurance Network (AfriQAN) and INQAAHE are regional and international bodies that promote networking, cooperation, and exchange among quality assurance agencies to converge the systems in terms of international benchmarking of standards and procedures and catering for developments in the field (Garwe & Gwati, 2018).

The Southern African Quality Assurance Network (SAQAN) has been established to facilitate harmonisation and the enhancement of quality in the region through the sharing of experience, best practice, and strategy. SAQAN recognises work done by the Southern African Development Community (SADC) through, for instance, the SADC Technical Committee on Certification and Accreditation (Garwe & Gwati, 2018). The issue of quality is considered vital for revitalising and strengthening African higher education (Singh, 2011).

Kinser (2014, p.56) indicates that quality assurance became a means to differentiate between legitimate and illegitimate private higher education providers. Kinser and Lane (2017, p.3) indicate that, globally, “bad actors” emerged in the private sector, seeking to “capitalize on the eagerness of prospective students to earn a degree”. As a consequence, the government’s role at present includes “assuring ongoing quality of the educational experience”. Whereas before quality could be assumed, it could no longer be guaranteed due to the diverse nature of private higher education institutions and the presence of “bad actors” (*ibid*).

The term “bad actors” could be contentious as it taints the whole private sector whereas many private providers might have worked hard to secure a good reputation. A case in point could be an established institution in the South African private higher education landscape that has a track record reflecting sustainability and reliability, and retention of its accredited programmes. The *Register of Private Higher Education Institutions* published by the DHET over many years would be a testimony to that.

Groen (2017) iterates that “key stakeholders (such as students, parents, society and governments) in higher education are taking a greater interest in the student experience and the quality of higher education”. Beerkens and Udam (2017) indicate that:

*“Stakeholders’ needs and expectations have thus taken a prominent place in quality assurance. Quality assurance agencies seem to be well aware of this development and they explore how they can better serve the needs of different stakeholder groups.”*

Governments have introduced agencies for oversight of higher education institutions to ensure the value of a qualification for both students and parents (Kinser & Lane, 2017). The concerns about current higher education provisioning encompass quality, standards, effectiveness and efficiency, accountability, and transparency (Hazelkorn, 2018). By having a set of quality assurance guidelines and/or standards, stakeholders would be encouraged to have trust in the system and the quality of the programmes that are provided and the degrees that are conferred (Hoosen *et al.*, 2017, p.9).

### **1.3.2 Quality assurance in private higher education in South Africa**

The concern about quality in the private higher education sector no longer being a given is valid for South Africa in light of the Registrar’s reasons for cancelling the registration of a private provider. These include fraudulent behaviour, not meeting registration requirements (which could encompass non-adherence to the requirements of the HEQC) and institutional owners or directors being convicted of an offence<sup>13</sup> (DHET, 17 March 2020, p.9). The presence of unscrupulous providers in the South African higher education arena highlights the need to have the sector regulated. One of the means to protect students is for private higher education institutions to ensure ongoing compliance with the criteria for programme accreditation stipulated by the CHE.

South Africa’s current quality assurance system came into being in the late 1990s through the promulgation of the Higher Education Act (101 of 1997). As the Quality Council for higher education, the CHE has to assure and ensure quality programmes in the system. As per the Higher Education Act<sup>14</sup>, the Quality Council<sup>15</sup> should

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<sup>13</sup> cf. (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2017): “the presence of fraud, predatory lending and exploitative practices highlights the importance of sensible regulations and effective quality assurance”.

<sup>14</sup> cf. Section 27(i)(iii), Act 101 of 1997

<sup>15</sup> The National Qualifications Framework (NQF) Act (No.67 of 2008, as amended) makes provision for three quality councils in South Africa, viz. UMALUSI which is the Quality Council for General and Further Education and Training (as provided for in the GENFETQA Act); the QCTO, which is the Quality Council for Trades and

“ensure that such quality assurance as is necessary for the sub-framework is undertaken”. The DHET indicates, though, that Quality Councils are under-resourced, have limited scope and do little monitoring which means there is insufficient capacity and oversight to ensure private providers are held accountable (RSA, 2013, p.43). It is a contradiction in terms if the oversight body cannot carry out its mandate adequately.

The CHE, through its standing committee, the HEQC, performs external quality assurance functions, *inter alia* programme accreditation and audits of the quality assurance mechanisms at higher education institutions (known as “institutional audits”), as part of its legislative mandate under the Higher Education Act<sup>16</sup>. This study will be focusing on the programme reaccreditation process that is conducted by the CHE as part of its mandated programme accreditation function.

## 2. PROBLEM STATEMENT

As outlined above, private higher education institutions are regulated by the government. However, despite regulation<sup>17</sup>, there is a disparity in the quality of higher education programme offerings. An increase in the number of institutions, diversity of the private higher education sector, and its constant state of flux, creates a situation where “quality” is not guaranteed. The evolution of private higher education is a worldwide phenomenon, and its growth and expansion and diverse nature has given rise to concerns about quality. In the South African context, the CHE’s role as an external quality assurer can thus be seen to determine the quality of programmes in a shape-shifting sector to assure stakeholders and protect students. For instance, if a student were to enrol in a sub-standard (poor quality) programme, it would mean that he/she is at risk of not developing the graduate attributes or competencies required for further study or employment. Thus, the CHE has to ensure that a quality programme is accredited and that the quality is maintained.

The fact that programmes were initially accredited indicates that there was initial technical compliance in terms of meeting the minimum standards of programme

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Occupations (provided for in the Skills Development Act); and, under Section 24, the Council on Higher Education which is the Quality Council for higher education (provided for in the HE Act).

<sup>16</sup> (Act 101 of 1997, as amended)

<sup>17</sup> (RSA, 1997; CHE, February 2018; DHET, 2016; CHE, 2004a & 2004b, as amended)

input criteria (CHE, 2004b, as amended). If reaccredited, this could point to ongoing compliance in terms of process and output, and indicate impact through programme review (CHE, 2004b, as amended). Programmes that are reaccredited with conditions or for which accreditation is withdrawn could point to areas where there is neither technical nor substantive (actual) compliance.

The CHE, therefore, conducts the process of programme reaccreditation to determine whether programme quality is sustained. Only those programmes that meet the criteria for accreditation are retained in the system. When private higher education institutions submit programmes for reaccreditation by the HEQC and a programme is reaccredited with conditions, this process outcome indicates areas in need of improvement, either at the institutional or programme level. A negative outcome of the process is that programme accreditation can be withdrawn. This could cast aspersion on the quality of the institutional suite of offerings. The problem is that if a student is enrolled on a programme where partial compliance with quality standards is detected, the student is being disadvantaged and placed at risk.

The risk is compounded if there is non-compliance and programme accreditation is withdrawn. This could lead to upheaval or disruption during the academic year. Arrangements have to be made for students to be “taught out” on the affected programme or they have to be placed at another institution to complete their studies if the situation at the enrolling institution is dire (cf. Section 17A, DHET, 2016; DHET, 3 February 2020). The institution, if all its programmes are affected, risks losing its registration with the DHET. The deregistration of private higher education institutions occurs for various reasons, which includes the failure of some providers to comply with the HEQC’s threshold quality standards (DHET, 3 February 2020 & 17 March 2020). This could lead to uncertainty and mistrust in stakeholders as the quality of a qualification is brought into question.

If there is uncertainty and distrust in the qualifications on offer in the private higher education sector, the opportunities for articulation, mobility and employment, both locally and globally for graduates, become limited. If the requirements for accreditation are not met and sustained, the academic welfare of students is placed at risk – this against the backdrop of the NDP2030 (2011) which indicates the need for an education system wherein “further and higher education and training ...



enables people to fulfil their potential”. This would defeat the aim of redress for social justice.

Given the limited research on private higher education institutions in South Africa, and limited research on the programme reaccreditation process, it is not clear which quality management processes are in place to ensure and assure the quality of programme offerings. It is also not clear how private higher education institutions address the constraints that might be encountered in their efforts to ensure compliance with the requirements of the HEQC.

The overarching concern is that students need to be protected from providers that offer programmes that do not meet the quality requirements as these would make them the recipients of a sub-standard higher education programme. The latter would detract from the learning experience, and not equip the student with the graduate attributes necessary to enter the world of work or access further study.

### **3. RATIONALE FOR THE STUDY**

The private higher education sector is dynamic and there should be an understanding of the various factors that impact it. There might be structural or systemic constraints unique to a private higher education institution or the private higher education sector, and it is of interest to note how these constraints could be mitigated or transcended within the quality assurance framework in which all higher education institutions are expected to operate. Although quality assurance is the responsibility of the private higher education institution as outlined in the HE Act (1997), it is not clear to what extent these institutions accept responsibility for their quality assurance processes and how they manage these internally. It is not clear which quality management processes are in place to facilitate the achievement of compliance with the criteria for programme accreditation (CHE, 2004b, as amended). Hoosen *et al.* (2017, p.151) indicate that “there are very few people who understand the entire QA framework ‘in all its complexities’ in SA”.

In the South African higher education system, the responsibility for programme design, teaching and learning, assessment, and provision of appropriate facilities, resources, infrastructure and staffing rests with the institution. If there is no, or a limited, sense of responsibility and accountability, there is a risk of a laissez-faire attitude which would not bode well for a higher education system which is



characterised in the NDP2030 as a “low participation, high attrition system” (National Planning Commission, 2011).

It has been found that knowledge of the private higher education sector is limited. Stander and Herman (2017) identified the need for more studies on the private higher education sector. Tamrat (2017) indicates that information on this sector is in most cases “limited, patchy, and anecdotal”. Tamrat (2017) further states that research in this area is characterised by “static images and stereotypes” around issues of quality, academic standards, programme offerings, inadequate infrastructure, staffing and lack of research output. Considering its diverse nature, it would be imprudent to generalise and stereotype the private higher education sector in South Africa. This sector is diverse and fluid and only research will highlight specific challenges faced by private providers and the current state of the sector.

The professional interest in this study is motivated by my role as manager of the programme accreditation process. It has been noted that often programmes do not meet the accreditation criteria outright which results in accreditation with conditions. It would be of interest to find out which conditions are stipulated for programme reaccreditation. This will provide insight into the barriers or constraints, whether presented as structural or systemic, and how these are navigated to sustain compliance.

The study will add to knowledge on the private higher education sector, and the internal quality management processes employed by institutions. The study will serve to indicate whether private higher education institutions are capable of navigating the constraints with which they might be presented, how they transcend these – if at all – to achieve programme reaccreditation in terms of the minimum standards for programme quality as encapsulated in the CHE’s accreditation criteria.

#### **4. RESEARCH AIMS/PURPOSE STATEMENT**

The study aims to investigate the reasons why programmes might not meet the minimum standards of the accreditation criteria to be reaccredited, the challenges that private higher education institutions face, how they might navigate and address barriers or constraints to achieve compliance, and how they sustain their efforts to ensure continued compliance.

The aim is also to identify the internal quality management processes and determine which mechanisms have been established or fortified to enable the sustainability and quality enhancement of a higher education programme.

Due to COVID-19 lockdown restrictions, the study was conducted virtually on the Zoom platform. Individual interviews were conducted with a purposive sample of participants from the Department of Higher Education and Training, Council on Higher Education, South African Qualifications Authority, members of a private higher education association, and staff of seven private higher education institutions primarily located in the Gauteng province.

## **5. RESEARCH QUESTIONS**

### **5.1 Primary/Main research question:**

How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?

### **5.2 Secondary/Sub-research questions:**

5.2.1 How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?

5.2.2 How does the PHEI navigate possible constraints or barriers to achieve the reaccreditation of a programme?

5.2.3 Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?

## **6. CONCEPT CLARIFICATION**

### ***Quality***

“Quality” has various connotations. Harvey and Green (1993) postulate that “quality” is regarded as “exceptional, as perfection (or consistency), as fitness for purpose, as value for money and as transformative”. The authors found that “quality” can be “distinctive” (as in excellence) or “exceptional” when “passing a set of required (minimum) standards” (Harvey & Green, 1993). They further posit that “quality” is a “slippery concept”, being such a contentious issue where some hold the view that there is a threshold by which it can be measured or judged (for example, meeting or exceeding a national standard), while others argue the contrary, stating that it is relative to the process that yields the desired result or outcome. The questions that

arise then are whether the quality is quantifiable or measurable and, being “relative”, whether it can be absolute. Another view is that “if a product or service consistently meets its maker’s claim for it then the product has quality, irrespective of any absolute threshold” (*ibid*). The authors furthermore find “quality” to be a “value-laden term”, associated with notions of “good” and “worthwhile”. These terms are subjective, and a means of “validation” or “justification” would be to link it to an activity (Harvey & Green, 1993). To validate the notion of a “quality” higher education programme, it would then be logical to link it to a quality assurance activity such as accreditation, whereby the programme has to meet the minimum standards of the accreditation criteria.

Furthermore, the notion of quality is not static. It evolves depending on educational, economic, social, and political developments and context. In this study, the empirical evidence reveals that participants regard a quality programme as one that meets the need of industry or the professional body. Quality is thus linked to institutional context as each role-player might have a different view of quality. Having a programme accredited or reaccredited by the HEQC is a mark of quality.

The CHE (2021a) equates quality to: “i) fitness of purpose based on national goals, priorities and targets, and the institution’s understanding of and engagement with these; ii) fitness for purpose in relation to the higher education institution’s specified vision, mission and strategic and academic planning in relation to diversity and differentiation in the South African higher education sector; iii) value for money in relation to effectiveness and efficiency in relation to a range of parameters; and iv) transformation as it refers to social equity, quality and fundamental institutional cultural and academic change”.

Quality can also mean “doing the right things well” (Harvey & Green, 1993). It could also be a matter of doing the right things well *all the time*, i.e. consistency.

This study will define “quality” as “conformance to requirements” (Stensaker, 2007) in the sense that there are minimum requirements to be met (“passed”) per accreditation criterion for the programme to be reaccredited. This essentially means that “quality” in the focus of this study is equated to compliance and consistency. This is a narrow view that suits the scope and size of the study. Anything that is revealed beyond a compliance perspective could point to substantive or actual

quality which would be illustrative of a quality culture within the institution, and/or functional quality management processes that enable reflexive practice and qualitative change for the enhancement of programme quality, thus not merely a paper-based exercise or ticking all the right boxes for “passing”.

### **Quality assurance**

Quality assurance<sup>18</sup> “describes all activities within the continuous improvement cycle (i.e. assurance and enhancement activities)” (ESG 2015). It is defined by Parsons (2017) as “all the planned and systematic actions necessary to provide adequate confidence that a product or service will satisfy given requirements for quality”.

The CHE (2021a, p.21) defines quality assurance as follows: “Quality assurance in higher education in South Africa involves evaluating and providing evidence of the extent to which institutions have put in place the measures needed to achieve i) the goals and purposes they have identified for themselves and ii) programmes that are able to deliver a set of learning experiences that will support students in attaining the qualifications to which they lead.

### **Quality culture**

Quality assurance is contextual and, if integrated, requires the input of all role-players at a higher education institution for a quality culture to exist (Cardoso, Rosa & Stensaker, 2016). Within a quality culture, there is collective responsibility and involvement at the managerial and grassroots level (Bendermacher, Oude Egbrink, Wolfhagen & Dolmans, 2017).

The development of a quality culture is characterised by a balanced top-down and bottom-up approach or initiatives, as well as “communication, participation and trust” (Bendermacher *et al.*, 2017). Harvey and Green (1993) define a quality culture as follows: “A quality culture involves a devolution of responsibility for quality. The organisation is reduced to a system of interrelated nodes (a single person or small team). Each node has inputs and outputs. These are the quality interfaces...”.

The aforementioned definitions indicate that for a quality culture to exist, quality assurance cannot function as an individual concern, nor can it exist in a silo or vacuum. It is implied that there would need to be interrelated, interactive

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<sup>18</sup> See previous definitions as well.

relationships (between people and processes) within an organisation or a system for a quality culture to be evident and intrinsic. The term “quality culture” is intangible and cannot be measured, but it can manifest in the organisation in the form of a quality strategy and quality management system that identifies the “quality work” of individuals and teams at all levels of the organisation, thus the collective effort of internal stakeholders to manage quality assurance for the achievement of a quality product.

### ***Quality management***

According to Parsons (2017), quality management refers to the appropriate quality assurance controls “that can be applied in all key areas and to all stages of supply of the product or service”. Quality management enables the quality assurance function.

Brookes and Becket (2007) indicate there is no universal consensus on how to best manage quality in higher education. This has led to the adoption of different quality management practices within countries and their higher education institutions (*ibid*).

### ***Quality management system***

The CHE (2021c, p.8) defines a quality management system as follows: “Quality management system refers to the institutional arrangements that assure the quality of learning and teaching, assessment, research, and community engagement. Such an integrated, internal system supports, develops, enhances and monitors the institution’s delivery of the core functions of higher education”.

Weideman (2008) refers to Hoyle’s succinct definition of a quality management system: “Implementing a quality management system involves directing and controlling an organisation with regard to quality”.

Krehbiel and Miller (2018) posit that a quality management system is a formalised system that “documents the structures, responsibilities and procedures required for effective quality management”.

### ***Quality enhancement***

The CHE (2021a, p.22) defines quality enhancement as “The development and implementation of initiatives by an institution to raise its standards and the quality of its provisioning beyond threshold standards and benchmarks”.

### ***Reaccreditation***

The CHE (2004b, as amended) defines reaccreditation as “Accreditation of an existing programme”.

## **7. OVERVIEW OF CHAPTERS**

The remaining chapters in this thesis are set out as follows.

### **Chapter 2**

This chapter covers the literature review with a focus on private higher education, locally and internationally, and the current state of private higher education in South Africa. The chapter also provides an overview of quality assurance in higher education, and the different types of quality assurance with a specific focus on accreditation.

### **Chapter 3**

The General System Theory is used as the basis for the conceptual framework of this study. Chapter 3 provides an overview of the Systems Approach and a discussion on the conceptual framework, which is the PHEI Open System Model. This chapter situates the study within the conceptual framework, namely the PHEI Open System Model, which adopts a systems approach.

### **Chapter 4**

Chapter 4 outlines the methodology and methods for the study, research design, research ethics, and limitations and delimitations of the study.

### **Chapter 5**

This chapter presents the data and findings on the regulation of the private higher education sector in South Africa and its current state, and the programme reaccreditation process.

### **Chapter 6**

This chapter presents the data and findings on internal quality management and whether the private higher education institution can be viewed as an open system in terms of the conceptual framework.

### **Chapter 7**

The final chapter of this dissertation presents the conclusion and recommendations based on the findings.

## CHAPTER 2

### LITERATURE REVIEW: PRIVATE HIGHER EDUCATION

#### 2.1 INTRODUCTION

This chapter provides an overview of private higher education locally and internationally, and current trends in the private higher education sector. It also provides an overview of quality assurance as established practice and the application of accreditation and reaccreditation, barriers or constraints that may be experienced by private higher education institutions in achieving compliance, and current trends in quality assurance.

#### 2.2 PRIVATE HIGHER EDUCATION: LOCAL AND INTERNATIONAL OVERVIEW

##### 2.2.1 The growth of private higher education

Tamrat (2017) indicates that the proliferation of private higher education institutions, in many parts of the world, started in the 1990s. It is further indicated that the “first wave of PHE growth” started before that with the emergence of religious institutions (mainly Christian).

According to Kajawo (2020), there are several reasons for the emergence, growth and expansion of private higher education, including the following: 1) to provide access to higher education due to increased demand and thus augmenting government efforts (in which case rising demand outstripped “governments’ willingness or ability to finance it” [cf. Levy, 2018]); 2) failure of public higher education institutions to provide quality education which called for an alternative in some countries, particularly in Africa; 3) the impetus of religious organisations to provide higher education to their members and religious leaders, for example, the Roman Catholic Church; 4) being private investments to yield profit, they are viewed to be efficiently managed and deemed to offer quality higher education, for example, Harvard and Yale in the United States of America which are considered to be two of the best universities in the world.

Private higher education also caters for those who prefer not to attend public institutions, or do not qualify for entry, and it meets the need for differentiated demand (Altbach, Reisberg & Rumbley, 2009, p.45; Tamrat, 2017). For example, it caters for lack of availability (as in Russia or Eastern Europe where some



programmes were not offered in the public sector under communist rule), for “niche” area/specialisation demand or in response to a demand from the elite for ‘quality’ education (Dittrich & Weck-Hannemann, 2010; Tamrat, 2017). Kinser (in Kinser *et al*; 2010, p.3) indicates that private higher education distinguishes itself from public institutions through either offering a different curriculum, or having a particular religious or cultural emphasis, or another distinctive characteristic. It is perhaps the case that ethnic minority groups wish to maintain or promulgate their identity and language (*ibid*). This phenomenon exists in the South African private higher education landscape with certain institutions absorbing a predominantly Afrikaans-speaking student population or those that are rooted in a particular faith, for example, Christian or Muslim (DHET, 2 August 2021). Private higher education has also responded to employers’ demands for an adaptable workforce that is responsive to conditions driven by advanced technology (Shah, Vu & Stanford, 2019).

As outlined above, it is evident that several factors contribute to the continuous expansion of private higher education globally, and even rapidly in some areas. For example, in 2008, there were more than 500 private universities in Japan; in 2014, there were 727 private institutions in China; and in 2016, India had 229 private universities (Kajawo, 2020). In Russia, by 2010, private higher education institutions (which were non-state funded) accounted for nearly half of all higher education institutions (EUA, 2010). Hazelkorn (2018) indicates that by 2009, 31% of students worldwide were enrolled in private higher education. By 2009, the private sector was educating more than half of the student population in some South American countries; was expanding in central and eastern Europe, in countries of the former Soviet Union and Africa; and had a significant presence in India and China (Altbach *et al.*, 2009, p.14). The perception of private higher education as being prestigious was already being debunked because, although there were several “selective” or elitist institutions by 2009, it was already catering to the masses (*ibid*).

In 2019, a conservative estimate of private higher education enrolment was 75 million worldwide (Levy, 2019). Levy (2018) indicates there has been “spectacular growth to a third of global enrolment”. Levy states further that 97.6% of present higher education enrolment is in systems with dual-sector provision, mostly within developed and developing regions (e.g. Asia and Latin America), and that all but a



few systems include private higher education. Levy further indicates that enrolment in private higher education has increased despite the prevalence of expanding regulations such as quality assurance, increased access to public higher education, and the notion that higher education is a “public good” with the expectation that greater state investment is necessary. Private higher education has expanded into cross-border provisioning or affiliation with public higher education institutions and in the form of for-profit enterprises. Although the private sector is considered the “second sector” alongside the public sector, it is not marginalised due to the large size of the sector (wide dispersion globally and great concentration in certain regions) and percentage of total higher education enrolment (*ibid*).

Levy (2018) states that before data was made available by the Program for Research on Private Higher Education (PROPHE), there has largely been a lack of “broad, systematic, and reliable data on PHE” with several studies remarking on the rapid growth of the sector without detailing how much and where. Levy (2018) posits that the work done by PROPHE has produced a reliable dataset spanning 2000 to 2010. The dataset spans 210 countries, with UNESCO’s Institute for Statistics as the primary source, supplemented by national and international agency sources. The dataset identifies China and India as the two largest higher education systems. Global enrolment is placed within seven regions, viz. Sub-Saharan Africa, USA, Europe, Latin America, Arab, Asia and CANZ (Canada, Australia, and New Zealand). Three of the “big ten” systems, namely the USA, China and India, account for as much as 38% of global private higher education. India appears to have the biggest private higher education sector. It was found that private higher education is “much more a developing than developed world phenomenon and Asia and Latin America are the twin regional giants of PHE” (*ibid*).

It is believed that “cash-strapped countries” look to the private sector to absorb the growing demand for higher education as these governments cannot fund the need for expansion (Buckner, 2017). The body of literature on comparative higher education indicates that North America, Latin America, and East Asia are market-oriented systems with longstanding private higher education on offer, dating back to colonial influence and religious institutions (Buckner, 2017). Kinser (in Kinser *et al.*; 2010, p.2) notes that higher education has primarily been the responsibility of the state, with public education at the apex and private higher education largely

neglected in policy and practice. However, the United States and Latin America have proven to be the exceptions, with the US having a strong and significant private higher education sector at the outset (*ibid*). By the mid-20<sup>th</sup> century, Latin America had become the first region with private higher education in nearly all countries (Salto & Levy, 2021). Latin America is viewed as the leading region in private higher education enrolment with one out of two students enrolled (*ibid*).

When considering the BRICS countries (comprising Brazil, Russia, India, China, and South Africa), rapid expansion is particularly noticeable in Brazil. Brazil has the largest higher education system in Latin America where private higher education accounts for more than 70% of student enrolment (Salto, 2018; UNESCO, 2014, p.16). Brazil expanded its private higher education sector to provide greater access to higher education (Salto, 2018). In the 1990s, Brazil permitted the establishment of for-profit, tax-paying private higher education institutions. It is indicated that Latin America's for-profit private higher education concentration is in Brazil (Salto & Levy, 2021).

It is recognised that the for-profit sector is “playing a growing role in higher education worldwide” although “we still know little about the size and scope of this sector, especially in developing countries” (Salto, 2018). The for-profit sector is viewed as a competitor to non-profit private and public higher education entities, and it was found that these entities band together on the view that profit and educational values are incompatible (*ibid*).

The for-profit component of the private sector includes “small, family-owned proprietary schools” and “large publicly traded companies that own institutions” (Salto, 2018). Tamrat (2017) indicates that many private institutions are owned by individuals, or by foreign companies and agencies in collaboration with local institutions.

Private higher education institutions are largely dependent on student fees. However, there are exceptions, such as in India where private higher education institutions are funded by the government (if there is affiliation with a public institution), and similarly in Belgium and the Netherlands (Tamrat, 2017). It is noted that the Indian government's funding of public institutions has dwindled and aid for private higher education institutions has “stagnated” in recent years. Unaided private

institutions have proliferated and been left largely unregulated (Jamkar & Johnstone, 2021).

## 2.2.2 Concerns regarding private higher education

Some scholars hold a negative view of private higher education as it is regarded as mainly a “for-profit” area (Tamrat, 2017). It is believed that the profit imperative leads to the lowering of the quality of higher education (Kajawo, 2020). Ayuk and Koma (2019) indicate that the “for-profit” motive has “diverse implications for access, quality and the cost of HE”. Private higher education has been a focus area in discussions on “quality, equity, new learning modes and, perhaps most of all, access” (Altbach *et al.*, 2009, p.111). In Ghana, a Sub-Saharan African country, private higher education emerged in the 1990s, following deregulation of the higher education sector, and since then it has “sprung up like mushrooms”, bringing with it greater accessibility but also concerns about the quality and standards at some institutions (Odjidja, 2021).

Salto (2018) indicates that private higher education institutions are “blamed” for being guided by “profit-making” as an incentive, yet these institutions would argue that this pursuit does not affect quality. In the researcher’s opinion, if paying greater dividends to shareholders translates into spending less on resources and maintenance of facilities, and/or if there is over-enrolment despite depleted resources and insufficient facilities, then quality programme delivery can be put at risk. It would depend on budgeting and if cost-effective measures are implemented these should not detract from programme quality. Programmes are expected to be offered as accredited, that is *inter alia* with the number of relevant resources, and appropriate facilities and infrastructure, as declared upon application to the CHE. If any for-profit private higher education institution, which is essentially a business enterprise, becomes sustainable and generates income that can be ploughed back into the business, it is indicative of potential longevity and growth of a product that finds appeal with its target market. Considering the for-profit private institution is a business venture, is the profit-imperative then not a given? It is common knowledge and logical that any business needs to stay afloat to cover overheads, salaries and such expenses needed to operate, and it will generate profit after reaching break-even point. The establishment of an educational institution would therefore need to

be a carefully considered strategy. The scenario where the private institution offers a “poor-quality product” (higher education programme), or a non-competitively priced product, would mean that it will not attract the clientele (“students”), thereby not generating sufficient income. The business will most likely flounder, leading to closure and possibly leaving registered students in the lurch. In the scenario where the private institution offers a good product and its reputation grows and solidifies, increased student enrolment could be a consequence from which profit will flow. Thus, the question is whether profiting from private education should be viewed negatively.

Bernasconi (2013) indicates that “profit-seeking providers” are growing in Latin America and the United States, and that the “controllers” of non-profit institutions might be involved in “under-the-table dealings”. Bernasconi states that it could be questioned whether for-profit institutions invest as they should in learning and teaching or “cutting corners to maximize earnings”. On the other hand, if they do not offer quality education, they will not make business. The “net effect” is questioned though, i.e. how much is left to reinvest in education after investors and owners have been remunerated (*ibid*).

The question is, therefore, whether management/owners/investors have a greater vested interest in profit-sharing or academics, and whether the twain can meet. It is noted that the largest private higher education provider in South Africa proclaims its ongoing commitment to education excellence while steadily increasing its profits annually ([https://irp.cdn-website.com/24847d5c/files/uploaded/2021\\_ADvTECH\\_Interim\\_Results\\_June\\_2021.pdf](https://irp.cdn-website.com/24847d5c/files/uploaded/2021_ADvTECH_Interim_Results_June_2021.pdf).) (see further discussion). Thus, it would depend on the yardstick used to qualify “excellence” and whether “quality” education means satisfying the minimum quality standards of the CHE.

The criticism levelled at private higher education institutions is that they charge exorbitant fees and enrol only those that can afford it, and that exclusion of the indigent leads to the enhancement of existing inequalities (Kajawo, 2020). Marginson (2016, pp.424-425) states that private education contributes to social stratification, citing US Ivy League universities which he deems to be “engines of social advantage”. This could be the case in India, where some unaided private higher

education institutions charge fees that are affordable only to rich and higher caste students living in certain urban areas (Jamkar & Johnstone, 2021). While private higher education strengthens its hold in India, social stratification will be reinforced if diversity is not focused on by policymakers and private institutions (*ibid*). The Indian private higher education sector is lucrative and heavily invested in by politicians, yet although it enrolls about two-thirds of higher education students and costs more, it is nonetheless regarded as mediocre “degree shops” (Pushkar, 2021).

There are other concerns about private higher education which include: 1) weaknesses in managing examinations securely which cast doubt on the integrity of the assessment process; 2) shortage of qualified staff, particularly full-time staff; 3) inadequate or under-resourced physical facilities and infrastructure for the offering of quality higher education, e.g. in Malawi and Nigeria; 4) selective, limited study programmes with low running costs, which means less diversified offerings as opposed to public institutions, e.g. in Zimbabwe where the focus in private institutions is on “business management, humanities, social sciences and theology” (Kajawo, 2020).

Tamrat (2019) indicates that private institutions display limited engagement with research. This was also found by Altbach *et al.* (2009, p.80) who indicated that private higher education is “less central to themes of knowledge development, research and planning” but that, as governments start to acknowledge its role, a more integrative approach should be taken. The question arises as to how this could be done in South Africa. It is unlikely that a slice of government subsidy would go to private higher education to fund research output, not when the fiscal budget during the first quarter of 2021/2022 shows that (public) education remains the largest item of expenditure on provincial budgets with 9% higher spending than the previous year (National Treasury Media Statement, 24 August 2021); government expenditure on total education has exceeded that of BRICS coalition countries, as well as the average for OECD countries; post-COVID recovery plans would see government coffers further strained; and despite recognition of the important role played by private higher education, it is marginalised<sup>19</sup> in the DHET’s reporting and planning,

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<sup>19</sup> A PHE association participant indicated that “the Higher Education Act also is so geared for public higher education. There’s really very little that it says about private higher education and how it should be, what the

(cf. <https://www.oecd.org/coronavirus/policy-responses/the-impact-of-the-coronavirus-covid-19-crisis-on-development-finance-9de00b3b/> ; RSA, 15 October 2020; UNICEF, December 2020; UNDP, 17 June 2021; DHET, 2021b; DHET, 2020; RSA, 2013).

It is noted that certain private higher education institutions in South Africa have research projects or centres driving internal research capacity building. In the case of the largest private higher education provider, the research initiatives include partnering with local, regional, and international partners (<https://www.iie.ac.za/partnerships-and-centres-of-the-iie>). The institution also publishes the *Independent Journal of Teaching and Learning* which is on the DHET's "List of Approved South African Journals" (January 2021). Not only are these large private providers involved in research but also community engagement. For instance, the community engagement embarked on by the second-largest private higher education provider in South Africa includes the development of two schools in the Western Cape which will entail the "incorporation of sustainable and natural building technologies" (<https://studio.ac.za/community-engagement>), thus intended benefits for the community and environment.

### **2.2.3 Benefits of private higher education**

Kajawo (2020) indicates that the benefits of private higher education include: 1) assurance of an uninterrupted academic year versus their public counterparts that might experience disruption due to strikes or other disturbances; 2) the creation of more jobs for academic and non-academic staff; 3) agility in terms of change in the sector due to a more flexible or less bureaucratic management structure; 4) provision of higher education at no or minimal public cost; 5) offers a solution to the dilemma of widening access to students without (significant) increase in public expenditure; 6) providing opportunities for students who did not meet public university entry requirements or could not gain access due to stiff competition for the limited number of available places; 7) providing relevant quality higher education. Nukunah, Bezuidenhout and Furtak (2019) indicate that, in South Africa, private higher education institutions act as a "conduit to meet skills shortages in the workplace".

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standards are, and rules are. Private higher education is governed more or less through regulations and practice".

Private higher education is said to be innovative in the use of learning and teaching technologies (Altbach *et al.*, 2009, p.14). The latter is evident in the largest private provider in South Africa that recently proclaimed the opening of its “state-of-the-art campus” (cf. <https://www.advtech.co.za/leading-private-tertiary-brand-announces-a-new-state-of-the-art-campus>; accessed 28 September 2021). It is also evident in the second largest private higher education provider which has constructed its “iconic campus” due to open in 2022 at a cost of more than R200 million (<https://stadio.ac.za/studios-iconic-centurion-campus-symbol-hope>; accessed 28 September 2021). The campus boasts “world-class facilities and a modern environment” (*sic*).

It seems there are opposing views held on private higher education – it is either elitist and excellent or caters for the masses and is of poor quality. Marginson (2016, pp.424-425) indicates that the “private sector is positioned differently outside the US” in that it caters for the masses and that the mass private sector carries “problems of low and variable quality, especially for-profit colleges”. For example, in Brazil, many students enrol at private higher education institutions that are self-funded and often of inferior quality (Ayuk & Koma, 2019). In Nigeria, the converse is true since the lack of quality provision in fee-free public higher education is one of the reasons for the increase in private higher education institutions which provide a better-quality education and is better resourced (Ayuk & Koma, 2019). The private sector cannot, therefore, be brushed by general statements. The largest private provider<sup>20</sup> in South Africa is also a case in point. If one considers its track record of continued compliance (as per the list of registered programmes in the DHET’s periodic *Register*), it is safe to assume that the claim of “quality education” is not a marketing gimmick and that students are not being misled.

#### **2.2.4 Oversight of private higher education**

The DHET (2021c) indicates that regular monitoring and continued oversight of the sector is required to ensure compliance. Tamrat (2019) posits that an initial laissez-faire approach or “delayed regulation” to the advent of private higher education can

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<sup>20</sup> The holding company’s “Interim Results” (June 2021) proclaim a commitment to “academic excellence” and “continued delivery of quality education” ([https://irp.cdn-website.com/24847d5c/files/uploaded/2021\\_ADVTECH\\_Interim\\_Results\\_June\\_2021.pdf](https://irp.cdn-website.com/24847d5c/files/uploaded/2021_ADVTECH_Interim_Results_June_2021.pdf); <https://www.advtech.co.za/financial-results>).



promote its growth but could also lead to doubt about quality and sustainability if left unregulated. It is argued that the government's moulding of this sector through its regulatory framework should not be "too lax or too stringent since these two extremes can result in lawlessness or strangling of the private sector or anywhere in between". It is indicated that government policy can affect the management and operations of an institution (*ibid*). Research indicates the positive relationship between government policy and private sector growth which signifies how legislation and policy can shape the scope and nature of private provision (*sic*). For instance, the case of Tunisia and Morocco in North Africa.

Private higher education in Morocco and Tunisia came into being in the 1980s and the institutions were predominantly vocational. Tunisia has a large number of smaller higher education institutions that are viewed as a "last resort" whereas Morocco has a small number that targets the elite (Buckner, 2018). The Moroccan government has introduced strict regulations for private institutions in a bid to attract Moroccans living abroad. Morocco is considered to be different in that private higher education does not cater for the masses (Buckner, 2018).

In Tunisia, the government implemented a law in 2001 which was to lay the foundation for private higher education success. The law set down standards for admission, faculty qualifications, student-faculty ratio, and equivalence with public higher education so that transition to public education or the workplace could be possible. However, there is low demand and the impression of varying quality. Private higher education is viewed as an investment opportunity, a business rather than an academic enterprise. Private institutions cater for students who have failed at public institutions, offer highly specialised programmes, or cater for international students. Public education is free and considered of high quality, leaving private higher education on the outskirts of the Tunisian education system because, although touted by the government in documentation, it does not receive support in real terms (*ibid*).

Hunt and Boliver (2019) did a study on private higher education in the United Kingdom to provide insight into the shape and size of the sector, which was not funded by the government and, although in existence for decades, had largely been undocumented and unregulated. It was found that, in 2017, there were 813 private



higher education institutions in the United Kingdom, with approximately 115 receiving support in the form of tuition fee loans, five held the title of “university” and four are called “university college”. Sixty-five per cent of institutions were registered as for-profit providers. For-profit institutions were under 20 years old and non-profit providers were around for longer than 20 years. It was also found that 23 per cent of 732 providers that had started in 2014 ceased to exist in 2017 – 90 per cent of these were for-profit institutions thus making the for-profit sector the largest number of “failed providers”. Recently, the government has sought to foster the growth of the private higher education sector because it is seen as responsive to skills needs, has flexible means of provisioning, and is well placed to meet international demand for UK higher education (*ibid*).

Typically, private higher education is not funded by the government, neither for its establishment nor growth/expansion (Buckner, 2017) as is the case in South Africa. The following section will provide an overview of the current state of private higher education in South Africa.

## **2.3 THE CURRENT STATE OF PRIVATE HIGHER EDUCATION IN SOUTH AFRICA**

### **2.3.1 A diverse private higher education sector**

The current DHET *Register* (13 September 2021) lists 93 registered private higher education institutions and 40 that are provisionally registered – thus a total of 133 institutions that are permitted to operate. The *Register* of 2 August 2021 listed 93 registered private higher education institutions (with more than 850 higher education programmes on offer), and 36 that are provisionally registered – thus, a total of 129 institutions that were permitted to operate. It further listed seven institutions for which registration had been cancelled (and an appeal may be lodged), 93 for which the cancellation of registration had come into effect (thus deregistered), and ten that requested the Registrar to discontinue their registration. The *Register* of 17 May 2021 listed 96 registered and 35 provisionally registered institutions (a total of 131 permitted to operate); 27 cancelled registrations (with opportunity for appeal); 70 deregistered; and 10 requested deregistration. The *Register* of 12 March 2021 listed 95 registered plus 35 provisionally registered providers for a total of 130 operators. In the space of seven months (March to September), the number of legal operators

has changed which is evident of a sector in constant flux. This begs the question of whether, regardless of the providers that remain and prove to be compliant and sustainable, this uncertainty and unpredictability can instil confidence in the private sector. More importantly, it should be considered how stability can be achieved: Should there be a greater level of screening for those who wish to enter the sector; should the regulations for registration be reviewed; should the DHET be a tougher gatekeeper to the system and would this, together with greater collaboration between the DHET and CHE to block the “fly-by-nights”, lead to quality higher education?

The reasons for the cancellation of seven institutions are several. The institution either i) no longer offers programmes that are aligned to the HEQSF; ii) ceased to provide higher education as contemplated in the Act (cf. Higher Education Act); iii) failed to comply with the quality assurance requirements of the Higher Education Quality Committee (HEQC) of the CHE; or iv) ceased to exist as a separate independent higher education provider (and has been absorbed into another private higher education institution). Of the 93 for which cancellation of registration came into effect in August 2021, four are currently operating as sites of delivery for a registered institution, which means that all four have been absorbed into another entity (DHET, 2 August 2021, pp.135-149). This links with Levy (2018) who indicates that “PHE not only survives and grows but also continues to spawn fresh forms”. Thus, continuous change in the sector globally, and also locally.

In the case where cancelled institutions have been absorbed into a registered entity, one registered entity currently offers 52 programmes across nine sites of delivery (campuses) and the other has 132 programmes across 27 sites. These two registered institutions are the largest private higher education providers listed in the *Register* (DHET, 13 September 2021) and are showing steady growth, diversity of programme offerings across multiple campuses, as well as research and community engagement initiatives (see discussion in previous and following sections). The largest provider is as large, if not larger, than some public universities. Contrast these providers with one that offers between one to three programmes<sup>21</sup> and the diversity is evident.

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<sup>21</sup> For example: DHET, 13 September 2021, pp.11-12, 15, 17-18, 22, 23-24, 26-27

The disparity between institutions is magnified if the information on the website of the largest registered private provider in South Africa is considered: It operates with five “brands” and also has international accreditation (accessed 27 September 2021). A Google search further indicates that it is wholly owned by a holding company that is listed on the Johannesburg Stock Exchange (JSE) and operates across three divisions, including a tertiary and school division. The holding company’s “Results for the year ended 31 Dec 2015” (accessed via Google on 27 September 2021) reflects tertiary enrolment of 24 332 students (21 per cent increase from 2014) and intragroup revenue of R2.7 billion, with operating profit at R448 million. The company’s “Interim Results” as at 30 June 2021 indicate 44 975 student enrolment in February 2021 and R280 million operating profit in the tertiary division<sup>22</sup>.

The second-largest private provider is also part of a holding company that has two other private higher education subsidiaries, which are both well-known brands that have been in the sector for a few decades or more<sup>23</sup>. A Google search (on 27 September 2021) of the holding company found that, collectively, the three entities offer over 90 accredited programmes to more than 30 000 students (as proclaimed on the holding company website). The holding company is listed on the JSE. The DHET *Register* (2 August 2021) indicates that the second-largest provider has over 50 programmes, and the two subsidiaries offer 12 and 21 programmes, respectively, thus nearly 90 programmes are currently registered for the three. The website of the second-largest provider reflects that it consists of four former registered private higher education institutions of which the programmes have seemingly been amalgamated and are currently offered under five faculties. Some programmes across two of the five faculties are also offered in a neighbouring country. The holding company envisions 56 000 students enrolled by 2026 (IOL, 12 July 2020). The group plans on developing multi-faculty campuses that “could accommodate between 3 000 and 5 000 students in strategic locations” (IOL, 12 July 2020). It appears that growth in the private higher education sector in South Africa is imminent, at least in terms of increasing enrolment and expanding provision in the case of “big players” in the sector. Despite the effects of COVID, the two largest

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<sup>22</sup> ([https://irp.cdn-website.com/24847d5c/files/uploaded/2021\\_ADvTECH\\_Interim\\_Results\\_June\\_2021.pdf](https://irp.cdn-website.com/24847d5c/files/uploaded/2021_ADvTECH_Interim_Results_June_2021.pdf))

<sup>23</sup> (<https://www.milpark.ac.za/about-milpark-education>; <https://afda.co.za/about/why-afda/>; accessed 3 October 2021)

private providers in the country show financial results that “suggest the ‘private university’ concept is rapidly gaining traction among South Africans” (Business Live, 10 September 2020).

The third-largest private provider in the DHET *Register* (13 September 2021) offers 51 distance learning programmes up to the Master and Doctorate level. Its website proclaims current enrolment above 10 000 students, and that it has accreditation in Zambia and Malawi and is a member of Honoris United Universities<sup>24</sup>.

Considering that the largest private higher education provider, for example, is offering qualifications comparable to those of public institutions<sup>25</sup> (as determined by the fact that its accredited programmes are measured against the same quality criteria of the CHE), is as large or even larger than some public institutions in the country, is involved in research and community engagement, and seemingly provides quality learning and teaching (evidenced by longevity and consumer demand), the question that arises is why it cannot be deemed a “university” despite the apparent similar characteristics. The next consideration is whether, by advancing on all fronts and holding its own in terms of quality provisioning, it is positioning itself to be called a “university” and what this would mean for the South African higher education sector if the Minister were to be petitioned to declare it as such<sup>26</sup>. A question to be considered is whether being called a “university” would lend credence to a private higher education institution and whether this would even be necessary when many of them are working hard at accruing reputable credentials and affiliations/networks<sup>27</sup>.

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<sup>24</sup> (<https://www.mancosa.co.za/about-us/brief-history/>; accessed 3 October 2021)

<sup>25</sup> As per Section 53(1)(b)(i) of the Higher Education Act, a private higher education institution may not offer higher education programmes that are “inferior to standards at a comparable public higher education institution” (RSA, 1997).

<sup>26</sup> According to Section 54(7) of the Higher Education Act (as amended under Act 54 of 2000), no private higher education institution may call itself a “university” (RSA, 1997).

<sup>27</sup> What makes a university a “university” is also what should be pondered. The CHE (February 2020) revisited the concept of “university” and found that it constitutes the generation, diffusion, extension and advancement of knowledge. Learning and teaching, research, and community engagement are the core functions of a university (CHE, February 2020). A private institution – to be considered a university – should therefore be evaluated to determine how close it is to realisation of these endeavours. It should be noted that several public universities do not take their “third mission”, i.e. community engagement, as seriously which raises the question again as to why there is the divide between private and public on being a “university” if a public entity nonetheless falls short in a particular area (that is, if having a “failing” in one area is cause for distinction). Unless, of course, it is a matter of (perceived) quality, but even this argument would falter because the programmes offered by private institutions are subject to the same criteria for accreditation and

The following statement on the website of the largest private provider indicates<sup>28</sup>:

*“Private higher education providers ... are owned by private organisations or individuals. Although many of them offer the same qualifications as public providers, private provider institutions are mostly privately funded (through student fees) and are not subsidised by the state. The qualifications of both public and private higher education institutions must be accredited by the HEQC and registered on the NQF. The (Institution) is essentially a private University with the same status afforded to our qualifications by the Council for Higher Education and thus on equal footing internationally. However, in South Africa, until recently, no private institution could call itself a University. That technically changed recently, but the Minister of Higher Education has not yet set out the criteria for the classification of Universities under the amended Higher Education Act, which will apply to both public and privates. **Private Universities in other countries have become a model for excellence in Tertiary Education** (e.g. Harvard, Stanford etc.).”*

**(Researcher’s emphasis)**

Although not entitled to call itself a “university”, it appears there is an anticipation of the status associated with being a “university”<sup>29</sup>.

The largest private provider, together with the second- and third-largest, and other large private higher education providers, are affiliated to a private higher education association (<https://www.saphe.ac.za/>)<sup>30</sup>. The South African Private Higher Education (SAPHE) consists of 15 members, among these the biggest private providers in terms of several programme offerings and sites (and student enrolment – cf. discussion above on the two largest private providers). If the collective strengths, capabilities, and resources of these institutions were to be harnessed, the potential of these private institutions to become an indomitable force (of private universities, if so declared), particularly an allied force, could herald the beginning of a new era in the higher education sector. The effect on the higher education sector as a whole, and the public sector, in particular, could prove to be fortuitous if the

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under continuous scrutiny by the CHE in having to participate in the cyclical programme reaccreditation process.

<sup>28</sup> (cf. <https://varsitycollege.freshdesk.com/support/solutions/articles/48000970272-why-are-we-not-called-a-university->)

<sup>29</sup> It is noted that the Higher Education Act has undergone ten amendments since 1997 and that the latest amendment, i.e. Act 9 of 2017 (Legislation and Policy Register; DHET, 21 January 2020), indicates that Section 54(7)(b) of the principal Act has been amended as follows: “... unless it is registered in the particular category of institutions which, in accordance with the Regulations, may call themselves universities, university colleges or higher education colleges”. However, the amendment has not yet been implemented.

<sup>30</sup> There are two private higher education associations to which affiliation is voluntary (cf. <https://www.appetd.org.za/>; <https://www.saphe.ac.za/>).

government is lax in its efforts to set forth a more inclusive strategy. This gives pause for thought as to when the government will more actively foster growth in the private higher education sector, or whether the opportunity has been missed. If one considers associations in the higher education sector globally, such as the European Universities Association (EUA, 2010; EUA 2020), there is potential in private higher education to shape the South African higher education sector positively (e.g. in terms of absorbing higher education demand, possibly producing more graduates, and filling skills gaps in the workplace<sup>31</sup>), or perhaps further away from government control if an inclusive strategy is not adopted.

With a victory through judgement passed by the High Court in Pietermaritzburg in 2019 in favour of the largest private provider (Regchand, 2019), the private higher education sector is systematically asserting itself. The Judge ruled that “students that graduate with an LLB degree offered by Varsity College after January 1, 2018 ‘are as qualified to enter the practice of the legal profession as the graduates from public universities in SA” (*ibid*). A precedent has been set and it is evident that (for-profit) private higher education in South Africa is not accepting the status of “second sector” as per Levy (2018; see earlier discussion) and that certain programmes are certainly not inferior as discovered in Brazil, (cf. Ayuk and Koma, 2019), or in other parts of the world (cf. Marginson, 2016).

In the White Paper on PSET (RSA, 2013, p.42), the DHET recognises that “data on post-school private institutions is often inaccurate, incomplete, and scattered among various data sets in various institutions”. Therefore, the data first needs to be verified for the DHET to make an informed decision on its approach to private higher education. The DHET (RSA, 2013, p.43) acknowledges that only reliable, credible data – and analysis thereof – could inform its understanding of the role and contribution of the private sector and whether a uniform policy would be required to govern the sector. The DHET (in the White Paper on PSET; RSA, 2013, p.43) committed to a “thorough review of the regulation and quality assurance of private providers” to ensure that the Quality Council and SAQA make optimal use of available resources to fulfil their mandates. The need for such a review is evident as the private higher education sector continues to morph into a more forceful presence

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<sup>31</sup> (Deloitte, July 2021); (Nukunah, CNT, Bezuidenhout, A & Furtak, A, 2019)



with several household names/recognisable brands having demonstrated staying power in the sector (although they might have undergone change management over the years) (DHET, 13 September 2021; <https://damelin.co.za/>; <https://lyceum.co.za/>).

The *Statistics on Post-School Education and Training in South Africa: 2019* (DHET, 2021) indicates the total enrolment in private higher education as 208 978 in 2019, which is a 5.6% increase since 2018 and more than double enrolment over the nine years. There is no doubt that with exponential growth in the private higher education sector it is developing into a force to be reckoned with. The number of private higher education providers totalled 131 in 2019, which does not mean these are the same 131 still registered today. This is a sector in constant flux which had a grasp on 16.6% of 1 256 890 total enrolments in higher education in 2019. With COVID-19 restrictions creating a move to distance online learning, the percentage enrolment could have gone up if the second-largest provider's claim of 11% increase in enrolment is considered<sup>32</sup>.

The 2019 statistics reflect audited data extracted from the annual reports submitted by private higher education institutions since 2016, therefore, this is verifiable data and a reliable indicator of the current state of the private higher education sector. Alongside data that has to be produced by the CHE and monitoring of the PSET (DHET, 2021b), the DHET is seemingly in a position now (since the release of the White Paper on PSET in 2013) to make strategic decisions regarding private higher education. Data acquired through quality assurance processes “provide policy-makers with detailed information about system and institutional performance” (UNESCO, 2017).<sup>33</sup> The accreditation and reaccreditation data (as well as institutional audit data) of the CHE would serve this purpose.

Besides local accreditation of higher education offerings, several private institutions have international accreditation (cf. for example <https://www.iie.ac.za/quality-assurance-accreditation>). They also have a transnational presence (cross-border provisioning of programmes) (cf. for example <https://stadio.ac.za/windhoek-namibia>)

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<sup>32</sup> (cf. <https://www.news24.com/fin24/companies/from-a-distance-online-and-off-site-learning-see-stadio-grow-its-student-numbers-20210831>; accessed 3 October 2021)

<sup>33</sup> “Results can be used, for example, to justify changes to funding and program creation or consolidation. They should also provide students and parents with data on graduation rates, financial aid and even post-graduate employment to help them choose”. (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2017)

which means they need to comply with the HEQC's requirements for accreditation (CHE, 2004b, as amended) as well as "satisfy the relevant quality assurance policies and procedures of the countries in which they operate" (CHE, 2004a). Three institutions are affiliated to the first Pan-African private higher education network, which comprises 14 member institutions that have the common purpose of "creating pan-regional profile graduates with cross-border academic and work experience to be competitive in today's fast-paced and demanding labor markets"

(<https://honoris.net/>; <https://honoris.net/history/a-shared-vision/>). Private providers are evidently seeking a global footprint and recognition, or at least regional.

### **2.3.2 An evolving private higher education sector**

Present-day private higher education institutions are brand conscious and actively seek to promote and protect their brand (cf. <https://honoris.net/mancosa-offers-forgery-proof-blockchain-certificates/>). However, some business entities might have been absorbed into "renowned public or privately owned enterprises" (Stander & Herman, 2017). This could have an impact on the delivery of a programme that was accredited for a specific site of delivery with dedicated staff, infrastructure, and resources. In the transitional period during a company merger or takeover, it is not clear who accepts responsibility for quality assuring the programme.

Webbstock (in CHE, 2016) indicates that, by 2015, the institutional landscape had undergone restructuring with the advent of new institutions through mergers, which included both public and private institutions. In the case of the latter, company takeover has continued and led to different facets or characteristics of merged institutions and possibly intricate governance and management structures. For example, certain private higher education institutions have been absorbed into foreign holding companies, e.g. the acquisition of a private provider of hospitality programmes by the Swiss company Sommet Education (<https://www.bizcommunity.com/Article/196/499/215122.html>). The question is to what extent foreign investment benefits the company and also to what extent the profit imperative impacts on quality programme delivery.



This study finds that several institutions have been acquired and subsumed into what is usually a bigger brand<sup>34</sup> or holding company<sup>35</sup>. This could mean the former brands cease to exist and only one brand is identifiable as a registered entity. In some instances, the acquisition could include brand retention, thus separate registered entities<sup>36</sup> under a holding company. In the case of the latter, the distinction between holding company and registered institution is not always clear as there appears to be a sharing of resources or staff<sup>37</sup>. For example, an unregistered higher education provider (the “parent” company) seems to have acquired two institutions that are listed as independent registered entities (DHET, 2 August 2021). However, the one registered entity is regarded as a “school” of the parent company and seems to share sites of delivery (and perhaps also resources or staffing) with its “family of educational brands” (cf. <https://www.aie.ac/>; <https://designcenter.co.za/>; <https://www.conceptinteractive.co.za/>; accessed 28 September 2021). The question that arises is who takes responsibility for the quality assurance of higher education programmes in a seemingly intertwined governance and management structure. This could be challenging for the CHE when determining who takes ownership of the programme in terms of design, delivery, and improvement (CHE, 2004b). This leads one to ponder about brand identification: i) whether the meshing of brands is beneficial or detrimental to attracting the target customer market; ii) whether there is continued confidence in a brand that was once distinct and has now merged with another; and iii) whether the rebranded programme retains its quality. The issue of branding is essentially linked to the longevity of an institution, which depends on the perception of a “quality” brand and building a solid reputation over time.

Another development in the private sector is where a merger leads to the name change of an institution, perhaps more than once (DHET, 2 August 2021, p.39). For example, a private higher education institution was merged with another following acquisition by an international company, thus a name change occurred. Thereafter, it was acquired by a Pan-African investment firm in collaboration with a (not-yet-registered) local private provider which led to another name change

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<sup>34</sup> (cf. <https://www.iie.ac.za/our-brands>; <https://mg.co.za/article/2019-05-22-private-sector-wants-to-play-a-bigger-role-in-higher-education/>)

<sup>35</sup> (cf. a registered private college that offers further education and training qualifications, <https://www.aie.ac/>)

<sup>36</sup> (cf. <https://educor.co.za/>)

<sup>37</sup> (cf. “sister” brands in DHET, 2 August 2021; pp.28, 33, 49-50, 72)

(<https://www.avca-africa.org/newsroom/member-news/2020/exeo-capital-acquires-pearson-institute-of-higher-education/>; accessed 28 September 2021). The name change is essentially a difference in the brand.

The brand is how the customer identifies a business and comes to know what to expect from it. The company brand sets it apart from the competition and clarifies what makes one a better choice than the other. If it is a well-known and trusted brand, it creates a sense of familiarity, reliability, and reassurance. Brand awareness is essential for the growth of a business as it generates referrals

(<https://www.thebrandingjournal.com/2016/06/why-is-branding-important-business/>; accessed 28 September 2021). The idea of an education “brand” creates competition in the sector, based on the assumption that the “brand” guarantees “quality” (Harvey & Green, 1993). Stensaker (2018) indicates that “private accreditation schemes are more related to the acquirement of status and later usage in institutional profiling, marketing, and branding exercises”. Accruing accreditation credentials regionally or internationally adds to the credibility, “legitimacy” and awareness of a “compliant brand”. It is the researcher’s opinion that, once the playing field is levelled in terms of classifying a private provider as a “university”, the pecking order in the higher education sector will emerge.

Brands change as institutions merge, or brands cease as institutions become “sites of delivery” of a bigger entity (DHET, 2 August 2021, pp.147 & 149). If institutions close down due to mergers, the well-being of the student and staff, safekeeping of student academic records and certification of students should be a priority. The DHET has teach-out measures in place that are aimed at protecting the interest of students, particularly those in the pipeline (DHET, 2 August 2021, pp. 139-140 & 144). Stander and Herman (2017) found that each private higher education institution in South Africa has its “own set of infrastructure, resources and support structures”. It should, however, be confirmed whether being part of a larger operation translates into being ‘better off’, that is having better/more resourcing, or whether constraints apply if the profit imperative outweighs the academic concern.

Stander and Herman (2017) point to the disparity between private higher education institutions that offer programmes in the same Classification of Educational Subject Matter (CESM) category (DHET, 2008, as amended 2014) where one might have

adequately qualified academic staff, sufficient support staff and resources, adequate and appropriate infrastructure, library, and IT facilities, while another might be deficient in the same areas. This could inspire a lack of confidence in the credibility of programmes offered by some private higher education institutions. Stander and Herman (2017) indicate that most private providers are “self-funded” and “therefore have limited resources available”. It would be of interest to note whether limited resources influence the composition of quality management structures.

As previously indicated, there is a wide variety and a large number of programme offerings in the private higher education sector (many of which are similar). Thus lower enrolment in the private sector (compared to public enrolment<sup>38</sup>) could be the catalyst for fierce competition. Tamrat (2017) points out that the private higher education sector is a competitive environment. It could be argued that private higher education institutions are “customer-oriented” (Dittrich & Weck-Hannemann, 2010) or that they are “more efficient and effective” than public higher education institutions (Tamrat (2017). This study will not, however, explore the comparison between private and public institutions but will focus on whether compliance with regulatory requirements is achieved and, if so, which quality management practices enable compliance, sustainability, and improvement.

## **2.4 TRENDS IN PRIVATE HIGHER EDUCATION**

The preceding discussion highlights the evolving nature of the private higher education sector. In this section, an overview of the current trends in the private higher education sector will be provided.

In terms of government support for the private higher education sector and concerning the issue of higher education funding, it is found that “self-governing” universities in the United Kingdom, previously “public” and now legally classified as “private”, are still shaped by “government policy, regulation and funding” (Marginson, 2017). In the last decade, the UK government encouraged private sector development. There were ten new “university” designations declared and subsidisation of private higher education (in the form of capped fee student tuition loans). Despite these initiatives by the government, private higher education

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<sup>38</sup> Over 1.2 million students enrolled in private and public HEIs in 2018, with the majority in public HEIs (1 085 568) while 197 898 students enrolled at private HEIs. (RSA, 2018)

institutions were not eligible for research grants and there are still no full statistics available on these “alternative providers” (*ibid*), which serves to marginalise them. Government support in the UK seems to be in fits and starts.

The number of private providers in the UK expanded since 2012 but they remained small (Marginson, 2017). Shah *et al.* (2019) outline the following developments worldwide in the last few years: i) significant growth in private higher education in Asia, Africa (e.g. Uganda with 26 private universities compared to five public) and South America; ii) rapid growth in countries such as Italy, China, the UK and India; iii) rapid expansion of private higher education in low- and middle-income countries; iv) one in three students enrolled in private higher education globally and hardly any decline in the private share of enrolment over nearly two decades. Besides reasons for the growth and expansion of private higher education already discussed in this chapter, the authors (*ibid*) indicate that private higher education has also grown due to supportive government policies, funding, and regulations, such as the case in Australia where growth has been enabled to attract international students. The policy has also been implemented to increase local student participation in degree or “sub-degree” programmes through funding. Shah *et al.* (2019) point out that research done by Levy and others have noted a decline in private higher education in several countries including Poland, Portugal, Romania, Ukraine and the Republic of Korea from 2003 to 2012. The primary reasons are attributed to social factors and public sector policies. However, despite the decline, growth in the private higher education sector appears to be the trend (*ibid*). This study finds evidence of the latter in the literature.

As in South Africa, there is limited research on private higher education in Australia (Shah *et al.*, 2019). Similarly to the South African context, few studies have been conducted to determine: i) factors that influence choosing to study in private higher education (or even the choice of provider, for that matter); ii) growth; iii) and student experience in the sector. In 2011, Australia had 170 private higher education institutions with 47 that ceased to operate by early 2018, in scenarios similar to South Africa, i.e.: i) deregistration by the Tertiary Education Quality and Standards Agency (TEQSA); ii) self-closure by a few entities; and iii) acquisition of smaller providers by larger ones (*ibid*). As in the case of South Africa, increased application

is received from private vocational colleges (see discussion on South African FET colleges) that wish to enter higher education.

In South Africa, the transition from one sector to another is presumably not seamless in terms of quality assurance as each sector is governed by its own Quality Council (as per the NQF Act of 2008) and the requirements for accreditation are different. If there is an upswing in this trend, concerns about quality could escalate, particularly with regard to institutions that operate in more than one sector, or higher education providers merging with FET providers, and end up sharing staff, facilities, and/or other resources. Although it is implicit in the CHE's criteria for accreditation that the higher education institution is the owner of the programme, and thus takes full responsibility for its design, delivery, and improvement (and therewith provision of all the necessary resources to support this), the intertwining of institutions under a holding company or "trans-sectoring" of institutions, presents a challenge to quality assurance in its current form. This should be considered in the way forward on the new QAF and policy (and/or guidelines) should be formulated or revised either by the DHET or the CHE, or both since each has its own set of requirements. At present, Section 27(2B) of the DHET's *Regulations for the Registration of Private Higher Education Institutions* (2016) requires the following:

*"certified copies of all partnership agreements entered into providing that;*  
*(a) the agreement is only between registered private higher education institutions or between a registered private higher education institution and a public higher education institution<sup>39</sup>;*  
*(b) the agreement relates to the provision of academic or administrative services or the sharing of staff or facilities..."*

From a quality assurance perspective, the sharing of staff could be problematic if the same staff in a conjoined FET-HE institution, that offers a programme within business management in both sectors perhaps, are assigned to modules at successive NQF levels; or staff work on a part-time basis across brands of a holding

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<sup>39</sup> Note a PHE association participant view about partnerships between public and private institutions: "DHET is on record with some very broad blanket statements, particularly around the quality in private higher education, and quite negative statements. You also see that repeated in the 2013 White Paper. Those kinds of statements don't engender a feeling of trust amongst the universities to say, 'I'd like to partner', so the partnerships are built on individuals like, for instance, who we know. But broadly I do believe that public higher and private can leverage off each other. We bring so many different things to the party. We can support, but we've got to get rid of the perception."

company. This could have an impact on staff teaching workload and detract from a research focus. Staff overload might not satisfy the requirement under accreditation criterion 3 (CHE, 2004b, as amended) for an “appropriate full-time to part-time staff ratio to ensure working conditions conducive to teaching and learning and research”. However, the word “appropriate” is open to interpretation, not only in terms of number but also the staffing model. For example, there could be one full-time staff member to four part-time and, if the institution could argue that it is “appropriate” in terms of academic leadership in the programme, the CHE would be hard-pressed not to deem it a suitable arrangement for a quality programme delivery. The sharing of facilities could be across sites, impacting access for students or availability in terms of timetabling; it could also impact site capacity in terms of the number of venues, computers, and such if the FET-HE student cohorts are enrolled on one site without proper distinction between the two. This would not satisfy the requirements of accreditation criteria 7- 8<sup>40</sup>, for example. Therefore, if the requirements of the regulatory authorities are not in sync, the private sector will continue to evolve in its own way and ensuring and assuring quality could become more challenging for the CHE. According to the CHE’s *Size and Shape of Higher Education Task Team Report* (2000, p.14):

*“... 'quality' and 'standards' are not timeless and invariant. It is unwise and inappropriate to conceive of quality as being attached to a single, a-historical and therefore universal model of a higher education institution. Quality and standards are historically specific and must be related to the objectives of higher education institutions and to educational and broader social purposes. A differentiated system in which institutions have different objectives and which caters for different social and educational purposes will necessarily have a variety of standards requirements that are appropriate to specified objectives and purposes.”*

Therefore, as private higher education institutions evolve, the external quality assurance thereof and their internal quality management practices would need to be re-evaluated to determine whether change is commensurate.

A trend in the South African private higher education sector is the acquisition of registered entities (see the previous discussion). It seems that foreign investors regard the African continent as a lucrative education market and predict that growth

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<sup>40</sup> Criterion 7 relates to infrastructure and library resources; Criterion 8 relates to programme administrative services



prospects for private higher education in Africa will continue to expand (<https://www.avca-africa.org/newsroom/member-news/2020/exeo-capital-acquires-pearson-institute-of-higher-education/>; accessed 28 September 2021). Thus it is safe to assume that greater foreign investment is on the horizon. It is also safe to assume that more registered institutions (smaller or perhaps floundering institutions post-COVID) will be absorbed into foreign holding companies. The dichotomy of subscribing to local legislation and policy yet being beholden to foreign company policy could presumably affect brand identity, institutional operations, governance and management.

It is also the case that registered private FET colleges are acquiring private higher education institutions to extend their offerings into the higher education sector (cf. <https://www.aie.ac/>; *The List of Registered Private Colleges*; DHET, 9 September 2021, p.5). It is anticipated that this will continue as more private colleges seek to move to the higher education sector following restrictions on the offering of non-HEQSF aligned NQF level 5 and 6 qualifications (former Certificates and National Diplomas) following the Minister of Higher Education and Training's stipulation that all non-HEQSF aligned qualifications could no longer be offered (DHET, 6 July 2016). It should be investigated how well these FET-cum-HE institutions adapt to the quality assurance regime of the CHE which is essentially different to that of the other two Quality Councils<sup>41</sup>.

Stander and Herman (2017) indicate that the CHE's quality assurance process is regarded as "complex". In the White Paper on PSET, the DHET recognises the "complexity" of the registration and quality assurance processes (2013, p.43) and has committed to developing a "simple and efficient registration, monitoring and regulatory system for dealing with private providers" and "a plan to expand and improve capacity for quality assurance for private providers, including making arrangements for ensuring that the necessary resources are available". The latter promise is vague and how this will become a reality under the constraints imposed by the COVID pandemic remains to be seen. The plan for capacity-building is imminent under the new QAF of the CHE (2021).

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<sup>41</sup> <https://www.umalusi.org.za/services/accreditation/>; <https://www.qcto.org.za/>

The *Post-School Education and Training Monitor* (DHET, 2021, p.13) indicates that more school-leavers have the required qualifications to enter PSET, therefore, the demand for post-school education is expected to increase in the coming years. The *PSET Monitor* (p.21) indicates that “the size and composition of enrolments in the system are envisaged to be transformed by 2030” to 12.5% share of enrolment by private “universities” (note use of terminology, although it is stated as a footnote on p.41 of the *PSET Monitor* that the legal term is “private higher education institutions”). The predicted percentage share of enrolment appears to be conservative considering the potential for growth in the private higher education sector. The *PSET Monitor* (p.55) indicates that private providers enrolled more foreign students, in relation to total enrolment, than public institutions. There could be an upward trend in this over the coming years if a preference for distance provisioning persists post-COVID and transnational and international links increase. The issue of transnational and international links should be considered by the CHE in its planning towards the implementation of the QAF (2021).

The COVID pandemic has had a significant impact on higher education. Tamrat and Teferra (2020) predict that smaller private institutions in Africa will close down as a result of the COVID-19 pandemic as they are dependent on tuition fees and receive little or no support from the government. It is assumed that company mergers and acquisitions will continue as businesses seek to expand. It is also assumed that it is a more cost-effective and time-saving measure to acquire an existing institution that has accredited programmes than to submit new applications through the CHE’s accreditation process.

The *Indicators of Higher Education Equity in the United States – 45 Year Trend Report* (The Pell Institute & PennAHEAD, 2015) indicates that the private for-profit sector in the US has grown considerably. From 2012 to 2013, there were 1 451 providers compared to 791 from 2002 to 2003. The Report further indicates the following trend in enrolment:

*“While public institutions maintained their share of undergraduate enrollment, the share of undergraduates enrolled in private non-profit institutions fell from 23 percent of the total in 1970 to 15 percent of the total in 2012. Over the same period, the share of undergraduates enrolled in private for-profit institutions grew from less than 1 percent of the total in 1970 to 9 percent of the total in 2012.”*



Federal Pell Grants<sup>42</sup> are available to students whether they opt for public, private for-profit or private non-profit institutions. It was found that fewer students from low-income households participated in post-school education and, if they do, more enrol at for-profit than non-profit private institutions (pp.41-42).

Indian students will seemingly continue to resort to private higher education, as they have done over the years since the government will most likely focus on other areas as it strives towards post-COVID recovery (Pushkar, 2021; Mathews, 2020). It is believed that prominent public and private institutions could take advantage of the fact that the exodus of students to study in foreign countries will decline and that the local market could become a “retaining student” one in the current COVID-19 climate (Mathews, 2020).

Dittrich and Weck-Hannemann (2010) indicate that private higher education institutions are part of “quality assurance life” and “are here to stay”. They further indicate that, to cope with private higher education institutions adequately, there should be recognition of the weaknesses and strengths in the private higher education sector. Several constraints faced by private higher education institutions have been identified in the literature, although it is not clear whether all of these are successfully navigated. The next section will elucidate on these constraints within a quality assurance context.

## **2.5 QUALITY ASSURANCE IN HIGHER EDUCATION**

Quality assurance is about good management practice, a systematic approach to doing things right, doing it the right way, and getting it right (Harvey & Green, 1993). It refers to the methods for checking processes and outcomes (Cardoso *et al.*, 2018).

There is a plethora of literature on the topic of quality assurance. Despite the vast literature, Singh (2010) questions whether the research is substantial to inform an opinion on the impact of quality assurance on higher education. Ewell (in Westerheijden *et al.*, 2007, p.145) indicates that there appears to be a consensus that an open, transparent quality assurance approach will better serve the public interest as it serves to promote the credibility of information about “quality”.

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<sup>42</sup> “The Pell Grant is the largest federal grant program offered to undergraduates and is designed to assist students from low-income households.” (<https://studentaid.gov/help-center/answers/article/federal-pell-grant-program>; accessed 3 October 2021)

A group of renowned researchers in the field (Stensaker *et al.*, 2011) did a study on the impact of quality assurance in higher education. They found that although the key functions of quality assurance are to stimulate change and improve learning and teaching, relatively few studies have been done in these areas.

A study conducted in Argentina by De Vincenzi, Garau and Guaglianone (2018) focused on the impact of quality assurance on learning and teaching. In Argentina, *periodic* accreditation (“*reaccreditation*”) of certain undergraduate degree programmes and all graduate programmes is required. Higher education institutions must do self-assessment every six years, followed by external peer review. The study focused on three private higher education institutions (large, medium and small in terms of student enrolment) and surveyed the perspectives of management, faculty and students through structured questionnaires and in-depth interviews. The study found agreement between representatives of the three institutions on the “relevance of quality assurance processes and their impact on the improvement of institutional management and teaching development”. There was evidence of changes to the learning and teaching approach which shifted the focus from traditional teaching-centred to learning-oriented activities. It was also found that programme accreditation led to quality curricula, improved learning conditions and enhanced resources. These changes were associated with improved and systematised internal quality assurance processes as a consequence of external quality assurance measures (*ibid*).

Impact studies appear to be in the infancy stage, with growing interest in this field of research (Damian, Grifoll & Rigbers, 2015). The European Standards and Guidelines (2015) require that member countries analyse their findings and evaluate the impact of quality assurance activities. The European University Association (EUA)<sup>43</sup> finds that its member universities participate in different quality assurance practices in the European Higher Education Area, from accreditation to audits, assessments, reviews, evaluations, and certifications that are conducted regularly, or at fixed or conditional intervals. It also finds that a particular quality assurance function is practised differently across EHEA countries, for example, “institutional audits” in Austria differ from those conducted in the Netherlands or the United Kingdom.

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<sup>43</sup> <https://eua.eu/resources/expert-voices/237:gauging-external-quality-assurance-frameworks-in-the-european-higher-education-area.html>

Quality assurance is at the programme level (e.g. France) or institutional level (as in Finland) or both. There are different approaches to programme accreditation, i.e. perhaps only in certain study fields or where the institution does not have self-accrediting status.

In Germany, for example, programme and institutional (or 'system') accreditation is practised (Damian *et al.*, 2015). There is a strong focus on compliance with specified criteria. Since most German higher education institutions have established internal quality management structures with evaluation procedures, surveys, and statistical analysis there is a relatively balanced interaction between internal and external quality assurance. Although the introduction of quality assurance had certain intended impacts, among others reducing student drop-out and enabling transparency around study programmes, the impact thereof cannot be confirmed as different evaluation procedures have been implemented (*ibid*).

Singh (2010) indicates that the policy rationales for quality assurance are “well-rehearsed tales” of *inter alia*: i) maintaining quality amid massification and differentiation; ii) accountability to stakeholders; iii) demonstrating that higher education is “value for money”; iv) demonstrating the equivalence of offerings for mobility; and v) protecting students. Murray (2012) indicates the need for transparency. Singh (2010) finds that quality assurance extends beyond institutional boundaries and programmes to quality assurance agencies, i.e. quality assuring the quality assurer, for example, through the INQAAHE *Guidelines of Good Practice* for quality assurance agencies and the *European Quality Assurance Register* which lists agencies in compliance with the ESG2015. The level of accountability thus transcends national borders. Singh (2010) calls it “proliferation of quality assurance jurisdictions, structures and activities” and questions the motives and whom it will ultimately benefit. Following Singh’s argument, the researcher agrees that it is not clear whether higher levels of “surveillance” would necessarily lead to the improvement of learning and teaching and students’ learning experience. Whether the CHE would be subject to transnational accountability through its affiliation to SAQAN and other regional agencies is not a given. It is noted, however, that SAQAN has been promised funding and capacity building by international bodies, such as UNESCO (Garwe & Gwati, 2018), which could entail a certain level of

accountability<sup>44</sup>. The CHE (2021a) has committed to capacity building in the higher education sector in support of institutional quality assurance practices.

The South African legislative environment provides for internal and external quality assurance as a means to promote, enhance and sustain quality. The Quality Council should “ensure that such quality assurance as is necessary for the sub-framework is undertaken” (cf. Section 27(i)(iii), Act 101 of 1997). Stensaker *et al.* (2011) indicate that external quality assurance is “much related to structural, organisational and managerial processes within higher education institutions”. This study will consider whether the quality management processes of the institutions sampled during fieldwork link to the CHE’s programme reaccreditation process.

Stensaker (2018) indicates that external quality assurance is found to be related to internal power shifts within an institution. As higher education institutions are held increasingly accountable for learning and teaching outputs, they have systematically built up their quality systems with strong vertical reporting structures. Stakeholders, such as students, industry, and employers, are also becoming increasingly involved in external quality reviews (*ibid*).

The quality assurance process of interest to this study is programme reaccreditation, which is essentially an external review of the existing accredited programme. Accreditation as established quality assurance practice is discussed in the following section.

## **2.6 TYPES OF QUALITY ASSURANCE**

There are different types of quality assurance, such as accreditation and audits. In South Africa and elsewhere, the unit of analysis for audits is the institution itself (CHE, 2021b). Accreditation, which is considered a mark of quality, may be awarded at institutional and/or programmatic level (Kinser, 2014, p.59)<sup>45</sup>. At present, the higher education learning programme is the unit of analysis in the accreditation process employed by the CHE (2004b). Concerning accreditation, the unit of analysis will shift to the qualification upon implementation of the new QAF (CHE,

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<sup>44</sup> (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2017)

<sup>45</sup> Quality assurance processes can be applied to institutions, academic programmes and, less often, individual courses (Kinser & Lane, 2017); (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2017)

2021a). This literature review has a particular focus on accreditation as the external quality assurance measure employed by the CHE in South Africa.

### **2.6.1 Accreditation as external quality assurance**

Accreditation is a widely used external quality assurance mechanism (Chen & Hou, 2016). However, it is applied differently across countries and regions depending on legislation. It is the dominant quality assurance process in the United States, Europe and Latin and South America, and will probably be the case in Africa and Australia as well (Stensaker & Harvey, 2013).

Accreditation is applied differently depending on the legislation and policy of countries where applicable, and the requirements of the accrediting body. For example, in the United States of America, there are six regional commissions responsible for accreditation which leads to differing views of accreditation (Humphreys & Gaston, 2016), whereas in South Africa, the CHE has one set of programme accreditation criteria (CHE, 2004b).

Accreditation forms part of an “accountability system” which should be able to engender trust (Stensaker & Harvey, 2013). Trust is dependent on whether systems are relevant, fair, and open to dialogue (*ibid*). I would add that it should also be transparent. Accreditation also lends “legitimacy” to the programme or qualification. In South Africa, accreditation is an equalizer to some degree in terms of programmes being measured against the same criteria for accreditation, whether presented by public or private institutions. In the new QAF, “legitimacy” as a higher education provider will be achieved through the evaluation against standards for qualification accreditation, institutional and qualification reviews. The private higher education institution achieves “legitimacy” through having accredited programmes that currently have a one-to-one relationship with a registered qualification (which is verifiable once SAQA registers it on the NQF). Once these requirements are met, the institution is registered by the DHET, thus affording “legitimacy” to the institution as a whole. Through achieving programme reaccreditation, there is continued “compliance” with meeting the minimum requirements of the accreditation criteria.

### **2.6.2 Accreditation applied in different regions or countries**

In this literature review, a brief reference to the quality assurance practices in certain regions will be provided, with a specific focus on accreditation and/or reaccreditation

(“review”/ “confirmation” of accreditation). For instance, the United States of America has implemented accreditation through different regional or national bodies. As in South Africa and other parts of the world, there are concerns in the United States about quality, throughput and success and, commensurate with that, direct attention is cast on accreditation as a means of addressing these concerns in the belief that they “serve students more effectively as we assure the public that educational experiences are of high quality” (Humphreys & Gaston, 2016). Where in South Africa, the single Quality Council for higher education has one set of programme accreditation criteria (CHE, 2004a), the six regional commissions in the United States are diverse in their approach which leads to different views, or understanding, of accreditation (Humphreys & Gaston, 2016).

The Council for Higher Education Accreditation (CHEA) is a private non-profit organisation in the United States that coordinates accreditation activity. It is the “National Voice” for accreditation in the United States ([www.chea.org](http://www.chea.org)). The CHEA is the representative body or association for more than 3000 colleges and universities, and over 60 national, regional, and specialised accreditors (CHEA, 2010). The CHEA recognises non-governmental accrediting bodies or organisations that employ a peer-review process to evaluate higher education institutions and/or programmes. These organisations are constituted either partly or fully by the higher education community. The CHEA regards accreditation as a means to assure and improve the quality of higher education. Accreditation is thus both “a process and a status”. It is a mark of “quality education” and a “reliable indicator” of the quality and value of programmes or institutions. The CHEA believes the value of accreditation lies in the fact that *inter alia*: i) it encourages confidence in the institution or programme; ii) a fair, neutral external process has been followed (by a non-governmental organisation) which confirms the quality of a programme and/or institution; and iii) signals that widely accepted educational standards have been met. Accrediting an institution does not necessarily mean that a programme is accredited. The status of the accrediting body is reviewed every five to ten years to determine whether it meets the standards for recognition (*ibid*). The accreditation of a programme or institution is reviewed every few years, even up to ten years (Eaton, 2012). Accreditation is therefore not granted for an indefinite period and self-accreditation is not practised (*ibid*).

In the United States, institutional quality assurance is the norm, and the regional and national accrediting bodies follow a peer-review process, which includes site visits, and require institutions to do self-evaluation for reaccreditation purposes (CHEA, 2010; Kinser & Lane, 2017; NECHE, 2019). Institutions in the United States are not self-accrediting and need to undergo institutional reaccreditation with the relevant regional accrediting body. For example, Yale and Harvard, both Ivy League institutions, undergo voluntary peer review for institutional reaccreditation within ten years (NECHE, 2019)<sup>46</sup> and school, department and/or programme accreditation by different accrediting bodies depending on the relevant accrediting body in the field (<https://www.chea.org/harvard-university>), for example, the School of Architecture at Yale is accredited by the National Architectural Accrediting Board<sup>47</sup>. Both Yale and Harvard need to submit a fifth-year interim report to NECHE (<https://accreditation.yale.edu/>; <https://oir.harvard.edu/accreditation>). The Harvard FAQ on accreditation indicates that four purposes are served by gaining institutional accreditation (and reaccreditation): i) assure quality to the public; ii) ease student transfer between institutions by signalling quality; iii) provide institutions with access to federal financial aid; and iv) certify a graduate's credentials to employers. Accreditation is viewed as “an opportunity for reflection, honest assessment of strengths and weaknesses, along with a chance to develop strategies for continued improvement” (<https://oir.harvard.edu/faq/what-accreditation-why-should-university-be-accredited>). Stanford University receives its institutional accreditation from the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges (<https://wasc.stanford.edu/>) – the last review was done in 2013, and the next will be 2022-23, thus ten years as well. As in the case of Harvard and Yale, certain programmes at Stanford receive programme accreditation depending on the field and relevant accrediting body (<https://web.stanford.edu/dept/registrar/bulletin1112/4068.html>).

While Harvard, Yale and Stanford may serve as examples of sustainable quality higher education, Marginson's (2016) reflection on private higher education outside the US, i.e. “problems of low and variable quality, especially for-profit colleges”,

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<sup>46</sup> The New England Commission of Higher Education (NECHE) is one of six regional accrediting bodies in the USA.

<sup>47</sup> <https://accreditation.yale.edu/yale-specialized-accrediting-agencies>



leads one to consider the current state of private provision in the US in comparison. The US higher education sector is diverse with private provision ranging from small, religious institutions to large for-profit enterprises, with a physical and/or web presence (Brown et al., 2017, p.7). A new institution entering the sector could undergo an accreditation process that takes between “five and ten years to complete”. Once accredited, “reaccreditation” occurs every ten years, usually with a “mid-term check on their operations” in place (*ibid*), as indicated for the above Ivy League institutions. There is flexibility in the system in that institutions are permitted to set their own goals for improvement and reflect progress towards their attainment (*ibid*). The federal government and state government play a meaningful role in the regulatory framework, particularly in terms of funding. However, Brown *et al.* (2017, p.9) indicate that “few states require that approved institutions meet academic benchmarks, and most have not taken action against low-quality institutions”. On the whole, an institution can either be “reaccredited” or “not reaccredited”, with most meeting the former regardless of “doing well or poorly” (*ibid*). Tighter federal regulations, such as the “gainful employment rule”, were enforced on specifically for-profit institutions in 2012 requiring mainly that students should secure employment upon graduation thus providing a return on their investment (*ibid*). The Department of Education’s 2017 data indicate that 800 programmes did not meet the standards for the “gainful employment rule”, of which 98% were offered by for-profit institutions.

The federal government strengthened its oversight on the financial viability of institutions which led to the closure of several smaller institutions and increased oversight of those in financial distress (Brown et al., 2017, p.16). The federal government also withdrew recognition of an accreditor, viz. the Accrediting Council for Independent Colleges and Schools, due to “pervasive compliance problems”. Thus, issues of non-compliance or poor private higher education provision also plague the US – not only Africa, or Asia and Latin America.

As part of the programme reaccreditation process in South Africa, private higher education institutions perform self-evaluation or, at the very least, programme review (CHE, 2004a). The external quality assurance system in South Africa is also a peer-review process which could include a site visit conducted by a panel of peers (CHE, 2004b). Harvey (cited in EUA, 2009) indicates that the peer-review process could be viewed both as a democratic process or a biased approach. It would be of interest to



note how private higher education institutions view the peer-review process that is followed during the programme reaccreditation cycle.

In some countries, institutional accreditation is granted in addition to programme accreditation. For example, in Taiwan, self-accrediting institutions accredit their programmes and develop standards for evaluation through internal quality assurance management processes (Chen & Hou, 2016). Internal quality assurance management processes enable institutional autonomy and institutional self-improvement (Chen & Hou, 2016). Self-accreditation is only at the programme level, not institutional, and all departments are involved in a programme review process which ostensibly leads to programme improvement.

Malaysia employs both institutional audit and accreditation as quality assurance tools (Kinser & Lane, 2017). Most institutions are non-self-accrediting and subject to “review” every five years, whereas four public and four private “international branch campuses” have self-accrediting status (Chen & Hou, 2016). In South Africa, the responsibility for “accreditation” in the higher education sector rests with the CHE (RSA, 1997) and institutional self-accreditation is not practised.

Before the establishment of the Accreditation Council in 2017, there was no recognised quality assurance body in Bangladesh (Kinser & Lane, 2017). The national University Grants Commission thus constituted a Quality Assurance Unit to ensure the establishment of a quality assurance “cell” in both public and private universities that would be responsible for self-assessment of internal quality assurance mechanisms. The Accreditation Council, which is an independent statutory body (like the CHE in South Africa), is tasked to accredit the programmes of public and private institutions that are to be measured against the same standards. Accreditation will initially be for a year, with subsequent five-year accreditation certificates to be issued (*ibid*).

The United Arab Emirates has a rapidly-evolving higher education system with a rapidly-evolving quality assurance system in place (Kinser & Lane, 2017). Private higher education institutions have mushroomed over the past twenty years. The Commission for Academic Accreditation (part of the Education Ministry) has to license the private provider and accredit its programmes. The country finds it challenging, though, to enforce these regulations with the multitude of private

providers in the higher education sector, primarily because certain Emirates have permitted foreign providers to operate in free trade zones (*ibid*).

In Australia, a higher education review was initiated by the government in 2008 (Shah & Jarzabkowski, 2013). This led to the establishment of the Tertiary Education Quality and Standards Agency that has as part of its responsibilities the registration of all higher education providers and accreditation of courses offered by non-self-accrediting providers. There was a shift from a “fitness for purpose” approach to a compliance-driven approach with externally set standards whereby sanctions can be placed on non-compliant providers. The authors find that the elite universities in Australia regard the compliance-driven approach as “counter-productive” indicating that it will “stifle diversity, erode quality and reduce the flexibility necessary to respond to unexpected needs”. These universities found the new quality assurance regime to be heavy-handed. The authors believe that encouraging increased ownership of institutional quality assurance processes would be more beneficial for the enhancement of quality and embedding a quality culture to engage academics (*ibid*).

Chen and Hou (2016) indicate that “self-accrediting and non-self-accrediting” approaches exist in Australia whereby “non-self-accrediting” institutions undergo accreditation and evaluation in seven-year cycles (the cyclical process is similar to “programme review”/ “reaccreditation”/“reaffirmation” or “confirmation” of accreditation). Hong Kong’s approach is similar. Non-self-accrediting institutions are mostly private higher education institutions that are externally accredited by the quality assurance agency (*ibid*).

In Europe, there are different quality assurance models, although the ESG (2015) remain the common reference point for quality assurance in the European Higher Education Area (Prisacariu, 2015). In Austria, for example, programme accreditation only applies to new (public) providers and private higher education institutions. Existing public higher education institutions sign a performance agreement with the government. Programme accreditation is for a limited period and reaccreditation is granted following evaluation by the national quality assurance agency or international quality assurance bodies (Kohler, 2009).

In the European Union, each member state is responsible for its education and training, and quality assurance processes. For example, in Spain, there are ten regional quality assurance agencies, each responsible for ensuring quality in the respective regions (Rios, 2015). In Spain, accreditation is utilised more widely as a quality assurance tool (*ibid*). In the Netherlands, one of the pioneering countries in quality assurance in Europe, programme accreditation serves as a “quality label” with “second-round accreditation” coupling programme accreditation with institutional audit (Chu & Westerheijden, 2018). The second round strives to award “good” or “excellent” programme labels to move institutions beyond the quality threshold (*sic*).

In Finland, national quality assurance is based on comprehensive (external) systems audits (Bejan *et al.*, 2015). Accreditation as a quality assurance tool is not used, although Finnish universities might seek international accreditation (Eklund, 2013, p.9). The Finnish regard quality assurance as a means to improve the quality of teaching, research, and programmes (Eklund, 2013, p.9). Eklund (2013, p.8) remarks that the signing of the Bologna Declaration<sup>48</sup> heralded the convergence and standardisation of higher education systems in Europe. Eklund (2013, p.7) indicates that Finland reviewed its quality assurance processes to align with the standards and guidelines of the European Network for Quality Assurance (ENQA) which is a membership association for quality assurance agencies in the European Higher Education Area<sup>49</sup> (EHEA) (<https://www.enqa.eu/about-enqa/>; accessed 30 September 2021). The quality discourse in Finland emerged in line with these agreements. Quality assurance is viewed as part of the “broader trend of accountability, efficiency and steering” (*ibid*). The Dutch did much the same when they reviewed their quality evaluation and quality enhancement approach to adopt an accreditation and accountability approach (Chu & Westerheijden, 2018). Schmidt (2017) posits that quality assurance policies in Scandinavia have been crafted within the framework of the Bologna Process and the European Standards and

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<sup>48</sup> The Bologna Process (starting with the Sorbonne and Bologna Declarations) “was a response of national governments to the challenges arising from the mobility of European students and graduates”. It sought to bring coherence to higher education systems across Europe. For this purpose, the EHEA was established ([https://ec.europa.eu/education/policies/higher-education/bologna-process-and-european-higher-education-area\\_en](https://ec.europa.eu/education/policies/higher-education/bologna-process-and-european-higher-education-area_en)).

<sup>49</sup> The European Higher Education Area (EHEA) is a collaboration between 49 international countries whereby they agree to, and adopt, reforms on higher education on the basis of common key values to make their higher education systems more compatible and strengthen their quality assurance mechanisms in order to facilitate student mobility and employability (<https://www.ehea.info/>).

Guidelines<sup>50</sup>. Before the EHEA, the Nordic countries had already established a common network of quality assurance agencies (*ibid*), which demonstrates collaborative effort early on as well as continuity. Institutions are largely responsible for their quality assurance and have management processes in place. The external audits that are conducted require prior internal reflexive practice and a self-evaluation report and are carried out through site visits by the national accrediting agency and peer reviewers from universities (Eklund, 2013, p.5). A similar peer-review process is followed by the CHE in its institutional audit and current programme reaccreditation processes (CHE, 2021b, p.27; CHE 2004b, p.30).

In East Africa, the higher education regulatory agencies in Kenya, Tanzania and Uganda utilise quality assurance processes such as reviews and accreditation of new institutions and programmes. The three agencies reached an understanding in 2006 to “harmonise and streamline” their procedures and formalise “inter-agency collaboration” to ensure quality higher education in the region (Harvey in EUA, 2009). Both internal and external quality assurance is practised.

In their review of quality assurance in the SADC region, Hoosen *et al.* (2017, p.11) indicate that “all countries have a body/unit responsible for ensuring the quality of higher education” and that the “presence of institutional level QA is less clear”. They also indicate that different quality assurance processes are used, such as accreditation and audits, and that these may be applied differently to private and public higher education providers. Other quality assurance approaches include “programme validation”, “compliance visits”, “registration of institutions” and “support visits”. It should be noted that, in South Africa, the CHE conducts site visits to verify compliance, and utilises both programme accreditation and institutional audits as quality assurance measurement tools. In Namibia, the institution and its programmes are accredited for three years following which the provider must apply for reaccreditation and, in Tanzania, the institutions need to do “self-assessment” every five years as part of a reaccreditation process (Hoosen *et al.*, 2017, p.127). It is thus evident that the South African context is not unique in expecting institutions to

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<sup>50</sup> The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) were first adopted by the Ministers responsible for higher education in 2005, thereafter the revised ESG was adopted by the Ministers responsible for higher education in the European Higher Education Area in May 2015 (<https://www.ehea.info/page-standards-and-guidelines-for-quality-assurance>).

confirm/reaffirm the quality of their programmes through processes similar to programme re-accreditation conducted by the CHE.

## **2.7 PROGRAMME ACCREDITATION AND REACCREDITATION IN SOUTH AFRICA**

Quality assurance in South Africa is one of three steering mechanisms to achieve transformation in the higher education sector; the other two being funding and policy-based planning (CHE, 2021; Singh & Lange, 2007). The CHE is fulfilling its mandate of quality assurance promotion through conferences, e.g. the Quality Promotion Conference held in 2019 (<https://www.che.ac.za/>) and online webinars and colloquiums held under COVID-19 restrictions. It also fulfils its audit mandate with the advent of a new cycle of institutional audits launched in 2021. Private higher education institutions will be included in the institutional audit cycle from 2022 onwards and it is envisioned that programme reaccreditation will be an outcome of the audit process.

The CHE's other mandated quality assurance function is programme accreditation. All higher education institutions are required to submit their programmes for accreditation. Although the *Framework for Programme Accreditation* (2004a) stipulates that new one- and two-year programmes may be accredited for a maximum of three years, and those of three-year duration or longer may be accredited for a maximum of six years, this has never been stipulated by the CHE when awarding programme accreditation status. Accredited programmes retain their status until such time it is reviewed through programme reaccreditation (for programmes offered by private providers), National Review of programmes, when new qualification standards are introduced, a revised scope of practice promulgated, or new regulations published (e.g. new nursing regulations by the South African Nursing Council; <https://www.sanc.co.za/regulations/>). About ten years ago, the CHE confirmed the accreditation status of all programmes in the system up to 2009 through its HEQSF-alignment process (cf. "Joint Communique 3"; DHET, SAQA & CHE, 2009/10). This coincided with the implementation of the new ten-level NQF (CHE, 2013). All existing qualifications had to be aligned to the relevant sub-framework on the NQF and those deemed alignable could continue to be offered. Qualifications that did not meet the requirements for HEQSF-alignment had to be discontinued and could no longer be offered (DHET, 6 July 2016).

As discussed earlier, private providers in South Africa seek accreditation of their programmes by the CHE as a mark of compliance with regulatory requirements. Reaccreditation is a mark of continued compliance and sustained programme quality. Many institutions seek programme and/or institutional accreditation with regional and/or international bodies to promote the portability of their qualifications (and perhaps confirm the quality thereof all round). Gilbert (2020) references Hazelkorn (2011) who deems accreditation a “coveted quality mark, which transcends national boundaries”. Kinser and Lane (2017) indicate that quality assurance (albeit in the form of audit or accreditation) affords legitimacy to a programme or institution which, in turn, signals recognition of its value or benefit to society.

The *Criteria for Programme Accreditation* (CHE, 2004b, as amended) comprise 19 criteria of which up to nine (applicable to postgraduate programmes) are used for initial (new programme) accreditation and the full set of criteria apply to programme review. Each criterion consists of minimum standards that need to be met for compliance in a specific area<sup>51</sup>.

Accreditation in a quality assurance system is linked to accountability. A system of accountability intends to engender trust in the system (Stensaker & Harvey, 2013). This is a contradiction of sorts in that if two parties trust each other, there is no need for an accountability system. It is because the level of trust has been eroded over time that accountability systems have been established. “Procedures, standards, rules and regulations ... are then the proxies of trust”. A system that is “relevant, fair and open to dialogue” results in trust – trust that the system is producing what is needed at a reasonable cost and trust in the fact that institutions deliver what they are required to do (*ibid*).

The Dutch system is illustrative of the fact that institutions will strive to deliver what is required, mandated, or delegated even if only at a minimum because there are high stakes, such as government funding of accredited programmes (even for private

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<sup>51</sup> “The accreditation model is designed to make an institutional assessment. A positive decision means the institution, department or programme can continue to operate. A negative decision typically leads to probation, restrictions or closure. The assessment model is a formative process, intended to provide feedback for improvement. The goal is to identify weaknesses and ensure they will be promptly corrected”. (United Nations Educational, Scientific and Cultural Organization (UNESCO), 2017)

institutions) (Chu & Westerheijden, 2018). Those that fail to be accredited will not be funded nor may new students be enrolled. Accreditation serves as a gatekeeper and is confirmation of the status quo. It is believed that “constructive cooperation of higher education providers with government is the cornerstone for improving quality”. To strike a balance between accountability and quality enhancement, the government needs to cede some control over quality assurance to the higher education institution (*ibid*), which is indicative of trust. Shared ownership of quality and quality assurance could be more cost-effective and contribute to building a quality culture.

It is argued that the need for greater accountability has placed stress on academics and that they are subject to more bureaucratic controls and have decreased autonomy (Altbach *et al.*, 2009, p.20). Despite the acknowledgement that higher education “quality” is no longer a given and that it must be assured, there is concern about the erosion of institutional autonomy in relation to the quality assurance processes that are applied (*ibid*). This could present as a barrier to the institution in terms of its internal quality assurance processes.

## **2.8 BARRIERS OR CONSTRAINTS IN TERMS OF COMPLIANCE**

In this section, the barriers or constraints that private higher education institutions might face will be explored. These constraints might hinder the ability of a private higher education institution to become, or remain, compliant with accreditation criteria. Non-compliance points to “obstacles to quality in higher education” (Cardoso *et al.*, 2016). Cardoso *et al.* (2016) indicate that “there is little theoretical knowledge addressing obstacles to quality in higher education”.

Cardoso *et al.* (2016) explored academics’ viewpoints on why quality was not achieved in higher education. Their study, which focused on the “main obstacles to quality”, was confined to Portugal. However, they argue that other countries or institutions could learn valuable lessons from their study. Cardoso *et al.* (2016) found that institutional governance and management was considered “poor”, and similarly organisational culture, which was more profit- than quality-driven. Academics believed that the processes, regulations, or criteria that framed management activity were either “absent, insufficient or constantly changing”. They viewed leadership as lacking “vision” and management skills and abusing their power.



Other obstacles that were identified were ineffective human resources management, lack of support for academics and their work, no incentives or recognition or career progression, and shortcomings in infrastructure, resources, and support systems. Respondents also had a negative view of internal quality assurance mechanisms and the financial situation of the institution. Internal quality assurance was viewed as internal control rather than a tool for change – a means of merely replicating external quality assurance. They identified the “absence’ or ineffectiveness of the institutional quality culture (which is defined as the “strategies and procedures promoting quality and its assurance”) and “the ‘low’ or ‘decreasing’ quality of institutions, study programmes, graduates and academics”. The existing set of policies and guidelines for higher education, and the legislative framework aimed at regulating higher education, was considered an obstacle as well. Academics perceived these to be “inadequate” and “limiting” and “preventing ‘adequate reflexion’” (*ibid*).

Academics regarded their disinterest and “passivity” as “hindrances” to quality (Cardoso *et al.*, 2016). One of the main reasons for this was their perceived heavy workload which includes teaching, research, administrative tasks, “course design” and planning and “self-improvement”. Since the above “obstacles” were identified from various views including academics from the private sector, it would be noteworthy to determine whether any of these manifest in the private sector in South Africa. It would be noteworthy, in terms of the accreditation criteria of the CHE (2004a), to determine to what extent academics are involved in the programme design and review process and the nature of their involvement in institutional quality assurance practices.

Boateng (2014) found that capacity-building was required in terms of internal quality assurance at private higher education institutions in Ghana and that the levels of experience and resourcing in private institutions posed a challenge for implementation. Boateng further indicates that student participation in internal quality assurance processes was limited. Moyo and Boti (2020) indicate that, while students could add value to quality assurance processes, there is a limited engagement or inclusion of students in this regard. Most students who participated in the study conducted at two comprehensive universities in South Africa demonstrated a lack of understanding about quality assurance or the possible role that they could play in the process (*ibid*). It is my opinion that an intensive, widespread, multipronged and multi-



platform advocacy campaign would serve to conscientise students for them to better identify “bad actors” in the sector. Furthermore, if students were aware of quality indicators, they would be in a better position to determine whether they are at the receiving end of a quality programme. Student feedback is important for programme review. For accreditation criterion 19, the CHE requires the following:

*“User surveys, reviews and impact studies on the effectiveness of the programme are undertaken at regular intervals. Results are used to improve the programme’s design, delivery and resourcing, and for staff development and student support, where necessary.”*

This study sought to determine whether feedback was solicited from stakeholders and whether structures and procedures are in place to use feedback in a review process for quality enhancement purposes.

Feedback from the reaccreditation process should not be viewed in isolation but linked to feedback from other processes (i.e. new programme accreditation and institutional audit) to identify similar issues for attention. It should also be linked to quality promotion activities hosted by the CHE or other stakeholders whereby insights can be gained of best practice<sup>52</sup>.

Tamrat (2017) outlines the following challenges *inter alia* experienced by private higher education institutions: 1) they are limited in terms of scope, size and pace of growth; ii) the proliferation of private higher education institutions leads to speculation on legitimacy and recognition which affects reputation, acceptance and trust; iii) private higher education institutions in Africa face legitimacy challenges as a result of the profit motive and individual behaviour; iv) wariness of private higher education institutions due to the perception of “low academic quality” and “hyper-commercialism” due to separation from the state; v) the “significant burden” of private higher education institutions in “addressing the concerns of students, parents, the government and other stakeholders in maintaining their quality and integrity”; and vi) resource limitations which pose “serious impediments to their operations”.

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<sup>52</sup> (cf. <https://www.che.ac.za/content/che-qa-workshop-8-october-2015-pheis>;  
<https://www.che.ac.za/content/qep-workshop-private-providers-17-18-september>;  
<https://che.absol.co.za/sites/default/files/events/Tinto%20South%20African%20Keynote%2028Nov2017.pdf>)

Stander and Herman (2017) indicate that quality assurance in the private higher education sector is a “contested area”. Although one of the aims of quality assurance is “protecting the public from unscrupulous providers”, private higher education institutions regard it as complex and difficult to manage which places pressure on the institutions (Stander & Herman, 2017). The private higher education institutions indicated that they are over-regulated and there was a call for more developmental activities instead (Stander & Herman, 2017). Hoosen *et al.* (2017, p.151) also refer to the perception that the South African system is “over-regulated ... in a bid to address poor providers”. This study included a question on the concern about over-regulation in the interview schedule; the findings are discussed in Chapter 5.

Stander and Herman (2017) indicate that financially stable institutions have a better chance at survival. They found that the timeframe for the accreditation process to be completed impacts revenue for all private higher education institutions as they cannot enrol students until the programme is accredited and registered. It should be noted that Stander and Herman (2017) focused on the initial accreditation of programmes whereas this study will focus on reaccreditation which is applied to existing (already accredited) programmes and is a determination of whether the private higher education institution has remained compliant and can continue with higher education offerings (CHE, 2004a & b). The accreditation process in itself can be a costly exercise to the institution. Private higher education institutions are expected to pay for each service rendered by the Quality Council, i.e. every process (such as accreditation and reaccreditation) and proceeding that emanates from the outcome (e.g. a site visit or representation) (cf. “*What does it cost?*”; <https://heqc-online-1.che.ac.za/>).

Stander and Herman (2017) identified several barriers and challenges experienced by private higher education institutions in South Africa. The study found three key areas where challenges or barriers are experienced: 1) resources; 2) capacity development; and 3) programme design. The findings of the study indicate that financial and physical resource constraints impact the quality of higher education offerings. Stander and Herman (2017) also point to staffing constraints and that private higher education staff often “multi-task” and fulfil different roles and responsibilities. Private higher education institutions resort to employing part-time staff and outsourcing key functions to consultants as a cost-effective measure to

address the human resource deficiency (Stander & Herman (2017)). However, the extent and nature of consultants' involvement in programme design, delivery, internal quality assurance and the programme reaccreditation process are not clear. Reliance on external parties and part-time/temporary staff points to a certain measure of instability or discontinuity in the processes and procedures of a private higher education institution. It should be determined what the impact is on programme design, delivery and review as well as the institutional mission if there is no buy-in to the vision by these parties.

Resource constraints seem to be a consistent finding across the aforementioned studies. It would be of interest to this study to determine whether this occurs in reaccreditation outcomes (in terms of conditions for reaccreditation or reasons for withdrawal of accreditation) and the efforts of private higher education institutions to be compliant.

## **2.9 TRENDS IN QUALITY ASSURANCE**

Internationally, there has been a move towards new (revised) national quality systems or frameworks. There is a shift towards placing greater emphasis on institutional (internal) quality assurance, as is the case in European countries such as Sweden and Belgium, thereby placing “ownership” and “responsibility” on institutions which is intended to have them act “proactively” instead of “reactively” (Boström & Kettis, 2016; Aubert-Lotarski & Duykaerts, 2017). In the United States, there has been “Rethinking Higher Education” and “Accreditation Reform” (USA Department of Education, December 2018a & 2018b).

Stensaker and Harvey (2013) identify several global trends in quality assurance: firstly, the strong link between accountability and quality assurance that has emerged. Quality assurance has become the “core global accountability instrument in higher education”. Another global trend is the establishment of agencies in charge of national quality assurance systems. There are usually several reasons for instituting these agencies (cf. the Higher Education Act of 1997 and NQF Act of 2008, as amended, in the case of South Africa), which can include exercising a measure of control over private providers. A third trend is the government's growing interest in accountability as can be seen in China, Latin and South America, the United States, Africa, and Europe. The researchers identify the emergence of

accreditation as the dominant quality assurance procedure in developed and developing countries. It appears that mature agencies in established quality assurance systems are moving towards “a more controlling brief” (*sic*).

There is greater awareness of quality assurance, for instance, in Botswana where students report any decline in programme quality to the relevant authority (Hoosen *et al.*, 2017:52). There is an identified need for capacity building, for example in Mauritius and Mozambique (Hoosen *et al.*, 2017:52; 62). Hoosen *et al.* (2017) indicate that one of the topics identified for capacity development was to understand how to “integrate QA activities so that they do not run parallel to what you do (i.e. actual quality v compliance quality)”. This raises the question of whether this understanding exists in the private higher education sector in South Africa.

The improvement of learning and teaching in African higher education has taken a blow as a result of the COVID-19 pandemic (Mohamedbhai, 2020). Unplanned online delivery and lack of access to laboratories for science and technology programmes, in particular, will have consequences at a time when these areas are needed for development (*ibid*) (DHET, 2021b).

The CHE (February 2018) has identified several trends in the private higher education sector. Among these is the growing trend in litigation initiated by private higher education institutions if accreditation is withdrawn (Samuels, 2019; Naidoo, 2019). A few cases<sup>53</sup> serve as evidence of litigation that was initiated after a reaccreditation process was followed and programme accreditation withdrawn.

The CHE (February 2018) indicates that change in ownership is prevalent due to the acquisition of individual institutions by local investment groups or larger private higher education institutions. As discussed in the previous chapter, there is also growing interest from international organisations in acquiring existing institutions instead of following the protracted route of registering a new institution with the DHET and having programmes accredited by the CHE. The size and shape of the sector are thus further evolving. It would be of interest to determine how this affects

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<sup>53</sup> (<https://pmg.org.za/committee-question/11866/>;  
<https://www.news24.com/fin24/companies/retail/private-college-faces-closure-over-accreditation-dispute-20170325>; <https://www.dailymaverick.co.za/article/2021-04-20-education-authorities-consider-action-against-damelin-college-after-flood-of-student-complaints/>)

the programme review process as the institutional vision and mission might be revised if there is a change in management.

## 2.10 QUALITY MANAGEMENT

The new Quality Assurance Framework of the CHE (2021a) places greater emphasis on internal quality management by higher education institutions. It is anticipated that institutional arrangements will be in place for the management of quality higher education and that institutions will accept responsibility and accountability in the quality assurance process. Quality management is predicated on structures, systems and procedures being in place to “check, control and assure quality” (Parsons, 2017).

Westerheijden, Stensaker and Rosa (eds., 2007, p.1-2) indicate that “quality” is a central theme in how higher education operates: thousands of higher education institutions do “quality management”; “assessment”, “audits”, and “accreditation” are used as quality assurance “tools”, or instruments; and there are different institutional quality management arrangements in place. Stensaker (in Westerheijden *et al.*, 2007, p.99-118) indicates that evaluation systems, management systems and information systems are combined in various ways in internal institutional arrangements. Stensaker (*ibid*) refers to Dill (1992) who identified three approaches to quality assurance, namely: i) the reputational approach – which uses a peer review system to evaluate (and sometimes rate) the quality of the programme or institution; ii) student outcome approach – which is based on the measurement of outcome indicators such as student achievement, careers, earnings, etc.; and iii) total quality (management) approach – which emphasises “broad participation, client orientation, organisational learning, and coordination”. It has been found that these approaches are increasingly linked to each other. If “quality” is seen as transformative, then the quality assurance process becomes an improvement-oriented approach.

The idea of “quality” has its origin in business and industry, and many have questioned how this could be translated to higher education, a context in which “quality” could have different connotations. However, if the dominating definition is taken as quality equals “fitness for purpose”, it allows it to be a flexible concept. Harvey and Green (1993) postulate that “Every product and service has the potential

to fits its purpose and thus be a quality product or service”. The idea of “quality” can then be adapted or translated to “numerous ‘problems’ in higher education. Harvey and Green (1993) indicate that the definition of quality as “fitness for purpose” could present a problem if the “purpose” in higher education is unclear.

Zaki and Rashidi (2013) find that quality in education “is achieved when education output conforms with the planned goals, specifications and requirements”. The researchers (*ibid*) further indicate that quality can manifest in different forms depending on the number and nature of institutions, stakeholders, regulatory bodies, among other factors, which is why a framework for quality assurance, with criteria for its evaluation, should be in place.

The Quality Assurance Framework (2021) of the CHE seeks to adopt a differentiated approach to external quality assurance. The CHE is cognisant of the diverse nature of the sector with its different levels of maturity in terms of institutional quality assurance systems, different institutional types and institutional missions, and myriad ways in which the quality of higher education offerings could manifest and be managed. A set of standards (and criteria, with guidelines) will be in place that will consider differentiated institutional contexts and quality management approaches (CHE, 2021a, p.34). However, as the idea of “quality” is contextual, as per Zaki and Rashidi (2013), the CHE needs to review the criteria commensurate with developments in the sector, regulations, and so on. The accreditation criteria of 2004 (as amended in 2012) cannot perhaps all be relevant to the context in which they are applied in 2021. Thus, the standard might be set but the criteria to evaluate whether the standard has been met might need to be reviewed. In terms of a differentiated approach to institutional quality management, each higher education might have different structures and systems in place to “manage for quality”.

The roots of quality management can be traced back to statistical quality control in the United States in the 1930s and to its proponents in the 1950s, namely William Edwards Deming (in the US) and Joseph Juran (in Japan) (Barouch & Ponsignon, 2016). Barouch and Ponsignon (2016) explicate that the principles, tools and methods of quality management were initially employed to improve production lines in manufacturing companies but, since the 1980s, it has been incorporated in nearly all spheres, including service sectors and education, and has become a “mainstream

managerial approach”. The researchers found that quality management is a “nebulous concept” as it means different things to different people and is thus differently or inconsistently applied. As such, managers tend to focus on certain aspects based on specific needs and overlook others. Since the conceptualisation of quality management fell outside of academia, there have been various questions as to its theoretical foundation. The researchers indicate that quality management theory can be grounded in the integration of three epistemological paradigms, viz. the systemic, pragmatic, and constructivist paradigms, or an integrated, multi-paradigmatic approach which makes quality management theory “more approachable” (*ibid*).

Stensaker (in Westerheijden *et al.*, 2007, p.101) indicates that several “fads” or “fashions” concerning quality management have entered the higher education system over the years but that higher education institutions are generally reluctant or find it challenging to adapt to these. The three most popular entrants in the public sector are downsizing, re-engineering and total quality management (TQM). These quality management approaches are incompatible for the following reasons: i) downsizing means staff are expendable whereas TQM finds staff integral to the quality management process; ii) and re-engineering means disassembling the organisation and restarting again whereas TQM refers to continuous, incremental improvements.

Besides TQM, various other quality management models have been introduced in higher education over the years. An example of a quality management practice that has been adapted for the higher education context is the Balanced Scorecard which is a framework comprising four perspectives (financial, customer satisfaction, internal process and learning and growth [future-readiness]) that is used to assess the performance of an organisation; it aligns the organisation's strategic objectives with performance measures (linked to key indicators) (Al-Hosaini & Sofian, 2015).

Brookes and Becket (2007) did a study on the quality management models that have been either conceptualised or adapted from industry/business models and applied in higher education. Besides the Balanced Scorecard, more than 15 other models were found *inter alia* ISO9000, Malcolm Baldrige Award, Quality Management in Higher Education, and Quality Management Framework. Added to this list is a recent one,



namely ISO 21001:2018 which Gilbert (2020) argues has the “potential to change and challenge higher education accreditation” as it can be used alongside, instead of, or inside an existing quality assurance structure.

Brookes and Becket (2007) found limitations to adapting industry/business models to higher education, which include lack of effective leadership in their implementation, and having greater relevance in assessing administrative and service functions rather than research or learning and teaching. The authors indicate that there should be “management for quality” instead of “management of quality” whereby the “quality of student learning is central to any quality management programme” (*sic*). In my opinion, this makes sense in a quality assurance framework as “management of quality” does not necessarily signify transference or conveyance of effort to a recipient (albeit a programme or the student).

Edwards (2012) posits that higher education is “inherently ‘risky’” due to expansion, diversification and the need to “innovate to survive”. Edwards points to the Australian higher education quality assurance system where it was determined that reaccreditation and audit processes ought to be based on “a realistic risk assessment”. With COVID-19 as an example of how institutions were forced to respond and adapt in a short amount of time to the challenges presented, at high risk to established plans, it is plausible that a risk-based approach should be intrinsic in a quality management system. The CHE (2021a, p.54) will also follow a risk-based approach in identifying areas of concern in institutions – in categorising these risks (e.g. short-term or long-term risks; or operational or strategic risk; or in terms of qualification versus programme; or serious vs low risk), a differentiated approach could be taken as to which institution requires the greater amount of support or the type of support required to mitigate the risk of withdrawal of accreditation, or potential risk for closure of an institution (if the DHET follows the same approach), and so forth.

Zaki and Rashidi (2013) devised a quality assurance framework, namely the “Octet of Quality”, comprising eight factors that they consider crucial for driving an institution towards the realisation of “quality”. The octet of factors is policies and practices; institutional leadership; institutional design; curriculum; faculty skills, knowledge, and attitudes; resources; learners’ profile; and open system thinking. The authors posit



that higher education institutions need to adopt open systems thinking to enable them to cope with challenges and change (*ibid*).

This study adopts a conceptual framework based on a Systems Approach (as discussed in Chapter 3), which is premised on the fact that private institutions need to be open systems to process feedback internally via systems, structures and procedures while making use of available resources to enable output of a quality programme. Barouch and Ponsignon (2016) indicate that the Systems Approach to quality management offers only a partial view of effective quality management within an organisation, thus the limitation of this study is recognised.

The quality management processes in place will determine the outcome of the internal quality assurance process, which could be one of several, according to Brennan (2018):

- *“Obtaining a licence to practice*
- *Gaining or losing reputation*
- *Gaining or losing autonomy and/or control*
- *Gaining or losing funding*
- *Improvement or damage to academic and organizational processes*
- *Greater innovation or greater conformity.”*

The impact of quality management is usually noted after an external review or following the publication of quality data (Brennan, 2018). In other words, the responsiveness of an institution and its staff, or the impact on them, is linked to a specific external quality assurance event in terms of preparation for it and the experience and outcome thereof. Elken and Stensaker (2018) indicate that external quality assurance impacts higher education institutions and that they need to cater for these “external expectations”. This study served to determine how staff at a private institution experience the programme reaccreditation process (both internally and externally), what the requirements are of them as staff participating in the process, whether the process adds value in terms of internal quality assurance or proves deficient to have any effect. Cardoso *et al.* (2018) find that teaching and non-teaching staff in Portugal are experiencing internal quality assurance as increased bureaucracy through more formalised procedures, greater demand for non-academic activities, and increased monitoring of academic performance.

The programme reaccreditation process should not be seen as a standalone external quality assurance event but rather as part of a continuous external quality assurance process aimed at maintaining and enhancing higher education quality. It should also not be seen as an “event” that affects only a few in the organisation. Elken and Stensaker (2018) state that “quality work”, which includes the “mundane day-to-day activities that are undertaken to enhance and maintain educational quality” involves a “variety of actors” indicative of quality management and quality culture. An impact of external quality assurance could be the recognition that broader cultural change is needed in the organisation which may lead to the development or nurturing of an internal quality culture based on “widespread commitment to quality and its improvement” (*ibid*). This study served to determine whether this “widespread commitment” is evident in the participating institutions. Actions shape organisations and it is to be determined which “embedded actors” participate in the quality management process where “their identities and conception of roles are shaped by institutional rules” (Elken & Stensaker, 2018), the level of contribution and how this serves the institution in achieving programme accreditation.

## **2.11 CONCLUSION**

The literature indicates the growth and expansion, and diverse, evolving nature of the private higher education sector in South Africa and across different regions in the world. It also points to private higher education as a dynamic environment that is responsive to change in the higher education sector and society at large.

It is clear that private higher education in South Africa has undergone a metamorphosis over the years and is continuously shifting in shape and size. It is evolving from education for the elite to education for the masses. In South Africa, it has developed over the years alongside public higher education despite government rhetoric of an integrated system. The private sector is nonetheless asserting itself as a force that refuses to be marginalised and is intent on making a significant impact on the system.

It is evident that quality assurance is conducted within a regulatory framework and both internal and external quality assurance processes are adopted. Westerheijden *et al.* (2007, p.1) consider the view that “quality is here to stay” a platitude since it has “never departed”, as evidenced by centuries of university existence in Europe.

Accreditation and (some form of) reaccreditation are employed by various countries to give legitimate status to the qualifications offered by higher education institutions. However, it is also evidenced in the literature that accreditation is for compliance and has a quality threshold. The quality assurance tools that are employed in South Africa and elsewhere in the world have been identified. This study serves to provide insight to the programme reaccreditation process in South Africa and insight to the “presence of institutional level QA” which is “less clear” in the SADC region (Hoosen et al, 2017, p.11). The literature reveals the constraints that might be encountered and how these could be navigated for compliance with external quality assurance measures.

Although quality assurance has been an existing field for a few decades at least, and there is extensive literature on the topic, there are knowledge gaps on its impact on higher education, such as how daily activities serve to shape the institution (Elken & Stensaker, 2018) or how, and the extent to which, external quality assurance impacts the quality of learning and teaching. Chu and Westerheijden (2018) allude to the difficulty in striking a balance between quality enhancement and accountability. The researcher would consider this an area that requires further exploration, particularly in South Africa where the CHE is seeking to strike this balance through the QAF (2021).

## CHAPTER 3

### CONCEPTUAL FRAMEWORK

#### 3.1 INTRODUCTION

The General System Theory is used as the basis for the conceptual framework of this study. This chapter will provide an overview of the Systems Approach and a discussion on the conceptual framework, which is the PHEI Open System Model.

#### 3.2 A THEORETICAL OR CONCEPTUAL FRAMEWORK

According to Larsen and Adu (2021, p.151), there are at least six roles that a theoretical or conceptual framework could play in a study. A framework could be a “connector, converter, decipherer, gap spotter, guide and/or standpoint” (*sic*). They advocate that a researcher should select at least three roles.

To take the ideas of the authors forward in the context of this study, the conceptual framework serves as a “connector”, whereby concepts are “operationalized”, in other words, to indicate their meaning or what they epitomise. The aim is to match the concepts to what is being studied. As a “converter”, the conceptual framework uses the concepts to “transform ideas or concrete information about the study”. Relevant codes and/or themes are developed through this process of conversion.

The conceptual framework as “standpoint” would mean using it as a lens to view the research from a specific point of view. The conceptual framework for this study essentially takes a Systems Approach to the quality management of programme reaccreditation within private higher education institutions. The concepts within the conceptual framework are explained in this chapter and it will become clear in the chapter on data analysis how the concepts have been operationalised to answer the research questions.

#### 3.3 A SYSTEMS APPROACH: OVERVIEW

Systems theory has its origin in cybernetics founded by Wiener and McCullouch and General System Theory founded by Von Bertalanffy (Barouch & Ponsignon, 2016). This study does not focus on any teachings from cybernetics and considers the idea of an “open system” found in General System Theory, which is a worldview introduced by Ludwig von Bertalanffy in 1968. Von Bertalanffy, an Austrian who spent most of his working life in the US and Canada, is considered the father of open

systems theory. He was a biologist and philosopher who, through his work, aimed to bridge the divide between the natural sciences and humanities which led to his theory of human personality as an active system

([https://link.springer.com/referenceworkentry/10.1007%2F978-3-319-49425-8\\_746](https://link.springer.com/referenceworkentry/10.1007%2F978-3-319-49425-8_746)).

In 2018, 50 years had passed since Von Bertalanffy first published *General System Theory* (Van Assche, Valentinov & Verschraegen, 2019). Von Bertalanffy built his theory on the “growing visibility of systems in the world” (Vanderstraeten, 2019). He co-founded the Society for General Systems Research which focused on the development and research of systems thinking (Van Assche *et al.*, 2019). His work centres around the “embeddedness of social processes” which enable the description of the “behaviour of complex, open systems as the result of an interaction between these systems and their environment” (Van Assche *et al.*, 2019).

Much criticism is levelled at Von Bertalanffy’s selfish nature for single-mindedly pursuing his ideas, belonging to the Nazi party for several years to advance his career, some of his ideas remaining ambiguous and underdeveloped, and the General System Theory not being a fully synthesized theory of social systems as it overlooks a key work by Alexander Bogdanov, namely *Tektology* (Van Assche *et al.*, 2019). Von Bertalanffy (1968, p.99) indicates, though, that his theory is a “working hypothesis” and that (at the time of producing the work) it was too early to consider the theory as “closed and definitive”.

General System Theory is based on the premise that there are systems everywhere, for instance in nature, science, business and organisations. A system comprises interdependent parts – parts that interact among themselves and with the environment (Von Bertalanffy, 1968, p.31).

The “Systems Approach” or “Systems Theory Approach” is used to examine the different parts of a system and then reconstruct it to gain an understanding of the coherent whole. According to Mele *et al.* (2010), there is a shift in attention from the parts to the whole within systems thinking. Mele *et al.* (2010:126) indicate that organisations are commonly viewed as systems to analyse their relationships with the environment. To gain a holistic picture of the system, it has to be viewed within the context of its internal and external milieu (Barouch & Ponsignon, 2016). The

open entity has a boundary that is permeable for the inputs and outputs that relate to, and are produced from, the whole (Mele *et al.*, 2010).

The Systems Approach has been applied to diverse disciplines and is classified as a systems science discipline. Systems science is where “the subject is systems, and the methodology is the systems approach to problems”. Systems science also includes other disciplines, namely systems engineering, cybernetics, operations research and systems analysis (Votruba, 1988). Although rooted in the sciences and mathematics, thematic elements can be distilled from Von Bertalanffy’s General System Theory. However, due to its root nature, the theory or Systems Approach cannot summarily be transplanted onto concepts (e.g. “organisation”) or fields (such as “education”). The significance of Bertalanffy’s work lies in considering it in an evolutionary sense in terms of “contemporary developments across a broad spectrum of disciplines” (Hammond, 2019). According to Hofkirchner (2019):

*“... reconstructing (Bertalanffy’s) general approach to systems provides us with several ideas on how to build a theory of social systems. The concept of social relations easily connects to Bertalanffy’s concept of relations of organization”.*

Considering the above idea of an evolutionary or adaptable theory, the theory cannot thus be “closed and definitive”. As the world evolves, it is presumed so too will systems evolve and thus a Systems Approach would need to be considered within a particular milieu. For example, the current restrictions brought about by COVID-19 lockdown levels have placed different challenges at the door of higher education institutions. Those that have programmes accredited in the contact mode of delivery had to resort to remote emergency teaching and learning and assessment. Even those who usually operate at a distance or online had to revise examination practices or practical sessions by replacing venue-based sessions with an alternative online approach. This entails rethinking practice, reviewing systems, or introducing new ones, upskilling staff, considering online learning models and different pedagogies (CHE, 2020). There had to be an adaptation to the “new normal”, a different approach to systems in place, such as greater utilisation of a learning management system. As higher education institutions need to be adaptive, their systems need to be as well. It is implausible that a dynamic environment, which is an

open system, could be associated with that which is “closed or fixed” in approach. At the time when the research proposal for this study was conceptualised, there was no thought of COVID-19 and how it would impact the world. Thus, the research design and interview schedule did not consider that. However, the responsiveness and adaptability of a higher education institution and its internal quality management system should be considered under any circumstances. The responsiveness to the external environment, particularly under emergency conditions such as a pandemic, could be indicative of the sustainability of the institution and its programmes. Restrictions were enforced by the government and institutions had to prepare a suitable response in terms of access to learning, student retention and success (CHE, 2020). The existing systems had to submit to government prescripts.

Ramosaj and Berisha (2014) indicate that General System Theory forms the basis for modern systems theory and has “an attribute of universality”. In thinking of the world as a system, and thinking of systems alongside systems or within systems, the Systems Approach has attracted criticism for “its technocratic and governmental ambitions”, and “attempt to understand and reshape the world according to the system image of the world” (Vanderstraeten, 2019) by wanting to enforce a particular worldview on society with an inherent “hierarchy, predictability, and control” (*sic*). Von Bertalanffy’s emphasis on the distinction between the system and environment alludes to a measure of unpredictability and uncontrollability.

There is truth in Vanderstraeten’s assertion that systems thinking is prevalent in government if one considers South Africa and its National Development Plan (NDP) 2030 (RSA, 2012) as an example. The NDP2030 aims to eradicate poverty and inequality by 2030. The NDP2030 contains several references to the transformation that is needed and measures to be implemented in the health system, transport system, education system, among others, and systems to be devised or strengthened, such as the justice system, to combat corruption and ensure accountability to achieve the NDP2030 goals. The government has identified that individual systems need to be (re)looked at for the whole system to function properly for it to achieve its goals. The de facto plan or strategy in place could circumvent aberrant behaviour by any government entity or derailment by any party in achieving the NDP2030 goals. Yet, one has to consider that plans can be impacted if there is not a systemic unified approach to achieving the goals. This lends a measure of



unpredictability or uncontrollability to the best-laid plans. Again, the example of the COVID-19 pandemic that upended the world, proved a reactionary response whereby plans had to be reviewed and systems revised to accommodate emergency arrangements.

Systems theory was introduced into the management field about three decades ago. At that time, it was “hailed as being a new way of analyzing and classifying management knowledge”, but there is nothing new about it today as contemporary management practices have included the basics for years (Ramosaj & Berisha, 2014). Systems theory is included in management and leadership studies whereby management contemplates coping with the complexity of the organisation and leadership considers coping with change (Ramosaj & Berisha, 2014). In light of the aforementioned, the system should therefore be adaptable and flexible in responding to new developments and open to receiving new information.

### **3.4 A SYSTEMS APPROACH IN THE CONTEXT OF THIS STUDY**

The Systems Approach is suitable for this study as it allows scrutiny of the different parts of an organisation while providing an opportunity to understand their interrelatedness and understand the whole. The relationship between the organisation and its environment can be explored. The private higher education institution may be impacted by internal and external interactions. It is presumed to be a dynamic or fluid environment as opposed to a closed, static one. If there is no interaction with the environment, the system is called a closed system. The opposite, an open system, is relevant to this study insofar as the elements or parts of a private higher education institution is in constant interaction internally and with the external environment. It is assumed that there is an exchange of information, people, matter, or energy among others.

The idea of an open system is endemic to a living organism, which is characterised by a continuous inflow and outflow, breaking down and building up of components through a “steady state” (“metabolism”) (Von Bertalanffy, 1968, p.39). Juxtaposing a living organism with a “living” organisation, the idea of a private higher education institution being an open system is appropriate given the inflow and outflow of information, resources, and so forth, thus a dynamic system, where “the flow of information corresponds to a flow of energy” (Von Bertalanffy, 1968, p.42).



According to Gartner and Naughton (1988), a system comprises all organisational aspects which include the employees, management, equipment, facilities, government, customers, suppliers, and shareholders, “fitted together with the aim of producing some type of output”. As man-made systems are inherently unstable, it requires managerial effort and activity to bring stability to the system (Gartner & Naughton, 1988). Barouch and Ponsignon (2016) indicate that all systems seek to achieve balance and that “homeostasis” is the system’s ability to maintain “functional balance” regardless of external constraints. There should be consistency for upholding quality (Cardoso *et al.*, 2016). This can be regarded as the need for a “steady state” in a private higher education institution to maintain a quality programme, and its “metabolism” could be the springboard for achieving and sustaining, and also improving, quality within a state of homeostasis.

The private higher education institution comprises interrelated parts (among other staffing, finances, and other resource inputs; infrastructure including facilities and ICT; policies and procedures/processes; administration; management processes or systems; governance). The parts can be deconstructed to be examined individually and with each other and, if reconstructed or reconstituted as a coherent whole, trends in behaviour can be identified for one to gain an understanding of the phenomenon. The “individual” (private higher education institution) will exhibit a type of behaviour, “action or change” which is related to the relationship with its environment and other individuals (Ramosaj & Berisha, 2014). As an open system, there will be “input” through the boundary, “throughput” (process and procedure) within the system and “output” (produced from the system, which could be a reaccredited programme for this study) (Ramosaj & Berisha, 2014). The private higher education institution must be “open” to “inputs” for it to be responsive to the environment.

Von Bertalanffy (1968, p.44) posits that both technological and living systems follow the “feedback scheme” which “presupposes structural arrangements”. Systems are governed by dynamic interactions of their parts or components, which through “fixed arrangements” and “conditions of constraint”, “... render the system and its parts more efficient” or to function machinelike (*sic*). If looked at from a Systems Theory point of view, the different parts of the “machine” could be isolated for their composition and function, but together they function steadily and in unison to

produce the required product, namely a reaccredited programme under consideration in this study. For this reaccreditation status to be sustainable, the institution needs to achieve a state of homeostasis.

Metaphorically speaking, a private higher education institution could thus be run like a machine, efficient and with reliable output, provided that its parts are “maintained” in a “steady state” and sync with each other. The supposition is that the different parts function well individually, but relate to, and interrelate with, other parts through input and feedback within processes and procedures to contribute to the overall well-organised entity or system and a balanced environment. However, it should be more than just a machine for production. Its dynamism, its open nature, provides for change or improvement of the output (product) if feedback is taken on board and processed appropriately and relevantly. This would demonstrate “adaptive behavior” (Von Bertalanffy, 1968, p.46). Ramosaj and Berisha (2014) posit that an open system should change to keep up with its dynamic environment.

If one considers the Quality Council and its new Quality Assurance Framework, there is recognition that a high-quality higher education system is necessary for the achievement of the NDP2030 goals (Saidi, 2021). The CHE indicates that higher education institutions need to pursue “deliberate and systematic strategies for the enhancement and improvement of quality” (CHE, 2021). There is the expectation of “adaptive behavior”, agility and responsiveness to the environment. The QAF adopts a system thinking approach that has at its core interdependencies and interrelatedness. Under the QAF, the CHE’s internal practices would need a Systems Approach and its external quality assurance measures have to be based on it as well. The CHE itself would then be considered an open system interacting with other open systems in the external quality assurance framework.

The existing Framework for Programme Accreditation (CHE, 2004a, p.9) stipulates that higher education programmes should be of acceptable quality and only those that meet the criteria for accreditation will be permitted to remain in the higher education system. The new QAF ties in with the existing Framework in that the responsibility for programme quality primarily resides with the higher education institution and that there should be internal systems and mechanisms in place to facilitate the achievement of a quality programme. Both the Framework and the QAF

seek to protect the student against a poor-quality programme of learning (CHE, 2004a; CHE, 2021). Thus, in this context, it is presumed that “input” and feedback would be taken on board, and the “throughput” process would ensure and assure programme quality. Taking into consideration the fact that the existing reaccreditation process will cease upon conclusion of the 2021 programme reaccreditation cycle and that institutional audits will deliver an outcome on the accreditation status of existing programmes for the next few years until the QAF is implemented, the standard and/or criterion for linking the programme to an internal quality assurance system should be carefully considered as an evaluative judgement on a programme that cannot summarily be passed based on the state of an internal quality management system (CHE, 2021b, 2021c).

Von Bertalanffy (1968, p.48) refers to the “optimum size” of an organisation and indicates that the larger the organisation grows, “the longer is the way of communication”. The question arises as to whether the chain of communication changes and, if new or revised communication protocols result due to revised structures and processes, how this affects the quality management process (“throughput”). Thus the state of an internal quality management system, from a system perspective, hinges on the interaction and interdependencies of all the parts within the context and climate of the whole organisation.

Von Bertalanffy (1968, pp.28-29) indicates that “there is an array of system models” and that certain “concepts, models and principles of general systems theory... are applicable broadly to material, psychological and sociocultural systems”. It is further indicated that “diverse system models will have to be applied according to the nature of the case and operational criteria” (*ibid*). According to Ramosaj and Berisha (2014), systems theory “provides a framework for the presentation and interpretation of phenomena and realities”. To link to the idea of the “universality” of systems theory, a “phenomenon for almost universal significance for all disciplines is that of the interaction of an ‘individual’ of some kind with its environment” (Ramosaj & Berisha, 2014). The ‘individual’ for the purpose of this study, at a micro-level, would be the “quality assurance actor” (the role-player/embedded role in the quality management system who does the “quality work”) who interacts or is inter-linked with other individuals in the internal environment, particularly in the “throughput” phase, or in the exchange with the external environment (e.g. through the inflow and/or outflow of

information). The ‘individual’ could also be the institution that interacts at macro-level with the external environment (e.g. local regulators or international associations).

Ramosaj and Berisha (2014) indicate that Von Bertalanffy’s systems theory crossed over to other disciplines “in the manner of general system theory” and, by the 1960s, was “fully adopted” by organisational theory. The notion of the organisation as a system was incorporated in the works of Katz and Kahn and Burke and Litwin in the form of open system models.

### 3.5 CONCEPTUAL FRAMEWORK: PHEI Open System Model

The Katz and Kahn Open System Model (input-throughput-output model) (Ramosaj & Berisha, 2014) will be adapted as a conceptual framework for this study:

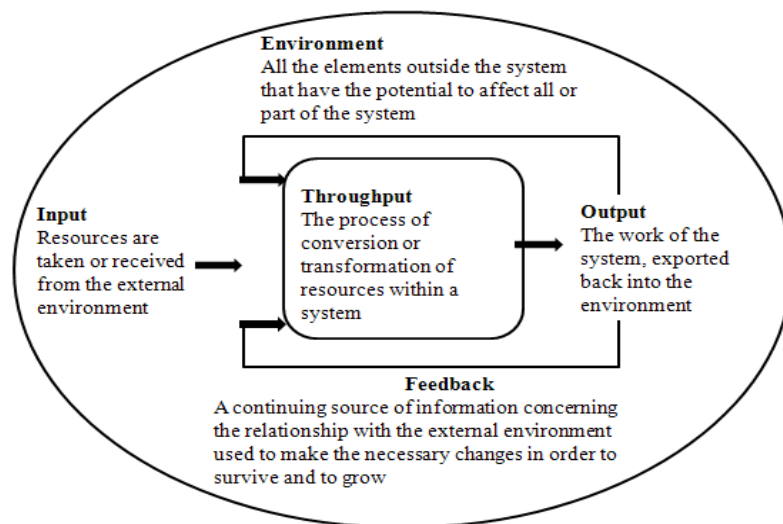


Figure 1: Katz and Kahn Open System Model

In the Katz and Kahn model, the “external environment is the input, individual and organizational performance is the output, while the throughput or the process according to general systems theory contains other organizational variables” (Ramosaj & Berisha, 2014).

Transplanting the Open System Model onto a private higher education institution produces the following model, named the PHEI Open System Model. The PHEI Open System Model serves as the contextual framework for this study. In the PHEI Open System Model, the private higher education institution is considered an open system.

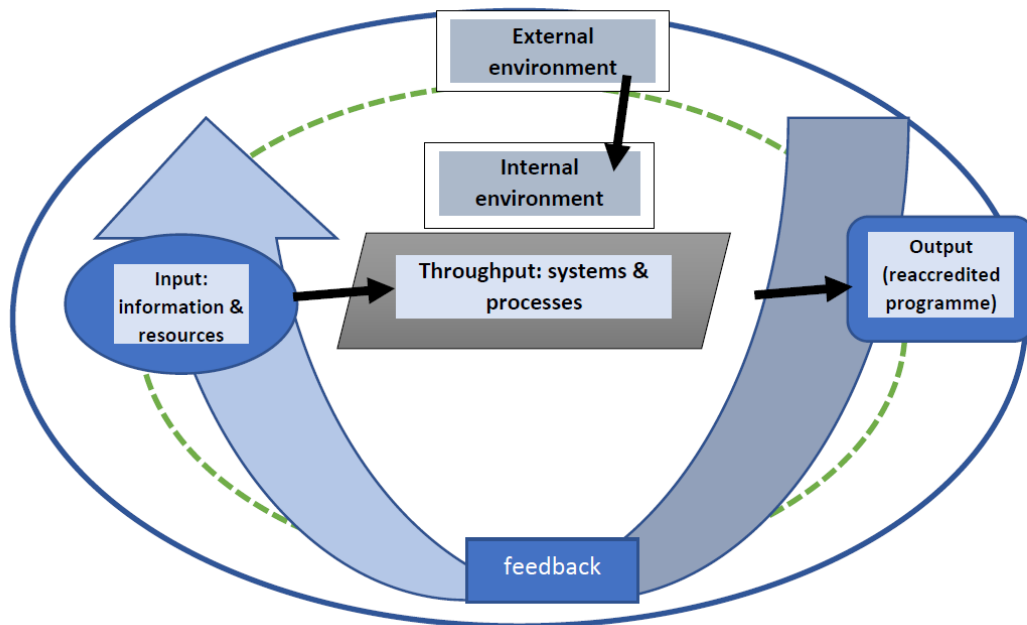


Figure 2: PHEI Open System Model

In the PHEI Open System Model, “input” would be the absorption of information and resources from the environment that is required for the institution to function, including human, financial, and material resources. The external environment would be the legislative and policy (regulatory), socio-economic, political, national (and regional and/or international) context within which the private higher education institution operates. It can also include external stakeholders, agencies, networks, and affiliations.

The internal environment would be the governance, management, operations, internal interactions, and dynamics. It is assumed that internal and external environments can also intersect (for instance, members of staff interacting with regulatory body representatives and the exchange of information to and from the institution). The institutional culture, values, and identities (organisational identity and role-player identity) resides within the internal environment but may manifest in the exchange with the external environment.

The “throughput” is the conversion (systems, processes, and procedures) of resources and feedback for teaching and learning, administration, daily operations, and management, including quality management.

The “product” would be the reaccredited programme. The “permeable boundary” allows the flow of information and resources (input) to the institution which could

affect the organisation in different ways. It can also be the “fence” through which the institution decides to permit interaction, input and/or feedback.

Feedback occurs internally and to, and from, the environment. Feedback from the environment is channelled back into an internal process, thereby closing the internal feedback loop (for review, development, and enhancement) because, within the reaccreditation process, programme review, surveys, student feedback and impact studies should be considered for programmatic development, sustainability, and improvement (CHE, 2004b, as amended).

In the “feedback scheme”, it is said that “A affects B which then has a feedback effect on A” (Barouch & Ponsignon, 2016). This could allude to the fact that the CHE (if “A”) also needs to close its feedback loop when it receives feedback from the private higher education institution (if “B”). It should be considered when and how this is done. If done, there is reciprocity of feedback within the quality assurance continuum.

The private higher education institution’s interaction with the CHE in terms of the feedback received through the reaccreditation process (for instance, conditions for reaccreditation or reasons for (notice of) withdrawal of accreditation) could affect the internal dynamics of the organisation and further review or development of the programme. In other words, input from the external environment will permeate the organisational boundary. The information has to be examined, analysed, and actioned for throughput so that the output can be produced, which in this case would be a reaccredited programme (in other words, a programme that meets the quality requirements for compliance).

The CHE anticipates that all higher education institutions will have quality management systems in place by the time the QAF (CHE, 2021) is implemented. An investigation of the internal quality management systems and processes will provide insight into the maturity of the institution to handle its quality assurance and whether it can enable and sustain not only compliance but also quality enhancement.

Von Bertalanffy indicates that if an object is a system, it must have certain general system characteristics. Thus, this study will consider the general characteristics of a quality management system.

The literature reveals the knowledge gap regarding the reaccreditation process followed by private higher education institutions, the constraints that might be encountered and how these “obstacles” could be navigated for compliance to be achieved. This study will therefore add value by providing insight to the private higher education sector and its quality assurance practices and how it specifically manages the reaccreditation process as initiated by the CHE to achieve a reaccredited programme.

### **3.6 CONCLUSION**

The conceptual framework was considered in the analysis of the data collected through interviews. The findings were interpreted in terms of the conceptual framework to answer the research questions. The conceptual framework was used to determine whether the private higher education institution is an open system that is responsive to the environment and, therefore, agile and adaptable in meeting requirements.

It is the researcher’s view that one needs to adopt a Systems Approach. Having a system implies order, coherence, a network of policies and interrelated practices for functionality or operations. Although there might be individual strengths within a system, the weaknesses are compensated, or risks mitigated, by the strengths of the collective. Interrelated and interdependent units allow for synergy and complementarity within the whole, which could perhaps enhance performance, and move away from insular and silo parts.

One could argue that reliance within an integrated or interdependent system could be detrimental to the optimal functioning of an organisation but, from a systems theory perspective, the counter-argument would be that there could be a disconnect if the parts of the whole do not interact and that, through integration, smooth functioning and efficiency can be gained. The machine would function properly. There cannot be an understanding of the whole if only the segregated parts are considered.



## CHAPTER 4

### METHODOLOGY AND METHODS

#### 4.1 INTRODUCTION

This chapter provides an overview of the epistemological and methodological paradigms, research design and ethical considerations for this study. The research methodology for this study will also be outlined. The research instrument, data collection and data analysis processes will be discussed. A discussion on the ethical considerations for this study is included.

#### 4.2 EPISTEMOLOGICAL PARADIGM

A qualitative approach was used for this study. A qualitative study is located in the interpretivist or constructivist paradigm, meaning that reality is socially constructed and there are multiple versions of reality dependent on the experience or viewpoint of the individual. This case study is based on data collected from different individuals based at different institutions, in stratified levels of position within the organisation, varying in race, gender, age, etc. The multiple viewpoints need to be examined from different angles, through different lenses as it were and analysed to construct a realistic view of programme reaccreditation as a quality assurance tool and how it is managed by the respective parties during a particular process.

This study explored the phenomenon of programme reaccreditation relevant to the private higher education sector and any constraints that might exist to prevent compliance with the accreditation criteria. The study explored the reasons why programmes might not meet the criteria for accreditation to be reaccredited, the challenges that private higher education institutions possibly face, how they might navigate and address the constraints to achieve compliance and sustain their efforts to ensure continued compliance and effect improvement where possible. The aim was also to identify the internal quality management processes and determine which mechanisms could be established or fortified to enable the sustainability and quality enhancement of a higher education programme. To this end, the knowledge and experience of staff members were drawn on for insight; in other words, the various personal accounts of the participants about the reality that existed at a specific place and point in time. The lecturers hold their version of reality (ontology) which may reflect commonalities.



Within a qualitative study, inductive reasoning takes place whereby the thematic organisation of data enables understanding of, and insight into, the phenomenon (Creswell, 2014:99 & 234). The methodological paradigm will be discussed further.

### **4.3 METHODOLOGICAL PARADIGM**

The interpretivist paradigm is suitable for this study due to the interconnectedness between interpretivism and qualitative methods (Thanh & Thahn, 2015).

Researchers who make use of the interpretivist paradigm and qualitative methods “often seek experiences, understandings and perceptions of individuals for their data to uncover reality rather than rely on numbers of statistics” (Thanh & Thanh, 2015).

The qualitative methodology for this study allowed the phenomenon to be studied in its natural setting thereby attempting to interpret it “in terms of the meanings people bring to them” (Creswell, 2007, p.36); in other words, the process of programme reaccreditation as applied within private higher education institutions by the relevant staff members. The research process (methodology) used in this study, i.e. the engagement of real, lived experiences by the participants, thus enables “how we know what we know” (epistemology) about the “nature of reality” (ontology) (Creswell, 2014, p.54).

### **4.4 RESEARCH DESIGN**

The research design, or procedure of enquiry, has the private higher education institution as the unit of analysis by identifying, through a set of semi-structured questions, the internal processes that are followed and internal quality assurance mechanisms at play to prepare for the programme reaccreditation process and see to its conclusion. This study which is bounded by “time and activity” can be considered a case study (Creswell, 2014, p.17 [page no. 43/342]) since there is a focus on a specific process at a certain place at a particular point in time. This case study focused on the quality management of programme reaccreditation as experienced by the participants.

#### **4.4.1 Research site**

The research site was initially intended to be the physical site of delivery for the private higher education institution (or the “natural setting”). However, due to COVID-19 lockdown restrictions and the consequent need to observe physical distancing measures, it was decided to conduct all interviews on a virtual platform, viz. Zoom.

The interviews with members of the DHET, CHE, SAQA and a private higher education association were also conducted on the Zoom virtual platform.

The participants logged on to the virtual platform either from home or work. All of them were thus in a familiar environment to allay any feelings of awkwardness and afford a measure of control over their circumstances. The interviews were conducted at a mutually agreed time depending on the participant's schedule. All the interviews were recorded with consent from the participants.

Initially, only three private higher education institutions would have been sampled, and thus those three sites visited. However, the need to expand the sample (as discussed in the following section) resulted in seven private higher education institutions being included as research sites. The two participants from the private higher education association logged on to Zoom from the private higher education institution (member) site (in Gauteng) and private dwelling (in the Western Cape), respectively, and not from the Association's office located in Gauteng.

#### **4.4.2 Selection of participants**

Sampling included a purposive sample of participants from private higher education institutions located only in Gauteng (or with one or more sites in Gauteng), staff members involved in the programme reaccreditation process at the CHE, staff involved in the registration process at the DHET and SAQA, and members of the association of private providers, of which only participants from one association were included based on their willingness to participate in the study.

The contact details of the private higher education institutions were found in the *Register of Private Higher Education Institutions* published by the DHET. The aim was to sift only registered institutions based in Gauteng. The study initially set out to include only three registered private higher education institutions with a minimum of three participants each, therefore, a total of nine participants. Only if all possible participants at private higher education institutions in Gauteng were unwilling to participate would invitation be extended to parties in other provinces, with the Western Cape being the first, to ensure completion of this study. Interviews were to be conducted with the first, and subsequent, willing party – in that order – to fulfil the sample size. The latter was fulfilled. However, during the sampling process, it was found necessary to extend the invitation to institutions that resided in more than one

province, including Gauteng. There was no need to move completely beyond Gauteng since follow-up requests managed to secure the desired number of participants from the province, although not from three institutions as planned.

Although the *Register* is updated regularly throughout the year, the initial sampling was done using the *Register* dated 5 October 2020 (which was last updated on 21 September 2020). Subsequent sampling was done using the same *Register* to ensure drawing from the same pool of participants in the Gauteng area. A formal letter of invitation to participate in semi-structured interviews was extended to the Head of the private higher education institution or contact person as indicated in the DHET Register.

The contact details of the DHET were found on their website ([www.dhet.gov.za](http://www.dhet.gov.za)), so too the required details on the website of SAQA (<https://www.saga.org.za/>), the Association of Private Providers of Education, Training and Development (APPETD; <https://www.appetd.org.za/>) and SAPHE (<https://www.saphe.ac.za/>). A formal invitation was extended to the Chief Executive Officer of SAQA, the Deputy-Director General (DDG) and Registrar for private higher education institutions at the DHET and Head of the private higher education associations, namely APPETD and SAPHE. The contact details for the CHE can be found on their website at <https://www.che.ac.za/>. As a staff member at the CHE, I directed the request to conduct interviews to the office of the Chief Executive Officer. In the case of the DHET, SAQA and CHE, the interview request was directed from the office of the person in charge to the relevant directorate.

SAQA was the first to respond. The intention was to interview a minimum of two members from SAQA to gain an understanding of the reregistration process on the NQF. Two participants provided consent thus this sample was filled. The CHE sample had to include a minimum of two participants. Three respondents were secured.

It was anticipated that a minimum of two members of the DHET, particularly those involved in the registration of private higher education institutions, would be interviewed to gain an understanding of their experiences of the regulatory environment, the current state of the private higher education sector and the relationship between the DHET and CHE regarding the reaccreditation and

registration processes. The number of respondents was not met as only one person was willing to be interviewed. The DHET required completion of a formal application to conduct research which was approved by the Deputy Director-General.

Although the first private higher education association that responded expressed willingness to participate, follow-up requests to set an interview date did not yield any results and that avenue was abandoned. The contact details of the other private higher education association did not lead to an immediate response, but when contact was established, two willing participants (from two different member institutions), which was the minimum requirement for the sample, were quick in providing consent and setting an interview date. One person serves on the Association's management structure, and the other is an ordinary member.

Regarding the private higher education institutions, it was anticipated that the sample of three registered institutions would provide a spread in terms of size, scope and subject fields, i.e., large institution (ten or more programme offerings), medium (between five and ten programme offerings) and small enterprise (between one and four programme offerings). The purpose was to interview institutional management and QA management staff and/or lecturers involved in the programme reaccreditation process. It was anticipated that at least three members of staff would be interviewed for their particular insight into, and experience of, the programme reaccreditation process. The size of the institution would determine whether there were designated people per category or if staff roles overlapped. This would indicate the quality management structure prevalent within an institution. The process was entirely dependent on the willingness of institutions to participate, staffing roles, staff size and willingness of staff. Since there was limited positive response in terms of the number of institutions and number of willing participants per institution, the sample size was expanded to include more institutions to satisfy the total number of nine participants.

The inclusion and exclusion criteria submitted during the ethics clearance application are as follows:

Private higher education institutions	CHE	SAQA	DHET	Private HE Association
Included: Executive Management/Management/Quality Management staff and/or lecturers Excluded: support staff (unless they serve on the above structures) No exclusions in terms of gender, age, race or ethnicity - any adult person employed by the institution who serves on the relevant structure and is available for, and capable of, the interview will be included.	Only members who handle the reaccreditation process of PHEIs will be interviewed. There will be no bias in terms of age, gender, race or ethnicity.	Only those members who are involved in the reregistration processes will be interviewed. No exclusions in terms of gender, age, race or ethnicity.	Only members who handle the registration of PHEIs will be interviewed, particularly those who know the CHE's reaccreditation process. There will be no bias in terms of age, gender, race or ethnicity.	Only staff that are at senior management level or assist PHEIs with quality management issues. [Note that the Association ordinary member participant provides support to other institutions when requested.]

As indicated above, the sampling of private higher education institutions proceeded on selection from the DHET *Register* of 5 October 2020. The *Register* indicated 98 registered institutions, i.e., that granted registration in terms of Section 54(1)(c) of the Higher Education Act that have fulfilled the requirements for registration. There were 34 provisionally registered institutions at the time; 24 that had their registration cancelled but could lodge an appeal within 60 days; 70 for which registration was cancelled or lapsed registration was in effect; ten institutions that had requested registration to be discontinued; and 93 illegal or “bogus” colleges which would be either an unregistered institution and/or one offering unregistered programme(s). In Gauteng, there were 46 registered institutions in October 2020. The sifting of “small”, “medium” and “large” institutions refers to sifting according to “PROVINCE” (column 5 of the *Register*) and in terms of the number of “QUALIFICATIONS” (column 6), not by name, sites of delivery or registration number. There were 12 large institutions, 13 medium-sized institutions, and 21 small institutions identified. At the outset, the medium-sized institution was deemed to be one with two to ten programmes and the smaller institution as having at least one programme. However, upon sifting, it became clear that all the medium-sized institutions had five to ten programmes and the small institutions had two to four programmes, with only two of 21 institutions that

only had one programme, thus the notion of size in terms of the number of programmes was revised. The large institutions had 11 programmes at minimum (one out of 12 institutions), two had 12 programmes, and the rest 14 or more, with the largest institution having 132 programmes offered. In several cases, programmes were being offered over different sites of delivery, across the Gauteng province or country. The largest institution has 26 sites of delivery. Since October 2020, several updated registers have been released by the DHET.

As per the *Register* of October 2020, the large institutions offered various programmes across different subject fields, including law, business, management and commerce, IT, travel and tourism and hospitality, theology, education, media and performing arts, and marketing. The medium-sized institutions offer marketing and communication, management, business, theology, art and design, among others. The smaller institutions concentrate on a particular field, or niche area, such as theology, nursing, hospitality, visual communication and design, business management, exercise science, fashion, and facilities management, among others.

Round 1 of the selection process included six institutions across small, medium and large, in anticipation of receiving a response from at least one and then setting up interviews. Two positive responses (one medium and one large) were received, following which interviews with the large institution materialised and no further word was received from the medium-sized institution despite several follow-up attempts. There were no responses from small institutions, even though invitations to smaller ones were sent during Round 2 of selection. Note that selection was also initially done based on commonality across institutions in terms of the subject field. The purpose was to determine whether programme reaccreditation had been achieved for the same type of programme and if there had been similar concerns identified in conditions that were set. However, this idea was not viable when it became apparent that there was a poor response to invitations to participate in the study and that securing any type of institution would suffice. It was a matter of selection per Round 1, Round 2 and Round 3 and so on thereafter, with a week or more interval after each round of selection while waiting on responses.

In retrospect, it could have been a time-saving measure if all institutions were invited at the same time, but it had the potential to pose a huge administrative challenge in

keeping track of all those at the same time. Therefore, it was considered feasible, and much more manageable, to send invitations in stages. It was better time management to secure interviews in the interim where positive responses were received from participants.

By early March 2021, three interviews had been secured with the large institution and there had been no positive response from a medium or small entity. Several institutions rejected the invitation.

The search was widened to institutions that had a base in Gauteng as well as the Western Cape. The reason behind focusing on Gauteng and the Western Cape was that if there was to be any travel (and accommodation) required during fieldwork, the expense would be lessened since the researcher resides in Gauteng and has private accommodation in the Western Cape. The study is self-funded, thus there were budgetary constraints. Although all fieldwork was conducted on Zoom and any party from any province could virtually be included, it was deemed necessary to adhere to the procedure as set out in the ethics application which had been approved (cf. ethics approval dated 23 October 2020). Extending the search to include the Western Cape led to securing three medium-sized institutions. At that time, two other institutions based in Gauteng also responded, which brought the total to four medium-sized and two large institutions. (Note that when the sample was drawn from the 5 October 2020 *Register*, the second “large” institution only offered eight programmes, which technically made it a “medium” institution. At the time of writing this chapter, the 30 June 2021 *Register* indicated that it had 11 programmes, which makes it a “large institution” in this study.)

A positive response was also received from two small institutions based in Gauteng, but interviews did not materialise. Towards the end of April 2021, a positive response was received from a small institution in Gauteng and the interview was secured for early May 2021. The sample of private higher education institutions, including nine participants across institutions, had eventually been filled.

The total number of institutions willing to participate in the study amounted to seven, with only one institution providing the minimum three participants required. The rest only provided one participant, although, in the case of two institutions, two or more staff members expressed willingness. Due to work pressure and unforeseen



circumstances, only one person from each of the two institutions participated. In the case of the other participants, they were either the sole willing parties or approved by the relevant institution. A few institutions had an internal approvals process for participating in research conducted by external parties which meant internal approval (or delegation) of the staff member who would participate; a few required the filling out of application forms (with supporting documents such as ethics clearance) by the principal researcher in this study. In two such instances, the application process was followed whereby one was approved and the other proved unsuccessful. In the case of the latter, the reason provided was that the “study will not be beneficent for (*the institution*) at this stage”. (Researcher’s insertion)

No lecturers from the sample private higher education institutions participated, only senior members of staff. The institutions will be referred to alphabetically (without bias): Institution A had three participants which included the Registrar (also the Head of QA), Dean of the Education Faculty (also QA Committee member), and the Reaccreditation and QA Coordinator (also former Provost) – two males and one female; Institution B had one male participant, viz. the Chief Executive Officer; Institution C had one female participant who is the Head of Academics; Institution D had one male participant who is the Dean of Programme Design; Institution E had a female participant who is the Managing Director (also Academic Director); Institution F had one female participant who is the Chief Academic Officer; Institution G had one male participant who currently serves as Dean but also previously occupied other roles in his long-term tenure at the institution.

Although the participants were given the assurance, in writing (cf. letter of invitation attached as Appendix A) and verbally upon interview, that their identity would be kept confidential and anonymous, a few were adamant that the institution should not be identified in any way, through any form of description, not even by referencing the subject field. The specific demand was due to programmes being in niche areas which only a few institutions offered. As one participant stated:

*“It’s very volatile in the private institutions, you know, where things can go wrong very easily. So I got permission, even from our executive management level, to have the interview with you but my identity as well as that of THE INSTITUTION must stay confidential; it may not be disclosed... Be careful*

also with the subject field ... be careful to not even mention that because that can even be traced back.”

The assurance was given to the participant, and thus the study will, as per ethical conduct and disclosure to all participants, keep all participants’ details confidential, and in the case of private higher education institutions, not reference any details on these, such as sites of delivery and programme subject field (cf. reference to POPI Act, 2013 further in this chapter). As per the *Register* of 30 June 2021, the institutions can be categorised as follows:

Table 1

SIZE	INST. A	INST. B	INST. C	INST. D	INST. E	INST. F	INST. G
Small		3 programmes					
Medium			7 programmes	7 programmes	10 Programmes *8 programmes as at 5 October 2020	10 programmes	
Large	20 programmes						11 programmes *8 programmes as at 5 October 2020

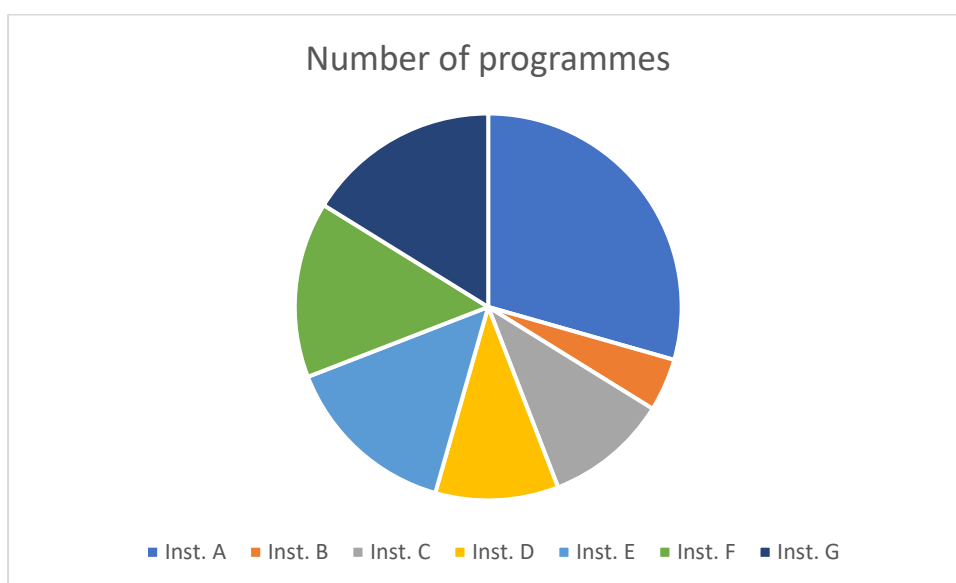


Figure 1

The above information indicates that, since sampling was done for this study, two institutions have added to their programme offerings as evident in the number of programmes taken from the 5 October 2020 and 30 June 2021 registers.

The qualification type on offer by each institution is outlined below (note that each qualification has a 1:1 relationship with a learning programme):

Table 2

Institution	Higher Certificate NQF Level 5	Advanced Certificate NQF Level 6	Diploma NQF Level 6	Bachelor Degree NQF Level 7	Advanced Diploma NQF Level 7	Post-graduate Certificate NQF Level 7	Bachelor Degree NQF Level 8	Post-graduate Diploma NQF Level 8	Bachelor Honours NQF Level 8
Inst. A	2			13		1	1	1	
Inst. B			1	1			1		
Inst. C	2	2	1		1				1
Inst. D	1			1				1	
Inst. E	3	4	2				1		
Inst. F	4		2	2	1				1
Inst. G	1	1	1	1		1	2	1	2
Total	13	7	7	18	2	2	5	3	4

The following can be noted from the above data:

- i. In total, 54 qualifications are offered at the undergraduate level (from NQF Level 5 to Bachelor Degree at NQF Level 8); eight qualifications are offered at postgraduate NQF Level 8. (Note: Only two out of seven institutions offer higher education at NQF Level 9 [Master] and one institution offers higher education at NQF Level 10 [Doctorate]).
- ii. Six out of seven institutions have the Higher Certificate as entry-level to higher education. The Higher Certificate is intended to provide access to higher education for students who did not receive matriculation endorsement for Diploma or Bachelor Degree study. This qualification is vocation-oriented, and a graduate would have achieved a basic level of higher education knowledge and competence applicable to the chosen field or occupation and ability to apply such in the workplace or an Advanced Certificate or Bachelor

Degree in a vertical articulation pathway (viz. upward mobility on the HEQSF) (CHE, 2013).

- iii. Five out of seven institutions provide Diploma programmes for students who received matriculation endorsement for Diploma study.
- iv. In terms of vertical articulation pathways on the HEQSF, five out of seven institutions provide internal articulation from undergraduate to postgraduate study. However, a solid progressive vertical articulation pathway is not provided for in all instances, for example:
  - Institution B offers a Bachelor Degree at NQF Level 7 but no postgraduate qualification at NQF Level 8 to secure specific vertical articulation.
  - Institution G offers a Diploma at NQF Level 6 but no Advanced Diploma at NQF Level 7 for natural progression.

The above leads to the consideration that if any or all of 54 undergraduate programmes were to be not reaccredited, there would be a substantial number of students enrolled on poor quality programmes which implies that they would not have the requisite knowledge, skills, or graduate attributes to enter the world of work or further study. The ramifications could be far-reaching in terms of not having an able, skilled workforce or postgraduate student body in various fields.

During fieldwork, it became clear that it was not a simple matter to classify institutions in terms of size. Although the small or medium-sized institutions offered considerably fewer programmes than the largest institution in this sample, they could have more sites of delivery (as can be seen in Table 3), or perhaps a bigger student population per programme, whereas the large institution could have a smaller intake on one of its programmes.

The institutions operate across the following number of physical sites and in the mode of delivery outlined below (DHET, 30 June 2021):

Table 3

Institution	INST. A (large)	INST. B (small)	INST. C (medium)	INST. D (medium)	INST. E (medium)	INST. F (medium)	INST. G (large)
No. of sites	2	3	5	1	8	5	4
No. of provinces where sites are located	1	2	4	1	5	3	3
Mode of delivery	Contact (face-to-face) and distance	Contact	Contact	Distance	Contact and distance	Contact and distance	Contact and distance

In all instances, the institutions indicated that there was parity in terms of resource provisioning across sites of delivery. The size of the site could vary depending on the number of programmes on offer per site of delivery. All institutions have been given a reprieve to offer contact learning programmes remotely due to restrictions brought about by the COVID-19 pandemic. According to the CHE (2020), “emergency remote teaching and learning refers to a mode of delivery through which contact and face-to-face delivery has been transferred to usually digital, remote platforms under emergency conditions”. The transference to digital platforms includes assessment and other activities and was instituted in 2020 with the advent of restrictions and is reviewed periodically while the pandemic continues to affect normal operations.

A few institutions have a strong industry focus which could lead to the awarding of bursaries by industry partners, as in the case of a medium-sized institution. One large institution is deeply rooted in a particular religious and cultural ethos, and the other has strong ties with the community due to the subject field of most of its programmes and the standing arrangement with professionals in the community to be guest speakers or part-time lecturers to provide insight into the nature, challenges, and benefits of the profession. In the case of each institution, there are firm relationships with alumni and other stakeholders, and it was indicated that these associations are drawn on to benefit the student – the programme is not taught in a

vacuum, but links are drawn to real-life scenarios and even a student exchange programme in the case of one with strong international ties.

Each institution has been in existence for at least ten years as can be seen below:

Table 4

Institution	Inst. A	Inst. B	Inst. C	Inst. D	Inst. E	Inst. F	Inst. G
No. of years in existence	10	22	40+	17	30+	30+	24

The institutions have established a higher education track record and demonstrate sustainability and longevity.

The participants' demographics are reflected below:

Table 5: PHEIs

Institution	Inst. A	Inst. B	Inst. C	Inst. D	Inst. E	Inst. F	Inst. G
Male	2W	1W		1W			1W
Female	1W		1W		1W	1W	

Table 6

Institution	SAQA	CHE	DHET	Private HE Association
Male	1W 1B			
Female		1B 1I 1W	1I	1I 1W

\*B = Black; I = Indian; W = White

Thus, seven males and ten females participated in the study with 12 white, three Indian and two black participants and, from observation, ranging in age from late 30s/early 40s to early/mid-60s.

#### 4.4.3 Research instrument

The research instrument was a set of questions designed for each participating group (cf. Annexure A). Excluding perfunctory questions for each group of participants, there was a set of 18 questions for the private higher education institutions, 12 questions for the CHE, 11 questions for the DHET, 11 questions posed to SAQA, and six questions for the private higher education association (totalling 13 questions if sub-questions are counted); the set of questions for the other association are unused.

The questions posed to the DHET, SAQA and CHE are from a regulatory point of view in terms of the process conducted within each institution. The questions designed for the private higher education institutions are from a provider point of view, as participants in a process for which compliance with accreditation and registration criteria is expected. The questions posed to the private higher education association are from a private higher education sector point of view, in terms of how these associates view the processes employed by the regulators.

The questions for each participating group (interview schedules) were mapped against the research questions to determine relevance and appropriateness.

Question mapping is outlined below.

##### SAQA questions:

<p><b>Main research question:</b> How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?</p>	<ol style="list-style-type: none"> <li>1. Describe SAQA's specific oversight role in the higher education sector.</li> <li>2. Describe the process of reaccreditation and reregistration between the DHET and the CHE and/or SAQA. What are the timeframes? Is it a parallel or linear process? Is there a financial cost attached to the process?</li> <li>3. What is the interval between reregistration cycles? What are the trends identifiable across the past three reregistration cycles, for instance? What are the current trends in the SA PHE sector?</li> <li>4. Explain the process that follows when a programme is not reaccredited and accreditation is withdrawn. How is this dealt with by the SAQA?</li> <li>5. Describe the process of deregistration.</li> <li>6. Are there "bad actors" (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the reaccreditation process be regarded as a useful process in terms of sifting the "good and bad" actors in the PHE sector and ensuring that only compliant institutions remain in the system?</li> <li>7. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are</li> </ol>
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	<p>processed within the expected timeframe for reregistration to occur? Are there any aspects of the process that could be improved? What would this process review achieve?</p> <p>8. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?</p> <p>9. A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and ‘protecting’ students against unscrupulous providers?</p> <p>10. Are you aware of any constraints that PHEIs might face which provide a challenge in terms of compliance?</p>
<p><b>Secondary research question no. 1:</b> How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?</p>	
<p><b>Secondary research question no. 2:</b> How does the PHEI navigate possible constraints to achieve the reaccreditation of a programme?</p>	
<p><b>Secondary research question no. 3:</b> Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?</p>	<p>11. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?</p>

**CHE questions:**

<p><b>Main research question:</b> How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?</p>	<p>1. How many reaccreditation cycles have the CHE engaged in to date?</p> <p>2. Describe the process for reaccreditation between the DHET, CHE and SAQA. What are the timeframes? Is it a parallel or linear process?</p> <p>3. Describe the CHE’s reaccreditation process. What would be the cost implication if an institution submits 20 reaccreditation applications, for instance? Is it a once-off fee per programme or are there associated costs?</p> <p>4. Explain the process that follows when a programme is not reaccredited or reaccredited with conditions. Is the institution permitted to continue offering a non-reaccredited programme? In the case of conditions to be met within a stipulated timeframe, how does the CHE verify that the issues have been addressed?</p> <p>5. What happens in the event that accreditation is withdrawn?</p> <p>7. Are there “bad actors” (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the</p>
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	<p>reaccreditation process be regarded as a useful process in terms of sifting the 'good and bad actors' in the PHE sector?</p> <p>8. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are processed within the expected timeframe? Are there any aspects of the process that could be improved? What would this process review achieve?</p> <p>9. A recent study (by Stander and Herman; 2017) found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be "less regulatory"? What would be the implications for compliance and accountability, and "protecting" students against unscrupulous providers?</p> <p>10. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?</p>
<p><b>Secondary research question no. 1:</b> How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?</p>	
<p><b>Secondary research question no. 2:</b> How does the PHEI navigate possible constraints to achieve the reaccreditation of a programme?</p>	<p>6. How can the CHE assist PHEIs in terms of any identified developmental needs?</p>
<p><b>Secondary research question no. 3:</b> Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?</p>	<p>11. Can the external QA process be improved? What would be the benefits?</p> <p>12. In your opinion, what accounts for some PHEIs being able to achieve compliance while programme accreditation is withdrawn for others?</p>

**DHET questions:**

<p><b>Main research question:</b> How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?</p>	<p>1. How many reregistration cycles have the DHET engaged in to date?</p> <p>2. Describe the process of reaccreditation and reregistration between the DHET and the CHE and/or SAQA. What are the timeframes? Is it a parallel or linear process? Is there a financial cost attached to the process?</p> <p>3. What is the interval between reregistration cycles? What are the trends identifiable across the past three reregistration cycles, for instance? What are the current trends in the SA PHE sector?</p> <p>4. Explain the process that follows when a programme is not reaccredited and accreditation is withdrawn. Is this action by the CHE met with any objection or resistance from the institution? How is this dealt with by the DHET?</p> <p>5. Describe the process of deregistration.</p>
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	<p>6. Are there “bad actors” (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the reaccreditation process be regarded as a useful process in terms of sifting the “good and bad” actors in the PHE sector?</p> <p>9. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?</p> <p>10. A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and “protecting” students against unscrupulous providers?</p>
<p><b>Secondary research question no. 1:</b> How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?</p>	
<p><b>Secondary research question no. 2:</b> How does the PHEI navigate possible constraints to achieve the reaccreditation of a programme?</p>	<p>7. How can the DHET assist PHEIs in terms of any identified developmental needs?</p> <p>8. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are processed within the expected timeframe for reregistration to occur? Are there any aspects of the process that could be improved? What would this process review achieve?</p>
<p><b>Secondary research question no. 3:</b> Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?</p>	<p>11. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?</p>

**PHEI questions:**

<p><b>Main research question:</b> How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?</p>	<p>6. How many reaccreditation cycles has the institution participated in to date?</p> <p>17. Do you think that PHEIs are over-regulated? Is there an alternative?</p> <p>18. What is your opinion on the issue of trust in the PHE sector (i.e. in the quality of PHE programmes and the quality of service) considering that it is viewed as having a profit motive (rather than academic motive)? Is there trust between the PHEIs and the regulatory bodies?</p>
<p><b>Secondary research question no. 1:</b> How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?</p>	<p>1. Provide an overview of the governance and management structures of the institution.</p> <p>2. How many programmes are offered by the institution? How do these align with the Vision and Mission of the institution?</p> <p>3. Which quality management structures are in place at the institution to attend to the internal and external quality assurance processes at programme and institutional level?</p>

	<p>4. How many full-time and part-time academic staff are employed? What role do staff play in programme design, programme review and quality management processes?</p> <p>5. Provide an overview of the budget and provision of resources for each programme and whether the relevant infrastructure and facilities are available for offering of the programme. Is there parity in terms of budgeting and resource provisioning across programmes per site and across sites of delivery?</p> <p>9. How many programmes were submitted for evaluation during the last reaccreditation cycle? What was the outcome of the process?</p>
<p><b>Secondary research question no. 2:</b> How does the PHEI navigate possible constraints to achieve the reaccreditation of a programme?</p>	<p>10. Are there any structural or systemic constraints that prevent the Institution from achieving and/or sustaining compliance with the regulatory bodies?</p> <p>11. How are these constraints navigated to achieve compliance?</p> <p>12. Was there reflection and review of the reaccreditation process once completed? What was the experience of the institution and feedback from the institutional role-players?</p>
<p><b>Secondary research question no. 3:</b> Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?</p>	<p>7. Describe the process from a) reaccreditation of a programme by the Council on Higher Education to b) reregistration of the institution with the Department of Higher Education and Training. Describe the nature of engagement with the CHE, DHET and/or the South African Qualifications Authority and how the requirements of the regulatory 'triad' impact organisational management, quality management and quality culture. Is there a cost implication attached to the reaccreditation/reregistration process?</p> <p>8. Describe the internal procedure followed in preparing for submission of reaccreditation applications to the CHE. Name the role-players and their responsibilities. Also refer to the programme review process.</p> <p>13. Does feedback from the CHE/DHET and/or SAQA feed into any programme review or quality management process for the purpose of quality enhancement or development?</p> <p>14. Which other forms of feedback (from students, industry, and other stakeholders) might be channelled back into a review process? What is the purpose thereof and at which intervals do these occur?</p> <p>15. Is it anticipated that the programmes currently on offer could be sustained in the long term? Which socio-economic, political, or other factors would impact programme longevity? What would be the academic and financial impact if a programme offering becomes unsustainable?</p> <p>16. Which measures can be put in place internally or by the CHE to better facilitate or strengthen the reaccreditation and quality management processes?</p>

**Private Higher Education Association questions:**

<p><b>Main research question:</b> How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?</p>	<p>4.7 A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be "less regulatory"? What would be the</p>
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	<p>implications for compliance and accountability, and “protecting” students against possible unscrupulous providers?</p> <p>6. What could be done to enable compliance, capacity building, better relationships between stakeholders (if needed), or engender trust in the HE system?</p>
<p><b>Secondary research question no. 1:</b> How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?</p>	
<p><b>Secondary research question no. 2:</b> How does the PHEI navigate possible constraints to achieve the reaccreditation of a programme?</p>	<p>4.3 Is there a need for capacity building in PHE?</p> <p>4.4 Have you provided assistance or capacity development with regard to the reaccreditation process that PHEIs have to undergo on a cyclical basis? Describe your involvement.</p> <p>4.5 What kind of support network is there to ensure ‘alignment’ with regulatory authorities?</p> <p>4.6 Are there barriers encountered by PHEIs to achieve “alignment”/compliance?</p>
<p><b>Secondary research question no. 3:</b> Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?</p>	<p>5. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?</p> <p>6. What could be done to enable compliance, capacity building, better relationships between stakeholders (if needed), or engender trust in the HE system?</p>

The second and third secondary research questions pertain to private higher education institutions specifically, therefore, the questions for SAQA could not be mapped against those. Similarly, the questions for the CHE, DHET and private higher education association could not be mapped against the first secondary research question.

#### 4.4.4 Data collection methods and data documentation

The primary means of data collection was one-on-one semi-structured interviews. Interviews were conducted on a first-come-first-serve basis. The first two interviews were conducted with SAQA, with the private higher education association second interview being the last, totalling 17 interviews. There was usually one interview scheduled per day, except on 5 and 6 May 2021 when two interviews were scheduled per day, one in the morning and one in the afternoon.

The interviews were conducted on the virtual Zoom platform (<https://zoom.us/>). Once the interview date and time was confirmed, a meeting link was sent to the participant via email. The interview was recorded. The recording was received via a link sent from the Zoom platform. The recording (which included a video and audio recording) was downloaded and saved under each institution's name (A-G). The recording was

transcribed, and the transcription was saved as “Transcript\_1” and so forth in the same folder as each video and audio recording. Each transcription was sent to the relevant participant for member checking. The edits were incorporated, and the document was uploaded on Atlas.ti9 for data organisation and coding. The Atlas.ti9 software was obtained from the IT support service at UP. A software download and password was required.

The interviews lasted an hour on average, with a few concluded in under, and others just over, an hour. The longest session lasted approximately an hour and a half. The candidates were all open and very engaging. The open-ended questions elicited a lengthy narrative in most cases. Overall, rich thick data was elicited due to good rapport being established between researcher and participant.

The participants were requested to share documents for perusal and analysis provided these were in the public domain. Two private higher education institutions provided documentation that could be used for document analysis. However, since the information is confidential, these will not be attached. The DHET provided the *2019 Annual Report on the Compliance of Private Higher Education Institutions with the Regulations 2 April 2020 No. 2*. The Institutional Audits Directorate of the CHE extended an invitation to act as an observer in the researcher’s capacity as a student at one of their workshops with the Institutional Audits Reference Group. The Reference Group was in the process of conceptualising guidelines for the institutional audit of private higher education institutions to commence in 2022. The guidelines will be supplementary to the *Framework for Institutional Audits 2021* and the *Manual for Institutional Audits 2021*. Both the Framework and Manual (CHE, March 2021) were provided. The institutional audits will lead to an outcome on programme (or qualification) reaccreditation as of 2022. Thus, the current process of evaluation applicable to all programmes serving for reaccreditation (until the end of 2021) will no longer be followed.

#### **4.4.5 Data analysis and interpretation**

The Atlas.ti9 software was used for data organisation, coding and thematic grouping. Analysis was done according to the conceptual framework, viz. the PHEI Open System Model (as discussed in Chapter 3). Links were drawn with the literature reviewed for this study.



The transcriptions were uploaded on Atlas.ti9 and the data segments were looked at individually for coding to be done. The different codes emerged as the data was worked through, for example PHE association aims, PHE current state, “bad actors”, barriers, challenges, capacity building, constraints, improvements, IQA – new QAF, IQM, planning, legislation, profit imperative, quality culture, reaccreditation, reflexive practice, regulation, resources, revised structure for IQA, quality work, risk, staffing, sustainability, and so forth. Some data segments had more than one code assigned. The different codes were grouped together thematically. Some *in vivo* codes were singled out. Atlas.ti9 generated reports per code to facilitate this process.

#### **4.5 DATA VALIDATION**

The qualitative research analyst uses different lenses or viewpoints when evaluating the data and this multi-lens approach serves to establish validity (Creswell & Miller, 2000). For instance, the researcher’s lens is used to determine whether “the data are saturated to establish good themes or categories” (Creswell & Miller, 2000). Another lens would be that of the participant. Within the interpretivist or constructivist paradigm, the reality is socially constructed, and thus each participant holds his/her version of that reality or truth. The reality filters through in responses to open-ended questions which are interpretive and contextualised perspectives of reality, in other words, cognisant of place and situation (Creswell & Miller, 2000). The researcher’s task is to accurately represent that reality for empirical data to be reported. It is, therefore, the researcher’s responsibility – as principal researcher for this study – to adhere to the procedure and process for an audit trail to serve as verification.

In this study, a methodological relationship can be identified between the “research purposes, questions and processes” (Cho & Trent, 2006) which lends credence to the cogency and credibility of the data. Cho and Trent (2006) refer to “transactional validity” which is defined as “an interactive process between the researcher, the researched, and the collected data” to achieve a “relatively higher level of accuracy” which, in this study, was achieved in part through member checking and identifying recursive data.

The confirmability, dependability and reliability of the data were established through the application of the measures outlined below.



#### **4.5.1 Reflexive practice**

In this study, “validity-as-reflexive-accounting” (Creswell & Miller, 2000) was employed. This is the practice of returning to the data constantly – a lens that was used throughout the writing process to ensure correct constructs, sensible explanations and interpretation.

#### **4.5.2 Member checking**

The transcriptions were checked by all participants and where editing was done, those edits were accepted before uploading on Atlasti.9 for coding and thematic organisation. The participants thus confirmed the “credibility of the information and narrative account” (Creswell & Miller, 2000). The participant’s lens was the means of establishing the validity of the data. They had the opportunity to confirm that the researcher presented their reality accurately. Consensus, trustworthiness and confirmability of data were built into the data validation process. In the case of member checking, data validation was thus a shared responsibility and an interactive process between the researcher and participant (Cho & Trent, 2006). Some researchers would consider this method of data validation as “the most crucial technique for establishing credibility” (Cho & Trent, 2006).

#### **4.5.3 Audit trail**

There is an audit trail for this study. The data collection process was documented in a journal, from commencing with sampling and invitations for the interview until the last member check. An Excel spreadsheet was kept, recording all interview details. Reflection on each interview was done and recorded. All data have been stored securely. Once the study is completed, the data will be stored on the University’s repository and the flash drive containing transcriptions and documents will be submitted as well. The data will be shared in the thesis and peer-reviewed articles.

#### **4.5.4 Peer debriefing**

Peer debriefing sessions were held with the Supervisor, via email and in meetings on a virtual platform. The feedback received from the Supervisor was incorporated. The Supervisor was regularly updated on the progress of the study, challenges that were experienced, and any other issues that arose. Peer debriefing through regular review, questioning and feedback add to the credibility of the research process (Mertens, 2009: 195). A presentation of the study was done at a “Quality

Conversations” webinar held by the CHE on 11 June 2021 where peers interrogated the study.

#### **4.5.5 Disconfirming evidence**

This is a process whereby the researcher is alert to negative or disconfirming evidence. One first establishes the themes of the study and then searches the data for evidence which either confirms or disconfirms the theme (Creswell & Miller, 2000). During data collection, participants were asked for their views on recurrent matters that had come to light in other interview sessions. For example, one participant from a private higher education institution believed SAPHE could play a more formal role in the quality assurance process. This view was shared by another participant, to some extent. However, when this notion was raised with the private higher education association member participants, they both discounted it as a viable idea.

#### **4.5.6 Document analysis**

A few participants shared documents for analysis. However, as stated earlier, these are confidential and may not be shared. The contents were analysed and considered for relevance. The DHET’s *Register of Private Higher Education Institutions* for the period 5 October 2020 until 13 September 2021 is attached as Appendix D. The websites of the institutions cannot be disclosed due to the confidentiality and anonymity of participants. Other relevant documents that are in the public domain are attached, such as the QAF (CHE, 2021).

#### **4.5.7 Data triangulation**

Triangulation is a means of verification by consulting different data sources (Cho & Trent, 2006). Triangulation is a means to establish “convergence, corroboration, or correspondence of results” (Mertens, 2009:309). It serves to establish the accuracy of the data. Data triangulation will encompass interview transcriptions, document analysis (those provided by the participants and sourced from the relevant websites, e.g. the DHET *Register*), and the research diary which will include observations. The details of the research design will be included in the thesis for credibility to be established by the reader (Creswell, 2014).

#### 4.6 RESEARCH ETHICS

The confidentiality and anonymity of participants will be preserved at all times. This was the assurance given to participants, both verbally in the interview and in writing, and a prerequisite for ethics clearance. To follow protocol, data collection commenced only once ethical clearance was received from the ethics committee. Formal letters of request were issued to all prospective participants via the proper channels. A further request was made (when permission was granted by the institution) to circulate the invitation to staff via the internal communications platform and for staff who were interested (and served on the relevant structures) to contact the researcher via email address (which was provided in the letter). Further engagement was with the individual to retain confidentiality and anonymity and prevent a captive audience. The individual had to participate voluntarily. Participants provided written consent to participate in the interviews and were assured of voluntary exit at any point without reprisal. There was full disclosure upfront on the scope and purpose of the research to allay concerns that conflict of interest might exist and for transparency.

The interview site and participant boundaries were respected (Creswell, 2014). There is adherence to the University's guidelines for ethical research (S4083/00 (amended)) which encompasses professional and ethical conduct by the researcher and protection of intellectual property (Singh & Stükelberger, 2017). The data has not been, and will not be, misused, misrepresented, or falsified (Creswell, 2014). Data that is "excerpted from field notes or interviews" can assist with the "confirmability" of the data which means that it was not fabricated or a biased view (Mertens, 2009:196).

The findings will serve to inform a response to the research questions and any recommendations that can be made. The data will be included in the thesis, which will be disseminated to examiners and moderators at UP. An article(s) will be derived from the thesis for submission to a peer-reviewed journal. Academic language has been used as appropriate to the academic pursuit and publication.

## 4.7 LIMITATIONS AND DELIMITATIONS OF THE STUDY

Due to personal interaction with participants, the study is rich in data, yet the case study limits the investigation. This case study is an isolated observation or examination and focuses on the individual's experience at the exclusion of others.

The study is limited to seven private higher education institutions and only nine respondents from these institutions, all of whom are positioned at senior or top management level; therefore, the perspective of lecturers has not been included. The availability of participants determined the diversity and the total number of respondents for the study.

The study focused on institutions that are predominantly located in Gauteng thus, due to its scope and size, the findings from this compact study cannot be generalised. The size and scope of this study limit further exploration as the data sample should be manageable and the study itself should be manageable within the allowable timeframe for completion. If there are links to broader issues, these need to be looked at to determine whether the findings could be transferable or lead to "enhancement of practice" (Briggs *et al.*, 2012).

### 4.7.1 Challenges

Several factors had an impact on the progress of the study when doing sampling. Many staff members were working remotely from home and perhaps only one person monitored the central email address of the institution as provided in the *Register* or on the relevant website. That person had to pass the request to management and once approved, disseminate the request to staff who, in turn, had to make contact in their individual capacity.

There was a waiting period in anticipation that someone would be willing to establish contact. Where contact details were provided by management, with relevant staff copied in the email, individual formal letters were issued to parties separately. However, a waiting period would ensue nonetheless as it was still the invitee's prerogative to participate. The study would not benefit from a captive audience and, therefore, even though some members indicated a willingness, there was no coercion through insistence on a meeting date.

Some members had to postpone their interview date and one cancelled unexpectedly on the scheduled date. Despite the indication to reschedule, this did

not transpire, which resulted in having to find another participant to fill the gap. Work pressure, or unexpected developments at work, was cited as a reason for the postponement. Since all participants were senior members of their respective institutions, they had to attend to several administrative and managerial duties, of which the load was presumably compounded by challenges brought about by COVID-19 lockdown restrictions.

The virtual interview presented challenges at times, such as a few occasions where internet connectivity was momentarily lost. The sessions resumed when connectivity was restored. The experience was that the virtual platform could detract from the “warmth” of a personal encounter which might negatively influence the session if the researcher does not have good interpersonal skills to facilitate an engaging session. It might also afford some measure of “distance” making participants more comfortable to share freely. It depends on the person, the rapport that is established and quality of the interaction. The researcher tried to create an engaging “atmosphere” in a virtual setting.

It was anticipated that six months would be sufficient time in the field for data collection. However, the timeframe was lengthened to seven months due to the waiting period for responses (both for approval from the institution and willing participants to make contact), postponement of interviews, the challenge with finding private higher education institutions that were willing to participate, the challenge with establishing contact and securing interviews with members of the private sector association(s), and the DHET. Perhaps the DHET and other stakeholders should consider making the research application process to be followed by external parties explicit on their websites, and making the relevant application forms available, as a time-saving and user-friendly approach.

The reasons for the reluctance from private higher education institutions are not clear since this was a good opportunity for stakeholders to express their views on the programme reaccreditation process and provide suggestions for improvement. As indicated, 2021 is the last year in which the current programme reaccreditation process will be conducted, making way for institutional audits in 2022. This was an opportune moment to reflect on positive and negative aspects of the current process which could be considered in the revised process going forward. This study was

conducted on the cusp of the transition period, not only regarding the transfer of the “programme reaccreditation” function from one CHE directorate to another but also in terms of transition to the new Quality Assurance Framework of the CHE (CHE, 2021) that will be implemented in 2024. Currently, in this interim or planning phase, the CHE is in the process of reviewing all its functions, processes, and procedures towards 2024 QAF implementation.

Access to documents is another challenge as information is the intellectual property of the institution and may not be freely shared, particularly if the participant is not the authorising person of the institution. Although a few participants were very generous in sharing, based on a position of trust that the researcher will work discreetly with the documentation, the majority did not respond to the request. One can only surmise how access to information will become more challenging with the Protection of Personal Information Act (POPIA) (Act No.4 of 2013) that has come into effect from 1 July 2021. The privacy law protects the privacy of the individual and any “juristic person” (such as a private higher education institution or the CHE). In terms of the POPIA, the term “personal information” means any information relating to “an identifiable, living, natural person and where it is applicable, an identifiable, existing juristic person” that includes *inter alia* “any identifying number, symbol, e-mail address, physical address, telephone number, location information, online identifier, or other particular assignment to the person”. This study is thus restricted in its description of participating institutions.

As a part-time PhD student and in full-time employment, the bureaucratic process cuts into one’s time, and plans are often derailed due to unexpected red tape. Several milestones for this study were missed due to timeframes being shifted as a result of spending more time in the field than anticipated. The pressure of finalising the study and submitting it by the deadline for examination was constant since any delay would lead to a greater financial outlay.

#### **4.7.2 Risks**

The risks identified for this study are as follows:

RISK	MITIGATION OF RISK
<p>The risk that private higher education institutions can perceive a conflict of interest as the researcher is employed by the CHE.</p>	<p>i. The researcher funded the study herself and therefore there is no obligation towards her employer and no possible dispute regarding intellectual property.</p> <p>ii. The researcher declared her employment status in the formal letter of invitation to participants for transparency and declared that she did not work in the reaccreditation sub-directorate.</p> <p>iii. No statistical data was requested from the CHE or DHET to prevent PHEIs from possibly viewing this in a negative light as their data, in any form, may not be shared with third parties unless it is available for public consumption.</p>
<p>Financial and time constraints</p>	<p>Reduced risk by confining the study to the Gauteng area. This was supposed to be done in consideration of the researcher's budget and to limit travel during COVID-19. However, travel was not necessary as all interviews were conducted online since lockdown level restrictions limited physical social interaction. Time constraints still posed a risk due to the challenge in securing suitable willing participants.</p>
<p>COVID-19 social distancing and national state of emergency measures</p>	<p>The risk was reduced through virtual engagement with participants on an agreed-upon virtual platform, viz. Zoom.</p>
<p>Environmental and health risk</p>	<p>To reduce carbon footprint, the study was conducted as a paperless exercise as far as possible. There was no travelling to participant sites due to COVID-19 lockdown restrictions on social interaction.</p>
<p>Psychological risk</p>	<p>The participants were not coerced nor a captive audience. The participant needed to participate voluntarily with the understanding that there could be an exit at any time without fear of reprisal.</p>
<p>Limitations during the data collection process and the risk of not securing the required number</p>	<p>The search was expanded to include more PHEIs. The search was also expanded to</p>



of participants (a delimitation was that only one province has been selected as a research site)	include institutions in the Western Cape and those located in both Gauteng and the Western Cape.
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#### **4.8 CONCLUSION**

The paradigmatic views and methodological processes were explained in this chapter. The data collection process proved to be challenging but continuous follow-up and invitations to several parties secured the number of required semi-structured interviews. The process required perseverance and constant review. A good rapport with the participants was established which allowed for rich, thick data collection. The participants were assured of confidentiality which built confidence in the process and allowed participants to relate their experiences freely.

## CHAPTER 5

### DATA AND FINDINGS

#### 5.1 INTRODUCTION

In this chapter and the next, the qualitative data collected through fieldwork conducted for this study will be discussed and analysed. The research purpose, research questions and PHEI Open System Model conceptual framework were used as a guide during data coding, organising and analysis to ensure that links could be drawn and that the focus remained on the scope of the study. Data was coded and organised using the Atlas.ti9 qualitative data analysis software. The coded data were organised according to the following themes that emerged during the process.

THEMES
<ul style="list-style-type: none"><li>▪ Need for a regulatory framework</li><li>▪ Criticism of the regulatory framework</li><li>▪ Regulatory processes</li><li>▪ Relationship with regulators</li><li>▪ Barriers to compliance</li><li>▪ Constraints and challenges experienced by PHEIs</li><li>▪ Navigation of barriers or constraints</li><li>▪ Internal quality management</li><li>▪ Programme reaccreditation process</li><li>▪ Current state of PHE</li><li>▪ Sustainability of PHEIs</li><li>▪ Capacity building</li><li>▪ PHE association</li><li>▪ The new QAF</li><li>▪ Suggestions for improvement<sup>54</sup></li><li>▪ PHE as Open System</li><li>▪ Quality enhancement</li></ul>

The thematic data have been organised according to the focus areas outlined in the research questions and literature review. The themes are not necessarily presented individually in this, and the next, chapter but as integrated themes under relevant sections.

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<sup>54</sup> Some suggestions for improvement are discussed in the next chapter.

The participants were assured of confidentiality at all times. Therefore, detailed descriptions of the institutions and their programmes will not be provided, for instance, programme offerings, information on sites of delivery, background and so forth lest it is possible to trace these to a specific institution.

As indicated previously, two private higher education institutions supplied documents for analysis. One of the institutions provided a list of its registered programmes. The data was used for verification purposes and included in the PHEI (*n*) overview provided in Chapter 6.

The second institution provided eight documents for analysis. As these provide details of the institution that reflect the field(s) in which it operates, specific references will not be made. The data relates to the institution's internal quality management system. The data were analysed and incorporated in the description of the internal quality management system at PHEI (*nn*).

The confidentiality of participants and integrity and ethical obligations of this study are thus preserved. The individual participants from private higher education institutions have been assigned a pseudonym to protect their identity and the institution will be referred to by number ("PHEI1-7"). The representatives from the CHE, SAQA, DHET and private higher education association will remain anonymous as "CHE Participant 1/2/3", "DHET participant", "SAQA participant" and "PHE association participant".

## **5.2 REGULATION OF THE PRIVATE HIGHER EDUCATION SECTOR**

The participants are in accordance that regulation of the private higher education sector is necessary. Alex (PHEI7) indicates that there are too many "fly-by-nights" which necessitate regulation to protect the "vulnerable student population". The participant posits that, to date, the sector has been more "survival-based" than "growth-based". The participant posits this has had an impact on the quality of private higher education:

*"I think the economic realities of private higher education, as such, is that it's very difficult to actually survive in this space, particularly with no government subsidy. Therefore, in the interest of survival, quality has taken a bit of a backseat."*

It is anticipated that institutional audits will serve to rectify the situation as it moves the institutions away from the current “reaccreditation mindset” to an “institutional audit mindset”, that is, from the programme as a unit of analysis to the institution as the primary unit of analysis. The empirical evidence<sup>55</sup> indicates that participant institutions have a sharper focus on internal quality management systems and processes in light of upcoming institutional audits and to align with the requirements of the QAF.

A PHE association participant indicates the private higher education sector is regulated differently from public higher education. A differentiated approach could imply greater, more frequent, or different scrutiny of private higher education institutions:

*“I don't think the issue is so much over-regulation. When you look at public and private, it's differently regulated, so the privates feel that they are more regulated and because they are more regulated, they link it to over-regulated ... Privates do have a commercial focus and matters like resourcing will require greater focus because they cost money. We need to set norms and standards, and we do need to regulate it. I believe higher education does need to be regulated and private higher education, I believe, needs to be regulated differently sometimes from the university space.”*

The CHE's differentiated approach in the QAF (2021) takes cognisance of the diversity in the sector, and differing internal quality management systems, which could mean less scrutiny for some and more for others.

Len (PHEI3) and Holly (PHEI4) posit that the private sector is not “over-regulated” (Stander & Herman, 2017) but that there is overlap in responsibility between the CHE, SAQA and DHET in certain areas – thus duplication or triplication of information that is indicative of poor management and inefficiency in the system. Len posits that:

*“Within private higher education, you often come across very poor practices and I would not support the scenario where there's less stringent regulation...”*

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<sup>55</sup> See chapter 6

*the CHE's drive to make institutions more responsible for their own quality assurance is the right way to go to mature these institutions."*

One of the SAQA participants believes that the idea of being “over-regulated” is linked to the fact that providers should be “providing evidence” for every process, thus presumably the amount of effort and volume of evidence associated with this requirement presents as “over-regulation”. The DHET participant does not find the sector over-regulated and considers it to be “a very flexible environment” which allows institutions “to grow and develop, and there's a lot of space for innovation, for differences, etc.”.

Holly (PHEI4) and CHE Participant 3 share the DHET participant's view that there is no “over-regulation”, only regulation that is necessary to protect the student. Holly posits that regulation is essential and that the sector, and trust in the sector, has been improved because of it<sup>56</sup>. The participant indicates the institutions that have “survived are the ones who are concerned with quality”.

CHE Participant 3 posits that if private institutions follow the Act, implement the criteria and have a leader in their governance structures that takes accountability for what they are doing, “they won't have a problem with reaccreditation. It is really when they don't want to take up that responsibility is where the problem lies”. CHE Participant 2 posits that regulation and accountability are necessary to ensure compliance and that institutions take responsibility for quality assurance. The researcher would venture to add that quality assurance systems need to be in place as an accountability mechanism<sup>57</sup> towards the public. There needs to be a demonstration of how well quality assurance is managed – or, rather, how well management for quality is done.

The difference between public and private institutions was pointed out by CHE Participant 3 who expounded on how public and private institutions might have different focuses i) when doing planning; ii) determining costs; and iii) deciding what constitutes quality, with these three focus areas deemed “pillars” of education.

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<sup>56</sup> See participants' positive views about reaccreditation in this chapter.

<sup>57</sup> Stensaker & Harvey, 2013; Saidi, 2020

Furthermore, public institutions have to undergo PQM clearance<sup>58</sup> with the DHET whereas such a process does not exist for private higher education institutions. Public institutions also have “fixed structures in place to check quality” and it is not clear whether these exist in private institutions.

The lack of a PQM clearance process for private institutions holds a quality assurance risk in that they could go into mission drift. In other words, the initial institutional mission does not align with a diversified portfolio of programmes accrued over time. For example, an institution started as a niche area in fashion design but then adds Arts or Commerce programmes to its suite of offerings; or an institution started with a business management focus and then branched off into the education or engineering field. Some might argue that this does not constitute a concern, particularly since public institutions offer programmes across a range of subject fields. However, the challenge for the provision of a “quality” programme could be whether the institution has the relevant infrastructure, resources, appropriately qualified and experienced staff, specialist equipment, and so forth to introduce the new fields successfully and sustain it. The fitness for purpose and fitness of purpose for offering diverse programmes within a small institution, for instance, need to be examined. An additional concern, in terms of “PQM”, is that some institutions might offer programmes without having an internal underpinning qualification that would allow for vertical articulation<sup>59</sup> on the NQF within the institution<sup>60</sup> or might not provide any form of horizontal articulation<sup>61</sup> for students due to the limited number of offerings.

Besides PQM clearance, it is noted that other funding mechanisms are directed solely towards public higher education. For instance, public institutions are compelled to participate in the University Capacity Development Plan (2018-2020)<sup>62</sup> which seeks to galvanise transformation in the public higher education sector “to

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<sup>58</sup> Approval by the DHET for the programme and qualification mix (PQM) of the institution. This is linked to funding mechanisms for public institutions. (Department of Higher Education and Training (DHET), 9 May 2016)

<sup>59</sup> Vertical articulation is “articulation across NQF levels within an NQF Sub-Framework” (South African Qualifications Authority (SAQA), 2020), e.g. upward mobility from NQF Level 7 (Bachelor’s Degree) to NQF Level 8 (Honours Degree) → Master’s Degree at NQF Level 9 → Doctoral study at NQF Level 10.

<sup>60</sup> For example, pp.32-33 (DHET, 13 September 2021)

<sup>61</sup> Horizontal articulation is movement across programmes on the same NQF level.

<sup>62</sup> (Department of Higher Education and Training (DHET), 31 March 2017)

ensure high and equitable levels of participation and success across the system”. The Plan is funded by the University Capacity Development Grant which has transformation as the purpose and is a steering mechanism to drive the sector towards achieving its objectives. There does not appear to be any mechanism in place directly from the government to support development and capacity building in the private sector.

CHE Participant 3 indicates that private higher education institutions need to adhere to the requirements of the regulatory framework and that the CHE can provide support if required. The participant regards the regulatory framework as “straightforward” and “not so cumbersome”. This view is different to what Stander and Herman (2017) found in their study, i.e. that private institutions find quality assurance a complex process. A PHE association participant posits that the idea of it as complex is due to internal structures and processes and the indication is that the new QAF (CHE, 2021a) will not necessarily make it any easier for private institutions as it is linked to resourcing and quality management:

*“Privates finding it very complex – that is true because privates don't have the resources and personnel doing it. It's not because... they don't know how to do but it's because of the way in which privates have been set up, and I understand why they're set up like that. There's the profit imperative that's there, and ... the new QAF is going to be demanding. It's resource-intensive and it's financially demanding, and if you try and run that with a skeleton staff who are already your lecturer, your QA manager, your student support person, student administration for a period of time and the person marking all the scripts, you're not going to be able to manage that. I think the complexity is linked to the resourcing<sup>63</sup> of it, and the way privates are set up and the way they are structured and it's difficult to manage.”*

CHE Participant 1 posits that institutions need to be serious about and “demonstrate a readiness and willingness” to take on the quality assurance function:

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<sup>63</sup> The participant also indicates: “I'm not saying that the publics find it easier. Coming from a university, however, we had a big QA department and they focused on things and what became difficult is when quality assurance goes into the academic space. Academics are not always trained to tick all of those boxes, for example, and they don't like doing that work. It's tedious for them.”



*“QA must not be seen as something that is done for the CHE, but QA must be part of how institutions do their business. Every stakeholder within the institution must understand what it entails, from the students who do this, for whatever processes are used to involve students in QA, whether it's students surveys or so on.”*

Quality assurance is therefore not quality for the sake of compliance but the actual quality that is visible in the institution at all levels, in the “quality work”<sup>64</sup> that needs to be done by the “embedded actors”<sup>65</sup>. CHE Participant 3 believes that the idea of quality assurance being complex arises from the fact that it is regarded as a separate process when it should be viewed as “part and parcel of every minute process that you have in the institution”. The participant posits that in a smaller institution, there might not be available funds to employ a dedicated person to facilitate the process – thus it falls to the incumbents (“embedded actors”) to manage more than one portfolio. It stands to reason that, if viewed as added responsibility and additional work, instead of an intrinsic part of the work, then it could be regarded as “complex” or difficult to manage. This ties in with the PHE association participant’s view above regarding “skeleton staff” fulfilling multiple roles, as well as the point made by CHE Participant 1 that it all depends on how the institution engages with its process. An integrated, systematised, interdependent, synergistic process would alleviate the workload carried by an individual.

CHE Participant 3 is of the view that there is “a gap between senior managers and lecturers” where senior management’s focus in the organisation is to make money. An example was cited:

*“... when we did that large site visit in 2019. We found that they don't give the lecturers a full, permanent status, but they're employed part-time. How do you get commitment from staff if they don't have a full-time position? So, it's about governance and supporting the academic that actually brings in the money and is responsible to ensure that the students get a quality education. That gap between the two.”*

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<sup>64</sup> Elken & Stensaker (2018)

<sup>65</sup> Elken & Stensaker (2018)

A PHE association participant relates the current situation of part-time staff moving between institutions in a day, from one lecture to the next. Thus, seemingly disjuncture between being a for-profit business and being an educational institution that is required to deliver quality education. The gap between management and staff, or between being run as a business versus an education institution, seems to widen in the case of institutions that are merged under a holding company:

*“It’s because of the management styles, the link between the holding companies and institutions, the fact that the staffing is really an overall problem, and the fact, maybe, that institutions don’t want to spend money on laboratories and all of that, but they want to teach the programmes. There are certain things that they can’t teach. They can’t teach engineering programmes if they don’t have labs, or BSc programmes if they don’t have labs. So, those are the problems.”*

The participant is concerned that, in their planning and provisioning, private institutions might not be factoring in the NDP2030<sup>66</sup> goals to enable employment, alleviate poverty and eradicate inequality. This concern seems valid as it makes little sense in designing a programme in response to a skills demand in the country<sup>67</sup> if the graduate, for example, a qualifying engineer or nurse, is not properly trained to fill that gap<sup>68</sup>.

A few PHEI participants and a PHE association participant disconfirm the finding that there cannot be (a high level of) commitment from part-time faculty. Lizel indicated that sometimes full-time employment is not viable, therefore, staff with experience in the industry are contracted to teach in one specialist course. James indicates strong industry partnership in a participative education model which relies on part-time contracted staff to deliver in key specialist areas. The fellow PHE association participant indicates that for efficiency, the member institution checks with the prospective employee about the workload at the primary institution before contracting the part-time staff member on the “30% or 40%” time off permitted for

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<sup>66</sup> (Republic of South Africa (RSA), National Planning Commission, 2012): National Development Plan 2030

<sup>67</sup> (Labour Market Intelligence Partnership (LMIP), 2016); (Department of Higher Education and Training (DHET), 22 June 2018); (Republic of South Africa (RSA), 27 November 2020)

<sup>68</sup> cf. accreditation criterion 1(ix) (CHE, 2004b): The programme promotes the students’ understanding of the specific occupation for which they are being trained.

other work, and that the part-time commitment of members is written into the employment contract and that these duties are monitored because “I am paying you for it”. These commitments could include: “I can do the two industry seminars for you, and I can do my three tutorials for you and give you six hours of student support every week ... curating that discussion forum on canvas”.

The employment of part-time staff should therefore be considered in the context of the institution and its customised staffing model. Traditional notions of the workplace are changing due to the impact of COVID-19 and remote working conditions. Stanley indicates that, due to distance learning, the institution could, for example, “appoint a staff member who sits in Washington DC to teach on the programme”.

Holly (PHEI4) proffers the view that making a profit is necessary and that the “profit imperative” and the quality agenda are not mutually exclusive.

*“First and foremost, you need to be able to run an organisation and be able to make money and have some sort of profit in order to grow the organisation to be able to put back in. You can't just run on the income you get in but the assumption that it's a “profit motive” rather than an academic motive, or as opposed to an academic motive, that's so binary. The fact that the two are even conflated, to me doesn't make sense. When you look at the Ivy League institutions in America, the Harvards and those private universities that make millions and also have an amazingly strong academic reputation. So for me, the two are not mutually exclusive. I think it's a very poor assumption.”*

Holly iterates that the institution (PHEI4) is “driven by academic quality” and “also driven to make money because you can't put anything back, you can't value add, you can't improve anything you do”. Alex indicates that the lack of government subsidy is a big problem, therefore, fees are increased to cover costs. The institution offers a “premium product” at a “premium price” because it could not afford to run cheaper. This demarcates an elitist view within the public perception of higher education “that the public university structure is better than privates because privates are in it just for the money. The truth is that privates have to be in it charging high fees because they don't get subsidy, so it's a catch 22” (Alex).

The CHE intends to set standards and criteria for the new QAF<sup>69</sup> by which all institutions are expected to adhere, whether public or private. One of the SAQA participants indicated that regulation is necessary for ensuring quality:

*“You need to set the standard to make sure that everybody can comply to the standard. If they don't, then they know that they will not be able to be reaccredited ... it may create lots of administrative work for people but that also depends on how you structure your own business ... do you have a process in place to ensure – for verification, for moderation and all that, as well as overall checking.”*

The SAQA participant points to the need for a quality culture enveloping the quality management process at an institution:

*“Quality assurance and making sure that you keep your quality assurance – is not only a person in an institution; it's the institution, everybody working there.”*

As per the above viewpoint, quality assurance is again underscored as “quality work” (Elken & Stensaker, 2018) being done by all members of the organisation, thus collective management “for quality” (Brookes & Becket, 2007).

The empirical evidence indicates a lack of communication and lack of transparency regarding the process. A PHE association participant iterated that the external quality assurance requirements undergo frequent change and that the provider is not guaranteed accreditation of its programmes although the same set of accreditation criteria is followed. However, if one takes the peer-review process into account, this could be attributed to the fact that there are different peer reviewers for different programmes who might not share the same views. This implies that the peer-review process can be viewed as subjective. As indicated:

*“They struggle to get their programmes accredited, even the bigger players. They complain about it. The nitty-gritty things that they ask for now, like a health and safety certificate. They never asked for a health and safety certificate...the accreditation criteria are so old, but every time there is something new. We, as providers on the ground, are never informed of all the new stuff that happen, or new requirements when you submit an online*

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<sup>69</sup> CHE, 2021a

*application, or the new SAQA letter, or draft of a document, or the new online application. We have to sign in to see there's a new online application for an extension of programme offering or a site added. I think the umbrella<sup>70</sup> people are aware of that, so it's not a problem for them. They are on a lot of committees dealing with it. I feel that, when we applied to be on the audit review Board or something, the smaller players don't have a place there."*

The perception of unequal or preferential treatment of providers could be a hurdle for the new QAF that aims to adopt a more inclusive, collaborative approach. James proffered a profound view:

*"I've got children from DGs, DDGs, Ministers, that went through here, trade unions that followed classes here. Then I've got students from deep rural areas. What matters most for me is that a girl who was told at the age of 16 to stay put, this is her life, she's going to become a housewife, have children – today, what she's doing for her community is what matters ... we are playing a very important role in the transformation process ... (yet) we are being looked at differently ... we should have the same tools and the same opportunities as the publics."*

Further indicated by James (PHEI6 participant):

*"I think the DHET did a very good job by taking the fly-by-nights out and by informing the public about registered institutions, registration of qualifications, quality assurance, and so on. Yet, we are not part of the system, and we are not being treated equally. I know of many instances where we, at the same time, submit applications for accreditation. I know very well the DVCs of other public institutions, HODs, Deans – in six weeks' time, their qualifications are accredited. Yet, by us, it takes 14 to 15 months before you get your first letter."*

The perceived view of preferential treatment is compounded by the fact that all private providers pay for services rendered. Managing applications on a first-come-first-serve basis – consistently – is critical to a fair system. There should be

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<sup>70</sup> The "umbrella" would be the holding company/the larger provider that acquired other institutions and incorporated them into one brand.

reasonable timeframes attached to client service. The CHE has to consider the quality of its service in return for stakeholder investment and needs to have robust internal quality management processes in place.

In terms of costs incurred through the regulatory process, the CHE charges a fee for programme reaccreditation, i.e. R 14 506.00 per programme (“Fees effective as of 01 April 2021”; <https://heqc-online-1.che.ac.za/>?). The CHE indicates (<https://heqc-online-1.che.ac.za/>):

*“These fees cover the administrative costs to the HEQC in processing applications, including payments to independent evaluators. In addition, a fee is levied on any provider relocating sites and/or extending accredited programmes to sites of delivery without approval by the CHE.”*

If a site visit is linked to an accreditation process, including reaccreditation, additional costs are incurred, i.e.: i) site visit administrative fee – R8 703.00; and ii) additional sites of delivery per site visit – R3 481.00. Physical site visits would lead to further costs for travel and accommodation at the private higher education institution’s expense. Since COVID-19 restrictions are in place, the CHE has conducted its site visits on a virtual platform.

If the outcome for a programme reaccreditation application is negative, the institution may make representation at a cost of R8 703.00. If the outcome is deferred for lack of information to make an evaluative judgement on the application, the fee equivalent to a representation applies. If the programme is reaccredited with conditions, an administrative fee and a fee per condition for reaccreditation is applicable, that is R1 160.00 and R754.00, respectively. All payments are non-refundable.

For an idea of the cost that could be incurred by an institution during a programme reaccreditation cycle, the following scenario is depicted:

The PHEI submits 17 programmes for reaccreditation. The programmes are offered across two sites of delivery. Five programmes are reaccredited (without conditions), ten are reaccredited with conditions (three conditions each) and two are not reaccredited and representation has to be made. Following representation, the programmes are reaccredited with conditions (four and five conditions, respectively).

Itemised Cost:

Cost per programme submitted for reaccreditation: R 14 506.00 x 17 = R 246 602.00

Add site visit linked to reaccreditation: R8 703.00

Add the additional site of delivery: R3 481.00

Add representation for non-reaccredited programme: R8 703.00 x 2 = R17 406.00

Add conditions administrative fee per programme: R1 160.00 x 10 = R11 600.00

Add three conditions per programme x 10: R754.00 x 3 = R2 262.00 x 10 = R22 620.00

Add four conditions per programme: R1 160.00 Admin fee + R754.00 per condition = R4 176.00

Add five conditions per programme: R1 160.00 Admin fee + R754.00 per condition = R4 930.00

**Total cost: R319 518.00**

As per the above scenario, the programme reaccreditation process is a costly exercise for an institution, depending on the number of programmes and related proceedings (that is representation, deferral and/or conditions). Lizel, a PHEI1 participant<sup>71</sup>, indicated that for the internal quality management of programme reaccreditation, the institution contracts external peers from academia and industry to do programme reviews. The peers are remunerated for their services; thus an additional cost is incurred.

At present, the CHE does not charge for its services offered to public higher education institutions, but this is anticipated to change in the foreseeable future. CHE Participant 2 believes that institutions should pay for all services rendered. This is in the context of financial constraints experienced by Quality Councils that need to generate income to supplement baseline funding.

The DHET does not charge a fee for all its services. As indicated by the DHET participant:

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<sup>71</sup> Three participants from PHEI1 participated in this study. Seven private higher education institutions participated in total (PHEI1-PHEI7). See discussion in Chapter 4 and 5.



*“The only time they pay money is when they apply for registration and when they apply for an amendment to the registration and the application fee is R500.”*

The SAQA participants indicated that there are no associated costs for the registration of qualifications at present. As one of them stated:

*“In terms of the financial costs... at this point in time, there are no charges involved. But in the future, SAQA will charge for all the registrations ... And also looking at the financial situation of SAQA for now. I think it will go in that direction.”*

Although SAQA may charge a fee for services delivered, as mandated by Section 21 of the NQF Act (RSA, 2008), it has not exercised that right concerning the registration (and reregistration) of qualifications. The organisation will seemingly have no choice but to consider this an avenue to generate income. The SAQA *Annual Integrated Report 2019/20* (p.25) indicates that SAQA receives 54% of its budget from government funds and has to supplement income through “self-funding mechanisms and generated income from its services”. In the 2021/22 financial year, SAQA received 44% of its budget from the fiscus and had to raise the remaining 56% through fees charged for services ([https://www.saqa.org.za/news/saqa-serves-notice-retrench-staff?language\\_content\\_entity=en](https://www.saqa.org.za/news/saqa-serves-notice-retrench-staff?language_content_entity=en)). As indicated on the SAQA website and in the media, the organisation had to retrench personnel due to financial constraints<sup>72</sup>. With its workforce practically halved, this could harm the efficiency of service by the parastatal (<https://www.gov.za/about-government/contact-directory/soe-s>).

## **5.3 CURRENT STATE OF PRIVATE HIGHER EDUCATION**

### **5.3.1 Diverse private higher education sector**

One of the PHE association participants indicated involvement in a study conducted<sup>73</sup> by the CHE on private higher education in which it was found that “there's just not one set of norms that you can put down to define the programmes.

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<sup>72</sup> [https://www.saqa.org.za/news/saqa-serves-notice-retrench-staff?language\\_content\\_entity=en](https://www.saqa.org.za/news/saqa-serves-notice-retrench-staff?language_content_entity=en); <https://www.timeslive.co.za/sunday-times-daily/news/2021-05-04-a-travesty-well-run-parastatal-has-to-slash-staff-by-half-to-fund-saa-bailout/>; <https://mediadon.co.za/2021/05/18/nehawu-statement-on-the-retrenchment-at-saqa/>

<sup>73</sup> Details of the study not provided here to protect the identity of the participant.

Some of the not-for-profits are big and they're doing postgraduate programmes as well".

As gathered from the above statement, several variables can determine the size and shape of the private higher education sector, *inter alia* number of programmes, number of sites of delivery, student enrolment. As found through this study, there are small, medium, and large institutions depending on the number of programmes on offer (which was the determining factor for this study during sampling<sup>74</sup>). However, the institution might hold a different view of its size. For instance, for this study, PHE11 was regarded as a large institution as it had more than ten programmes when sampling was done. Although the institution currently has more than 18 registered programmes across four faculties, it considers itself a small institution. Growth is envisioned and it is anticipated that the current contact learning campus will not accommodate planned expansion and that new premises would need to be found. The institution currently caps its intake for contact learning at maximum capacity for the site of delivery, since the "infrastructure only makes provision for that" (Lizel). Budgeting is based on a ten-year projection plan, incorporating all planned new programme accreditation applications. For instance, the institution has budgeted R7,9 million over the next four years for the addition of two new programmes that will be offered as soon as accreditation and registration processes are complete. The institution has sound-proof studios and state-of-the-art facilities available on its contact learning campus and similar facilities at study centres for distance learning students to enable synchronous learning and teaching. Students have access to physical and online libraries. Lizel indicates that this enables parity of provision for contact and distance learning students.

Larger institutions might have evolved by adding to their programme offerings, and consequently a larger student body. Some have expanded through the acquisition of other institutions<sup>75</sup>.

CHE Participant 3 sheds light on the establishment of some small institutions in the private sector:

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<sup>74</sup> cf. Chapter 4

<sup>75</sup> cf. Chapter 2

*“Some people start small institutions because they retire or lost their jobs and then think they will start a training institution, a private higher institution. If they take that decision, they know that they have to comply with the regulatory framework because in their jobs in the corporate world they would have done that as well.”*

It is further indicated that some of these start-ups are run by academics that previously worked in the public sector. The institution is set up to cater for a perceived demand in the market. The other trend is that academics from the public sector are employed in senior positions, e.g. as Academic Director or CEO, of a private institution. CHE Participant 3 indicates that these academics might have extensive experience as teachers or courseware designers but do not necessarily “show the leadership in all the fields in the business”:

*“They don't want to be bogged down by rules and regulations ... but forget that they were in a large institution that had the infrastructure in place where they were not really involved in cross-checking the quality, but just did the teaching.”*

In the participant's opinion, an institution cannot do as it prefers, and “can't plead ignorance” of the regulatory framework and not adhere to requirements. It is the institution's obligation in terms of the Higher Education Act<sup>76</sup> to be cognisant of all the requirements when operating in the higher education sector.

CHE Participant 2 recounts, from first-hand experience during site visits, that some institutions are “absolutely excellent” and that graduates “will get employment from some of them quicker than they would from a university”. However, there is acknowledgement of “unique problems” that beset the private sector: i) over-reliance on contract lecturers, who might be poorly paid, which results in high staff turnover; ii) academics might not be involved in curriculum development and approval – this could almost entirely be controlled at institutional level in the case of large institutions (“It's almost a kind of instruction of what to teach, when to teach – like a syllabus to follow – that's not higher education”); iii) students are issued workbooks and might not be required to do much independent/self-directed study and research which does

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<sup>76</sup> Act 101 of 1997 as amended

not prepare them for higher education. Improvement in these areas is required for quality higher education to be realised:

*“... it cannot be done by the CHE playing a policing or a watchdog role, because then institutions simply comply and window-dress. What is really needed, is for the institutions to own that quality, to be proud of it, to be worried about their reputation and reputational risk, and really wanting to be the very best. The bottom line is important, but putting in the resources or financials, staff, etc. is important if you want a well-functioning institution.”*

CHE Participant 1 finds that the reaccreditation process, particularly if a site visit is conducted, enables confirmation of the number of programmes on offer and the sites at which they are delivered, and it also serves to indicate any changes that have transpired within the institution over time. The external quality assurance process enables the CHE to “take a systems view” on developments in the sector, particularly when it comes to mergers and acquisitions. The CHE participant finds that institutions provide information piecemeal on these developments and that the CHE is placed on a need-to-know basis, which marks a strategic release of information to the Quality Council, and if there are sudden changes the CHE either realises this too late or is apprised at the last minute. This is seen to erode the position of trust on which the CHE entered discussion around the merger or acquisition.

### **5.3.2 Compliance**

It is recognised that, even though there might be providers in the sector who do not adhere to regulations and requirements, the majority of providers are compliant and strive to remain such. Lizel posits that private higher education has gone a long way in earning trust in the sector due to compliance and regulation.

However, this is not necessarily a black and white area, nor can a generalisation be made that there are only “good” or “bad” institutions. David points out the disparity between overseas Ivy League and public universities; and the divide, locally, between those that do “outstanding” work and those not producing.

Some compliant providers<sup>77</sup> might partake in spurious activities. Examples cited by a SAQA participant:

*“When you look at some of the providers ... they claim that they are accredited, but when you look at the qualifications ... It's already deregistered, for example in 2015, but they're still offering the qualification because they say that it's a good qualification ... They do it for money. And, unfortunately, the learners are the ones that are disadvantaged in the whole process ... learners pay for it, but then they don't get the service or quality training. Or they advertise that, if you enrol with them, they guarantee that you will get the job. And when you complete your qualification ... they will say they cannot help because it changed or something like that. I think that in the accreditation process when you look at that, you may see you will be able to sift between the good and the bad actors. Your bad actors are always those people that will take you to court, that will say, but it's not part of your policy, it's not part of your criteria.”*

The participant regards the programme reaccreditation process as a way of identifying providers that are engaging in a dubious activity. It is also a means of identifying poor-quality programmes in the sector. As indicated by CHE Participant 2:

*“Some of the institutions ... are more interested in the bottom line and profit imperative rather than the improvement part and putting in the money that is required for these improvements, such as getting sufficient numbers of trained academic staff at the right levels, having the learning resources, such as the library. If it's a contact institution, the lecture facilities, etc., of a decent quality. That is really regrettable because sometimes this lands in litigation, which the CHE does not want, but the CHE will follow through if it finds that these institutions are offering programmes of such poor quality.”*

In this researcher's opinion, if litigation ensues, it would be an inopportune deployment of resources for any financially constrained authoritative body. However, it could be seen as an opportunity to reflect on systems and processes and review the implementation of legislation and application of policy to strengthen the oversight

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<sup>77</sup> They have achieved compliance with all the relevant authorities, i.e. DHET registration, CHE programme accreditation (and reaccreditation), and SAQA registration.

role. Litigation could thus serve to heighten awareness around shortcomings which could lead to revised processes and possibly a different angle or level of scrutiny within the quality assurance process. It is the researcher's opinion that the litigious private institution could indirectly play an enabling role in strengthening regulatory oversight if more stringent measures result from reflexive practice – compliant providers will also be at the receiving end of these more robust measures. Nonetheless, a proactive approach, rather than a reactionary response, would be more conducive to promoting quality in the sector.

The DHET participant recognises that the profit imperative plays a role in private higher education provision which could lead to unscrupulous behaviour by some. As indicated:

*“I think, in any industry, the average person will look for ways to cut corners and to maximize profits and sometimes it's difficult to distinguish between what's ethical and unethical and what's legal and illegal. Where they do cross the line and the practice or the act is illegal, then we deal with it.”*

Examples of unscrupulous behaviour were cited:

*“One example I want to give you, and this is common, and this is going to be a big problem for SAQA and us, is the misrepresentation of qualifications vis a vis the advertising and the promises made ... For example, the BCom degree is sold as a BCom in human resource management or financial management or public relations. When you talk about unscrupulous fraudulent providers, that is what we are talking about, the current challenge. Another example, the Diploma in Management is sold as a Diploma in financial management, and we get to know at the end of it when the certificate is issued to students and then SAQA is seeing it for the first time that the wording, that the title of the qualification, is not the same as that on the NQF or on the certificate.”*

CHE Participant 1 posits that there are “bad actors”<sup>78</sup> in the private higher education sector:

*“I would agree that there are institutions that put financial interests above the interests of the students and it is those providers who, unfortunately ... will put*

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<sup>78</sup> Kinser & Lane (2017)

*more effort and more money, into trying to find loopholes that they can exploit CHE processes rather than spending effort in doing the right thing. I would call them bad actors and I think through the reaccreditation process we are able to look at the institutions and see what's happening.”*

“Fly-by-night” institutions are still prevalent in the sector. The DHET has a demanding task in keeping this under control:

*“If we don't remain vigilant, these colleges will pop up and the biggest threat currently is the online delivery of programmes.”*

Although the DHET does advocacy around “bogus institutions” and publicises these in the *Register*<sup>79</sup> and through media alerts<sup>80</sup>, students continue to be deceived by these institutions. The DHET also opens criminal cases against illegal providers<sup>81</sup>. The online offering of programmes is a difficult space to “police” as it falls outside the jurisdiction of the DHET into a different legal space. These institutions are most likely only visible on the internet and do not necessarily have a physical presence in South Africa. The DHET advises the only recourse to be via the legal system:

*“I think, as a first step, we name and shame and as more and more students get ripped off, they would have to go to SAPS directly. It's not the Department's issue here. They must go to SAPS and then SAPS will investigate on the Internet, etc. with the banking details and then deal with them.”*

The reputation of compliant providers is indirectly tarnished by the unethical behaviour of those who circumvent regulatory requirements to be authorities unto themselves. The diverse nature of the sector makes the issue of trust tenuous. As CHE Participant 1 indicates:

*“A particular institution stood out as I looked at these compliance letters, and when I opened it, I found an institution that we have placed on an improvement plan. In fact, the initial decision of the HEQC was to withdraw*

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<sup>79</sup> *Register of Private Higher Education Institutions*, 13 September 2021

<sup>80</sup> (Department of Higher Education and Training (DHET), 21 September 2017); (Department of Higher Education and Training (DHET), 17 October 2017); (Department of Higher Education and Training (DHET), 24 July 2017)

<sup>81</sup> (Department of Higher Education and Training (DHET), 28 March 2017)



*accreditation. They then made a case before the HEQC and the HEQC opted to put them on an improvement plan and not allow them to enrol students, but the numbers that were reported to HEQC, to HEQCIS<sup>82</sup>, gave me the impression that this institution has actually been enrolling students into this programme. What is of particular concern, is that they've made every effort to ... delay the site visit which will be the basis for final decision-making on their programme ... Sometimes we try to meet with institutions halfway, but only to realise that the institutions are playing a different game. I think we need to consider how much trust we give to institutions when they approach us. I think sometimes we do trust them and we expect them to give us the same courtesy.”*

It is important to alert the public to illegal operators in the sector. CHE Participant 2 posits that there needs to be greater visibility and publicity around those who do not adhere to regulatory requirements. These institutions should not be treated with kid gloves. The CHE needs to do its job properly. It is the CHE's responsibility to protect the student from poor-quality programmes, and the collective responsibility of the CHE, DHET and SAQA to make the public aware of illegal operators. Equally important, is to publicise the compliant, legal providers in the sector and the accredited and registered status of their programmes and qualifications. By holding the positive upfront, which is the majority of operators in the sector (cf. *Register of Private Higher Education Institutions* published periodically by the DHET) there is an endorsement of the good that is being done in the sector. This should be widely publicised by the authorities. SAQA does this on their website<sup>83</sup>, the DHET does this through its registers, and the CHE needs to do this – consistently.

After every external quality assurance review cycle, such as a national review, institutional audit and programme reaccreditation, and after every amendment of registration cycle, the outcomes, both positive and negative, should be widely dispersed and institutions should be compelled to publish the status of their

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<sup>82</sup> The Higher Education Quality Committee Information System (HEQCIS) is the data system used for capturing student data in the private higher education sector. The information collected on HEQCIS is either needed in order to fulfil the obligation to send data to the National Learner Records Database (NLRD), or is used by the CHE in assessing the state of higher education provision in South Africa. (<https://www.che.ac.za/faqs/higher-education-data>)

<sup>83</sup> cf. “Originator” and “Accredited Provider” (<https://allqs.saga.org.za/search.php?cat=qual>)

programmes and qualifications on their websites. In my opinion, it is not sufficient to only issue the institution with a compliance letter or certificate of registration. Once accreditation and registration are achieved, the information lands in the public domain thus the public should be informed on relevant platforms. It is worth considering whether these requirements should be included in the regulations or policy. In this way, the regulator is also protected by taking a proactive stance. Transparency is key to creating a trustworthy, quality higher education sector. It is noted that there are several publications<sup>84</sup> in the sector detailing the performance of students and institutions, enrolment figures per institution, and so forth, including the documentary evidence provided by the DHET<sup>85</sup> which is a comprehensive report on the annual compliance of private higher education institutions. However, the general population might not be aware of these, thus added measure would be to have public and private institutions publish their status – student enrolment and throughput, accreditation and registration, faculty composition and so on – will inform the public upon access to these websites.

CHE Participant 1 has noted, through external quality assurance processes conducted by the relevant Directorate, that some institutions enter “murky waters” when they offer courses in other spaces together with higher education:

*“... some private providers – the ones who also have a very large number of short learning programmes, or the smaller ones that also offer short learning programmes – they begin to struggle at some point with balancing the higher education needs with the SLPs. One of the institutions that we engaged with recently, for example, only has a single programme registered in higher education, but in a site visit we failed to get to know exactly how many programmes, how many short learning programmes, they're offering but we were able to count about 32 minimum and, yet, for this one higher education programme there's not a single policy that is applicable to it. So, it's just treated as one in the basket of programmes. Actually, I was tempted to even think that this, having one programme accredited by the CHE is actually a credentialism thing, where the institution can just boast to have been accredited by the CHE, to give them a certain stand and then they can just*

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<sup>84</sup> DHET, 2021a; DHET, 2021b; DHET, 2021c; CHE, 2020

<sup>85</sup> (Department of Higher Education (DHET), 2021c)

*continue to run their core business, which is the short learning programmes...”*

Offering a higher education programme in a convoluted environment, as described by CHE Participant 1, implies the sharing of resources, infrastructure, and facilities. The distinction of higher education is not clear, and the quality of provision is questionable if it is treated as a side-line to the core business. The quality imperative and academic project are overshadowed by the profit imperative in this instance as it is common knowledge in the sector that short courses generate a substantial amount of income for providers. All the private institutions that participated in this study, except one, offer short courses (including the few that are registered as non-profit companies) and have international and/or regional presence in the offering of higher education programmes, and/or international affiliations.

### **5.3.3 Capacity building**

The DHET participant indicated that there were certain areas in need of development within private higher education institutions. These are: i) governance and management and linked to that; (ii) organisational development and how to strengthen the organisation to operate an institution of higher learning; (iii) programme development, how to develop programmes, which has to do with accreditation; and iv) issues of student development and how to support student development across the spectrum, from working class to upper class from academically disadvantaged to the academically advantaged to students who require specific assistance in specific disciplines.

In terms of capacity building, the DHET can advise in terms of policy and its research conducted in certain areas and can identify “certain programmes are in need and others are not in need”. The participant indicates that the DHET is open to assisting in various ways provided that there is the capacity to do so, and it falls within its mandate. Issues pertaining to accreditation, that might be brought to their attention, would not be attended to as these fall within the ambit of the CHE.

The CHE has identified capacity development, along with quality promotion, as a function of the new QAF (CHE, 2021a). The CHE indicates that COVID-19 brought challenges for higher education institutions to the fore, with a heavy impact on learning and teaching (CHE, 2021a, p.6). This has amplified the need for institutional

quality assurance and capacity building in the sector. Capacity development is intended to strengthen internal quality assurance mechanisms (*ibid*). Before capacity development can commence, there needs to be an investigation and analysis of the immediate needs and methods of implementation. Nukunah *et al.* (2019) propose further studies on how institutions “manage issues around funding, quality, programme design and capacity development” which would serve as “objective measures of performance”.

Stander and Herman (2017) identified capacity development and programme design as two “major categories related to the barriers and challenges particular to PHEIs as they engage in the management of QA”. These areas in need of development are not unique in the region or within the SADC (Hoosen *et al.*, 2017, p.12). There is a need within the higher education system of the SADC to build a quality culture through raising awareness and capacity building of all stakeholders (*ibid*). This links to an earlier point about capacity building also needed within the CHE’s operational structures. One of the CHE participants indicates that there is “a dearth of capacity” at the CHE. This is attributed to the fact that higher education institutions “poach” staff, particularly at senior levels, through more lucrative offers. The departure of expert skills and knowledge, and institutional memory, is a significant loss for the organisation. To be a thought leader and intellectual hub in the higher education sector, the CHE needs to attract the “cream of the crop” onto its organisational structures to ensure “quality work” that befits a Quality Council. The participant indicates that the CHE has drawn experts from the sector into working groups to incorporate the intellectual capacity needed for the conceptualisation of the QAF and will continue to leverage these collegial partnerships during planning for, and implementation of, the QAF. There is confidence in the capability of the top leadership within the organisation to drive it strategically towards achieving its goals.

CHE Participant 3 posits that capacity building should address identified needs and also be done in general, and continuously, to extend the basic support that is already provided. These developmental sessions could attend to curriculum design, programme review, and so on. CHE Participant 2 raises a valid point that institutions need to know how to conduct the “business” of higher education otherwise they should not be operating in the higher education space:

*“If you don't understand higher education, you won't be able to provide quality higher education that will give the students a very valuable learning experience so that they will be able to exit and graduate with graduate attributes that are appropriate for the future world of work and the society that we live in ... That student that comes in the first year has to be a different human being from the one that graduates at the end of three or four years in terms of the knowledge, skills, values, and attitudes. That's the part we often talk about ... what we find, is that many institutions really don't have this understanding of higher education. They start a business. They are buying businesses...”*

The CHE should nonetheless consider implementing training sessions for new private providers, in collaboration with the DHET and SAQA, on the accreditation and registration processes. If the ground rules are laid down upfront the likelihood of any institution pleading ignorance and attempting to thwart regulatory measures could diminish.

The PHE association participants concur that capacity building<sup>86</sup> is required in the sector, and this is taken to mean actual engagement between parties, perhaps in the form of workshops, not just information sharing. One of the participants referred to *ad hoc* engagement between the participant's institution and a few smaller private institutions in need of assistance. The mutual sharing of ideas and feedback on documentation for the regulators, e.g. the annual report, is found to be beneficial but limited since institutions guard against their intellectual property going public. This links to the conceptual framework, *viz.* the Open PHEI System Model, which proposes that institutions need to be receptive to the external environment to receive input (e.g. feedback) that can be operationalised to achieve compliance.

There is a willingness and readiness within the private higher education sector to assist the CHE with the capacity development that needs to happen:

*“It needs to be workshops where it can be two-way engagement around even compliance and capacity building. From a (PHE association) perspective,*

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<sup>86</sup> cf. Chapter 2: Stander and Herman (2017) identified capacity development as a key area where barriers are experienced. Also see Hoosen *et al.* (2017) regarding the “lack of QA capacity at the institutional and national level”.

*there are some good people who would be prepared to assist. I don't believe that CHE has the capacity to do all of the training with privates. If we do training through an organisation like (PHE association), we will be able to do many of these training sessions and then, if there are areas that can't be answered or questions, that it comes back to the CHE ... If it's something that could be considered – using the sector to also train and develop the sector.”*  
(Researcher's insertion)

Although this option is a reasonable one to consider, it is not clear whether there would be conflicting perspectives with that of the Quality Council in how it wishes to approach its development initiatives – from an external quality assurer viewpoint versus different perceptions of “quality” and “good practice” in the sector. The fellow PHE association participant indicated the following:

*“I also notice that what is good practice in (PHEI A) is not necessarily good practice for (PHEI B) because we are much smaller than the (PHEI A) group. What is good practice for them is not always good practice for us, but that's not to say that we are not compliant.”* (Researcher's insertion)

It should also be considered who these “good people” would be and if their agenda would cater for diversity in the sector. However, the CHE intends to take a differentiated approach. Judging from the CHE's narrative in the existing quality assurance framework, its founding documents, the new QAF and its *2018/2019 Annual Report*, and all its external quality assurance practices that employ peer experts, its quality assurance and quality promotion activities are based on partnering with experts in the sector. From an objective vantage point, not doing so could i) be resource-intensive; ii) spread its capable resources too thin; iii) possibly present a one-sided view of quality assurance; iv) probably be viewed as arrogant and subjective; and v) not display good practice to harness the strengths of peers in the field, the experts, to lead these quality discussions. As the CHE intends to build a Community of Practice within each subject field and for quality assurance aspects such as standard setting (CHE, 2021a), it would stand to reason that a group of peers from both public and private sectors be constituted as a CoP for quality promotion and capacity building based on the identified need.

### 5.3.4 Sustainability of private higher education institutions

The DHET participant identifies three key areas for the institution to be sustainable: i) access to funding; ii) organisational stability; and iii) accreditation. The DHET participant indicates the following:

*“It requires funds. It requires funds for a good infrastructure. It requires funds to hire quality personnel at both the academic and non-academic level. What you find, is that with privates one person is hired to carry out several functions, not necessarily in that person's portfolio, and these are like cost-cutting measures.”*

The DHET has deregistered institutions that could not fulfil their financial obligations. Running an education institution, of any sort, should surely then take a considered approach at the outset. As much as private higher education can be a lucrative business for some, it is an institution of learning, with the student as the “product” in development until the output of a graduate with the requisite knowledge, skills, values, and attitudes to take up a place in employment and/or further study. Thus, an institution of learning should not be started without a vision and mission, sound business plan, governance and management structures in place, sufficient capital/investment, adequate specialist knowledge, expertise and skill on board, proper infrastructure, and facilities, among other crucial elements needed for sustainability as a going academic concern<sup>87</sup>. There cannot be compromises made on quality as the “product”/output produced through a sub-standard programme will be “sub-standard” and not have the required capabilities to rise to the demands of the workplace or further study.

CHE Participant 1 finds that, in terms of providing quality education, the sustainability of private higher education hinges on the extent to which the institution engages with its process, and the credibility of its quality assurance processes. A PHE11 participant posits that external quality assurance, in the form of programme reaccreditation, should not be about “getting these things ready because it’s that time again”.

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<sup>87</sup> cf. Regulations for, and the guide to, registration as a private higher education institution; (Department of Higher Education and Training (DHET), 2016a); (Department of Higher Education and Training (DHET), 2016b)



*“It should always be there. The CHE should, at any time, be able to say, ‘Tomorrow we are there’, and it should be ready<sup>88</sup>. That’s how it works in banks and that’s how it works in industry. Anybody can, at any stage, just come in and check your things and it should be right. There shouldn’t be issues.” (Lizel)*

Besides making sure that things “are going on well” in the organisation (CHE Participant 1), Len (PHEI3) posits that his institution has had “enormous longevity in our programmes” due to formalised relationships with the various industries that it serves. They serve diverse industries: aviation management; risk; payroll; any number of business disciplines and business sub-disciplines. Industry feedback<sup>89</sup> has been included in the qualification design, qualification review, learning and teaching practice, with technology, so every aspect of the students’, or “every touchpoint, in the students’ teaching and learning life cycle is influenced by the stakeholders, very formally”. Due to diverse industry needs, the programme longevity is also ensured through it not being developed for niche (specific) applications.

*“We safeguard ourselves from ... putting qualifications out into the world that can become obsolete because a specific discipline falls out of favour or there’s been some significant movement in a specific discipline.” (Len)*

The above implies that the institution would need to do benchmarking with national and international qualifications, and liaise with relevant stakeholders to design a programme that complies with requirements:

*“The programme is consonant with the institution’s mission, forms part of institutional planning and resource allocation, meets national requirements, the needs of students and other stakeholders, and is intellectually credible. It is designed coherently and articulates well with other relevant programmes, where possible. The design maintains an appropriate balance of theoretical, practical and experiential knowledge and skills. It has sufficient disciplinary content and theoretical depth, at the appropriate level, to serve its educational purposes.” (cf. accreditation criterion 1; CHE, 2004b, as amended)*

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<sup>88</sup> Note that a PHE association participant also echoed this sentiment.

<sup>89</sup> cf. accreditation criterion 1 (CHE, 2004b, as amended)

It should be noted that, for the programme to remain relevant and marketable, programme review needs to be done at regular intervals or as dictated by need.

Len contends that the sustainability of an institution depends on knowing and understanding the processes, policies, criteria, and so forth required to operate in the sector. Being *au fait* with the regulatory framework has stood the participant in good stead because:

*“When I started in academic quality assurance, I just gathered up all of that information. I gathered up what was available from the CHE at the time and made sure that I studied it. It's actually very comprehensive, although, like I said, I think there's some standard-setting that's missing but everything you need is there.”*

The CHE intends to embark on full-scale training and development in preparation for the QAF, therefore, based on the above experience, institutions would be well served to be in attendance at all these sessions. The participant cautions private institutions that:

*“Everything you do, on paper, you need to be able to confirm that this is happening in practice ... often you know what the best practice is, you know what the ideal practice is. You know there's cost implications, there's personnel implications, resources. So, in that sense, you can't make that promise until you have the means to deliver it. Rather move slower in your development of policy, teaching and learning practice, technologies, resource application, whatever the case is, but make sure that you can meet that promise.”*

A PHE association participant is likeminded on the above advice and emphasises that institutions need to be frank about their strengths and weaknesses, else they will not receive the necessary support, and continue to hold up a front, which could result in stunted development (in quality assurance) and become unsustainable in the context of regular external quality assurance.

*“Don't lie on your papers because, with the site visits and reaccreditation processes – and the market is only that small – so everyone knows if you're saying you have this building and that building and it's not true. Be honest*

*with them. If there's a lack in your programme, tell them there's a lack in your programme.”*

The participant is positive about the extent of the support received from the CHE, even in assisting with filling out forms. Thus, it is also about building good relationships with the regulators for collegial engagement.

### **5.3.5 Private higher education association**

There are two private higher education associations, of which two members of one association agreed to participate. Both members hold prominent positions at their respective institutions and are involved in the internal quality management process, including programme reaccreditation. The participants outlined the purpose of the Association and provided insight into its inner workings.

The Association is open to any private higher education institution regardless of non-profit or for-profit. Affiliation comes at a fee which used to be a single amount irrespective of the size, shape or offering of the institution. The membership fee has been revised in terms of institution size (linked to several programmes). One participant indicated that her institution's annual membership fee is R40 000, with a sliding scale for smaller to larger institutions in terms of the number of programme offerings. The fee could become unaffordable to the participant's institution if it expands its programme offerings. The membership pool is not large at under 20 member institutions and, although members attend meetings, not all actively participate. There are ordinary members and those that serve on the Board and/or Executive Committee (EXCO).

Besides the revised membership fee, the Association is also reviewing the applicants who seek membership. As stated:

*“... up to now, we have not looked at institutional compliance with DHET/CHE standards. However, there is a feeling that, if (**the Association**) wants credibility and integrity, like I said to you, we need to begin to hold each other to account. This is something that must be discussed by the Board... My view is that, if someone is allegedly non-compliant, (**the PHE association**) can provide interim membership. You don't get full membership until you are compliant. (**The PHE association**) (does) not want to monitor institutions.”*  
(Researcher's insertion)

With more stringent requirements, membership becomes restrictive. Some of the current members are smaller institutions. Members include the larger institutions and a certain number that are established and have been in the sector for a decade or more. Although a member institution might be considered a “small” higher education entity, it might have an FET or OQSF division that makes it a larger enterprise.

In terms of the increased fee, the one member queries the actual value of association if this is disaggregated in terms of actual activity. As stated:

*“It’s like everyone belongs to his own church. They (the PHE association) don’t address the concerns”.* (Researcher’s insertion)

There is information sharing and discussion of common concerns about accreditation and registration processes, but the Association does not take forward the concerns of the collective. It also does not offer any legal counsel if an outcome with the CHE, SAQA or DHET is contested. Each member institution needs to address its concerns regarding conditions and reasons for non-accreditation/non-reaccreditation independently. However, it is indicated that, for example, if anything in the new QAF “was unconstitutional or administratively unfair, then there would be a legal opinion that we would agree, as a Board, we need for the sector and then (the PHE association) would get involved, but not for an individual institution”.

Two private higher education participants alluded to the idea that the Association could be established as a formal body (such as in other parts of the world) to act as intermediary “quality assurer” of sorts between the institution and the CHE. The participants indicate that the private sector is too diverse. Len posits that there are “too many institutions with dubious practices that bring the entire sector into disrepute” and that the CHE “is too small to regulate to that level of practice across the board and, because of that, trust will always be questioned”. The association is viewed positively:

*“The level of expertise that you’ve got around that table, given the quality of the institutions that sits around that table, I think it’s a good organism to help establish trust between the CHE and the private higher education sector because of that code of conduct. It’s about promoting the sector as a whole. I think by adding those codes of conduct, or expected codes of conduct, you’re adding a tier of quality assurance that the CHE can’t really touch.”*

However, a PHE association participant indicated that this would not work in practice because:

*“I wouldn’t relinquish my institutional autonomy to **(the PHE association)**. **(The PHE association members)** would want to retain their autonomy and their Boards would probably object vehemently over everything going via **(the PHE association)** then to the regulator.”* (Researcher’s insertion)

The PHE association participant indicates that the revised fee structure has been implemented to accrue funds to employ a dedicated administrator, who is preferably a prominent figure in the sector, to take forward the concerns of the Association to the DHET, SAQA and CHE on behalf of its constituents. It was indicated that there have been attempts in the past by former members to address issues with the regulator, but due to financial constraints and other commitments, these have not been sustained. There could be the possibility, as gathered from the data, that some larger institutions might use this as a vehicle to lobby for university status. However, both PHE association participants believe that many institutions might deem themselves incapable of meeting the criteria (which are as yet unpublicised) and would not venture forth in this area<sup>90</sup>.

One of the PHE association participants indicated that the Association could play a valuable, and perhaps pivotal, role akin to that of Universities South Africa (USAf)<sup>91</sup>. The participant posits that the value in this would lie in the fact that, because of the “politics and the roles” – especially amongst the private institutions with their “different visions, different missions and different purposes” – the institutions would want to have their engagements but there is recourse to the Association if there is an area of concern if there is a problem that must be discussed in and for the sector, which can then be taken to the regulator as well.

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<sup>90</sup> A PHE Association participant indicated that the member PHEI would “find it difficult to compete with the public norms and criteria, because we don’t have that, especially the research focus and matters like integrated community engagement. I’m very proud to say last year, we got 63 accredited publications which I think is good for a private like ours, but it doesn’t compare with what the universities are doing. We also don’t have the PQM mix. We’ll probably never go into the sciences, for example. It will depend on what the other standards are that they put in.”

<sup>91</sup> “Universities South Africa, formerly known as Higher Education South Africa (HESA), is a membership organisation representing South Africa’s universities. Our new name was launched on 22 July 2015 in order to reposition the organisation as a representative body of South Africa’s public universities, that aims to promote a more inclusive, responsive and equitable national system of higher education”. (<https://www.usaf.ac.za/>)

A PHE11 participant indicated that the institution was a member of both the alternative private higher education association and USAf. According to the participant, there are about ten private institutions affiliated with USAf. The forum is found useful to engage with public and private providers, each with its challenges, that provides for a learning environment.

As discussed in Chapter 2, the regulator needs to monitor developments on this front as the association and partnerships that are established through this can evolve into a force that has the potential to change the face of the private higher education sector, which could either be beneficial or detrimental to the sector as a whole. Examples of prominent private higher education associations are found in different parts of the world, and they have asserted themselves in their home countries as a noteworthy component of the higher education sector<sup>92</sup>. It is clear the PHE Association is re-evaluating its role and purpose and has planned its way forward. By becoming more selective about membership (through its revised fee scale and new sifting process), it aims to be a reputable organisation that will represent its constituents at the highest national levels.

There is undoubtedly an advantage to forming partnerships with public or other private institutions. The impact of COVID has seen successful partnerships being formed in Europe and Asia-Pacific as indicated in the report by Marinoni, Van't Land and Jensen (2020, p.22). The DHET participant recognises that there is a challenge with funding in the private higher education sector. Although not clear how the DHET could assist, the Department is open to ideas and suggestions from “anyone ... who's interested to come forward”. In this regard, it could be useful for partnerships<sup>93</sup> to be established as one PHE association participant indicates:

*“... in our private capacity as (**Institution A**), we've just signed an agreement, a partnership agreement, with (**Public Institution A**) for instance where our School of Media and Design and their School of Arts have agreed to*

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<sup>92</sup> <https://www.naicu.edu/>; <https://www.oracle.com/apac/news/announcement/association-of-private-higher-education-institutions-2021-09-23/>; <https://www.napei.org.my/>; <https://education.stateuniversity.com/pages/2263/National-Association-Independent-Colleges-Universities.html>; <https://m.facebook.com/APHEINam/posts>; <https://www.napti.us/accreditation/>; <https://www.universityworldnews.com/post.php?story=20180703072306529>; <https://kenapco.org/>; [https://icwashington.org/page/coalitions\\_affiliations#](https://icwashington.org/page/coalitions_affiliations#); <https://ihea.edu.au/>

<sup>93</sup> cf. item 39-41 regarding permitted partnership agreements; (Department of Higher Education and Training (DHET), 2016b)

*cooperate ... public and private institutions should cooperate in these spaces so we both don't need to buy expensive equipment because the classes are small. Lecturers – you can't always get them, but if we can host joint seminars, if we can host or prepare joint papers together, both parties can in fact develop.” (Researcher’s insertion)*

Creative solutions and collaborative strategies could alleviate the financial burden and contribute to sustainability and the longevity of institutions. It could be a matter of connecting a private higher education institution with a “comparable” public institution in terms of the programme offers as described above. This could lead to benchmarking quality between public and private providers for improved quality across the sector. It presupposes a level of understanding and trust between the two parties for successful engagement to be achieved. An example of successful engagement is PHEI1 and PHEI3 that utilise their network of public academic associates in their internal quality management processes.

## **5.4 PROGRAMME REACCREDITATION**

### **5.4.1 External programme reaccreditation process**

The CHE participants outlined the external quality assurance process which is documented below. The related registration processes, as relayed by the DHET and SAQA participants, are also explicated. It was indicated that the current process is linear – only once the reaccreditation outcome is known, can the registration process be concluded.

A CHE participant indicated that the earliest record indicates reaccreditation occurring in 2004. If there has been a cycle at least every three years, it means at least six reaccreditation cycles to date. Relying on institutional memory is important if no statistical analysis of the process has been done in this regard.

Receipt of the DHET’s list of institutions for which registration needs to be reviewed catalyses the programme reaccreditation cycle. The DHET does not prescribe the process to be followed but requires a recommendation from the CHE, upon conclusion of the process, as to whether the programmes are still of acceptable quality to ensure public confidence and to allow the Department to “reregister” that institution and its programmes (CHE Participant 2).



The current process, which is under review, commences when the CHE contacts the individual institutions to notify them i) that they need to participate in the reaccreditation process, and ii) participate in a reaccreditation training workshop. Although some institutions might have prior experience of the process, there would be others that need to be inducted. All institutions are expected to attend the workshop regardless of prior experience.

The training involves: i) training on reaccreditation itself, what it is, what the implications are and what the process involves; ii) particular emphasis on what the requirements will be; iii) training on the template itself and how the application will be done; and iv) part of the training must also involve training on the use of the system so that institutions can upload the applications correctly. The templates that need to be completed by the institution are provided and need to be uploaded to the HEQC-Online system. Another preparatory exercise is to survey the institutions. The survey done by the CHE seeks to ensure that only relevant programmes (with a graduated cohort) will be included in the reaccreditation process. If no graduated cohort has been produced, then programme accreditation would simply be extended – and so registration – until the next reaccreditation-cum-registration cycle. CHE Participant 2 indicates that if the programme was not aligned to the HEQSF then the institution would have had the opportunity, until the end of 2019, to enrol new students. Thereafter, those programmes will be in teach-out and there should be no new enrolment. Therefore, during the reaccreditation process in 2021, it would be noted that these programmes are in teach-out (*ibid*).

The survey also seeks to establish that the programme details are correct in terms of the accredited and registered title, NQF level, and the total number of credits. The programme details have to match, i.e. alignment between the CHE record, institutional record and DHET *Register*. If there are any discrepancies following triangulation of the data, these are flagged and addressed between the CHE, institution and DHET, and SAQA if applicable, before commencement of the process.

In preparation for submission of the reaccreditation application(s), the institution is required to do self-evaluation and fill out the templates that form part of the application. This is indicative of how information received from the external

environment impacts the internal environment in an open system to serve as catalyst for the conversion of resources in the throughput process.

CHE Participant 2 posits that self-evaluation is a critical stage in the internal quality assurance process, yet it is regarded as the area in which improvement is needed because “many institutions see this as a compliance exercise”. The participant states that it should be an opportunity for institutions to engage their academics, students, faculties, schools, and departments in a rigorous internal quality assurance review process. This reflexive process should be part of the programme review cycle which could include having external and internal peer reviews, ensuring that students are part of that process, but looking at the programme in its totality – about its funding, planning, its throughput rates, learning and teaching strategies, about the curriculum – a whole host of factors that affect provisioning and to then determine the quality. This would imply that there needs to be participation, and collaborative effort, from all stakeholders and embedded actors in the internal quality management system to do the “quality work” required to produce a quality programme. By involving internal and external stakeholders in the programme review process would mean the flow of information to and from the internal and external environments, the conversion of resources by the relevant structures, and through the related processes, of the internal quality management system in the throughput process to produce the output, i.e. a quality programme that can be considered for reaccreditation.

CHE Participant 2 posits the following:

*“It is more important that is very authentically done so that the outcomes feedback into the improvement cycles that are managed by the institution as part of its quality improvement process. The CHE’s job is actually simply to engage with the institution on the effectiveness of their internal quality assurance mechanisms. It should be a conversation, of reflection and engagement, about: Why did you have these findings? Why did you measure this in the way that you did? What are the implications of these things? So, it’s a very reflective process, because the improvement of quality lies with the institution itself.”*

If the self-evaluation is not an honest reflection that comes to light during the desktop evaluation, then it stands to reason that the site visit would entail greater vigilance<sup>94</sup> as there would be some distrust of the institution's submission.

Once the institution has paid the applicable fee<sup>95</sup>, the applications are put into the process. Firstly, there is a checking process, and desktop research is done on the institution and all its programme offerings. The institutional history is traced in terms of the following: i) when programmes were initially accredited; ii) which programmes were submitted as part of the HEQSF-alignment process; iii) any programme title changes since first accredited or HEQSF-aligned; iv) whether all conditions for accreditation were met; whether all conditions for the previous reaccreditation were met; v) whether site visits had been conducted to the institution and if any conditions that emanated from that proceeding were met; vi) the approved site(s) of delivery for the programme(s); and vii) whether conditions for approval of the site(s) were met. As indicated by a CHE participant, the background seeks to provide information that will be useful to the evaluator because any issues that need to be checked will be flagged. It is also supposed to provide information to the decision-making structures. For example, if it is found that an institution is offering a programme that was not accredited, or a site of delivery was not approved, it must be flagged so that the HEQC can decide how to address the matter and, in turn, address it with the institution. These practices again hark back to the issue of trust which perhaps accounts for the CHE's need for due diligence upon commencement of every process.

Once approved, the background – together with the institution's application(s) – is released to the evaluators who are contracted into the peer-review process. These peers are affiliated with public or private institutions. These evaluators need to, at minimum, have a qualification at least one NQF level higher than the exit level of the programme (at least a bachelor's degree), and need to be qualified and experienced in the subject field relevant to the programme. The programme has to be evaluated in terms of the criteria for programme accreditation and the evaluator is supplied with a template on which the findings need to be documented. In the researcher's opinion, it would be advisable to engage senior academics with at least a doctorate

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<sup>94</sup> CHE Participant 2

<sup>95</sup> See earlier discussion regarding the fee charged for programme reaccreditation.

and a reputable teaching and research track record in the relevant field. It would be advantageous if the evaluator understood the diverse nature and challenges of the private higher education sector for these to be taken into account when the evaluation is done. In doing so, the quality of the peer review might be questioned<sup>96</sup> less.

The evaluator's report on the programme is subject to a rigorous internal approvals process within the relevant directorate of the CHE. Following approval of the evaluation report, a recommendation writer is appointed. The recommendation writer is a peer reviewer contracted from a public or private institution. The recommendation writer reviews the report submitted by the evaluator and based on that report, he/she writes a recommendation on behalf of the Directorate, initially flagging what the concerns may be, and then making a recommendation as to whether the programme should be fully reaccredited, reaccredited with conditions or, if there are serious problems, then the recommendation may be for notice of withdrawal of accreditation, initially, or withdrawal of accreditation. This recommendation, and the evaluation report, are subject to final Directorate approval and will then serve at the Accreditation Committee meeting.

The Accreditation Committee is a sub-committee of the HEQC comprising about 20 experts. These are quality assurance and subject specialists drawn from both public and private institutions, and also representatives from the DHET who work with parallel processes at the Department. A panel of Accreditation Committee members is assigned some programmes or all the programmes of an institution. If it is a large institution that has submitted programmes for reaccreditation, all those programmes will be assigned to the same panel, so that they can look at the institution holistically. All the information is provided to the Accreditation Committee, i.e. it will look at the institution's submission, evaluator's report, and recommendation writer's report. The panel will lead the discussion at the Accreditation Committee meeting and the full sitting will then make a recommendation. Sometimes the Committee requires clarification from the Directorate. The role of the Directorate at that point is to provide the information as requested, or flag any issues of concern.

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<sup>96</sup> See negative comments from participants regarding the evaluation process.

Having had a look at all the documentation, the Accreditation Committee could decide to support the Directorate's recommendation or take a different view to that of the Directorate. It may, for example, decide that a programme should rather be placed on notice of withdrawal of accreditation – whereas the Directorate's recommendation was to reaccredit a programme with conditions – because the Committee regards the matters of concern as serious. The Committee could also decide to defer the programme if there are issues that require clarification by the institution. If that happens, then the programme cannot go through to the next stage. The Directorate must communicate this to the institution and indicate that the reasons for deferral require a response. The institution will be given a month to prepare its response and re-enter the process<sup>97</sup>.

If the Accreditation Committee has decided on the application, it will make a recommendation to the decision-making body, viz. the Higher Education Quality Committee, that the programme should be reaccredited, reaccredited with conditions, or placed on withdrawal of accreditation. The application is then tabled at the meeting of the HEQC. The HEQC will be privy to the same documents that were tabled at the Accreditation Committee meeting. The HEQC will decide on the withdrawal of accreditation, reaccreditation with conditions or full reaccreditation. The HEQC decision is made per programme. If the Accreditation Committee's recommendation was solely based on a desktop evaluation, in other words, a site visit had not been conducted, the HEQC might set the condition of a site visit<sup>98</sup>. Once the site visit is completed, the application will serve again following the same process. It is important to highlight that, whilst the initial evaluation is a desktop exercise based on the information submitted by the institution, the site visit is a verification exercise. As a CHE participant indicated:

*“... it has happened that, in the process of doing the site visit, issues of concern were raised, whilst the programme has already had a positive outcome, for example, and based on the findings of the site visit that outcome can change.”*

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<sup>97</sup> See earlier discussion on the fee charged for deferral.

<sup>98</sup> See earlier discussion on the fee charged for a site visit.

The site visit is regarded as a valuable exercise because the CHE can identify that: i) “there are some good small institutions, and there are also some not-so-good institutions”; ii) although the institution might have good policies in place, “the lecturers have no clue about the provisions of that policy”; or iii) “there's no evidence of academic ownership of the process or the programmes or anything in those institutions” (CHE Participant 1). The participant indicated that the CHE has “some very strong evaluators” who can identify when a “compliance consultant” has been hired to assist the institution with its “tick box exercise” for the CHE. CHE Participant 2 confirms that sometimes institutions use consultants and do not know what is happening themselves.

Site visits have been set for all institutions that are part of the current programme reaccreditation cycle and these will be conducted before finalising the report for the HEQC. This will serve to eliminate any conflicting findings as it has been found that the desktop evaluation might deliver a positive finding, whereas verification through a site visit will find the opposite, or vice versa. The consolidated report “will bring together the findings of the individual programme evaluations, as well as the site visits and we only get one outcome, and if there’s conditions, the conditions will be linked to one process” (CHE Participant 1). As indicated, this would provide a holistic<sup>99</sup> picture of the institution and its programmes, and also serve to reduce costs for the institution if, for example, only one set of conditions becomes applicable. Having all institutions undergo site visits shows consistency of practice, and “the process must also be rigorous enough so that it's fair to institutions that have undergone previous cycles as well” (CHE Participant 1).

CHE Participant 2 notes that although the site visit is a useful mechanism, it has been found that the virtual site visit currently conducted due to COVID-19 restrictions is not ideal. A challenge identified by site visit panels is that, in some cases, there was a strong indication that students who were interviewed were being coached by the institution. A captive audience does not lend credibility to the data.

An additional challenge for the CHE is the selection of the site visit panel. The institution has the right to veto the inclusion of a panel member based on a

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<sup>99</sup> “The outcomes of the programme evaluation as a whole should be determined in a holistic manner and not by merely calculating the sum total of the evaluations against individual criteria.” (CHE, 2004b, as amended)

reasonable objection. CHE Participant 2 indicates that private institutions object to the inclusion of members from other private institutions as they are regarded as business competitors. Sometimes the inclusion of a public institution panellist is not objected to before the site visit but dissatisfaction will be expressed after the site visit is concluded and the outcome made known. The criticism that is often levelled against the panel is that the public institution members do not understand the private higher education context (*ibid*). This may be considered a ploy to register doubt on the site visit findings and the integrity of the process since the institution should have exercised its rights upfront. It is indicative of a lack of openness to the peer-review process or possibly regressive practice if internal self-review does not flow from a site visit and expert peer opinion (whether from public or private origin) is not seen to add value to the process or any form of internal review. In contrast, a participant PHEI employs the strategy of contracting public peers specifically to do reviews:

*“... to get that benchmark<sup>100</sup>, to ensure that we continue to offer quality to the students. It’s not as if it’s reaccredited and everything is fine. It’s only every four, five years. If you look at last year, so many changes just in one year, and you need to make sure that you – each year – close the loop.”* (Lizel)

The Higher Education Act (1997) stipulates that a private higher education institution must ensure its programmes “will maintain acceptable standards that are not inferior to standards at a comparable public higher education institution”. Benchmarking against “public” quality is debatable as, firstly, what would constitute a “comparable” public institution is not defined, and secondly, the denotation of “quality” in a public versus private institution could differ. David, who has an extensive background in public higher education, indicates that in a compliance exercise, a public institution might not have all the “tick-offs”.

*“I’ve evaluated one of those institutions, a programme, and I couldn’t find policies and evidence, but when I talked to the students and I looked at what’s happening, you can see good things are happening.”* (David)

If meeting the accreditation criteria is required, at minimum, for compliance quality, and all the ticks are not evident but “good things are happening”, the question is

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<sup>100</sup> HE Act (Section 53(1)(i), 1997)



whether compliance can disaggregate to “tick-offs”, be a qualitative experience or should it be both. There needs to be checks and balances as well. For instance, tick off if there is a policy framework to guide the process and underpin systems.

After the HEQC makes its decision, the outcome of the reaccreditation process is communicated to the institution. This would be the determination of whether a programme is considered of quality to be retained in the system, i.e. reaccredited. Communication of the outcome thus leads to the absorption of information from the “external environment” by the institution’s “internal environment” for conversion in its internal quality management system. If programme reaccreditation is achieved, the feedback loop is closed.

However, if the HEQC has identified areas of concern these would first need to be addressed. The feedback loop will then only be closed once all conditions have been met, and/or a representation succeeds in achieving a reaccredited programme and/or the improvement plan linked to the notice of withdrawal of accreditation is successfully implemented to achieve a reaccredited programme. The realisation of the desired output (a reaccredited programme) is indicative of a functional, open system. The withdrawal of programme accreditation could indicate a dysfunctional and/or closed system.

If programme reaccreditation is conditional, there will be a term attached to those conditions. Some conditions will need to be addressed in the short term, i.e. the institution will have between three and six months in which to respond and submit evidence that those conditions have been met. If it is a long-term condition, the institution is given six months to a year to submit a response on those conditions, again with evidence. PHEI1 participant, David, indicates that the peer-review process can show signs of “over-regulation” if an evaluator becomes prescriptive. Evaluator bias can present a barrier for achieving compliance if a condition for (re)accreditation emanates from evaluative judgement. The participant opines that the evaluator’s role is to consider whether the programme is acceptable according to the criteria and to consider the value of the institution’s contribution. In the researcher’s opinion, the quality of the institution’s submission, which includes the evidence, will dictate whether the programme is deemed acceptable per the criteria.

Non-submission of evidence could be described as a barrier for institutions to achieve compliance:

*“The problem that we find, is that sometimes institutions would like the CHE to take its word alone, which unfortunately ... is not acceptable because the peer evaluation is evidence-based ... So, whilst we use templates and we send templates to institutions, the institutions cannot just fill those templates and submit. They must also submit evidence to support their claims. Similarly, we also insist with evaluators, if they say there are serious concerns, they must cite specific references ... They must point out what the weaknesses are against the criteria for accreditation.”* (CHE Participant 1)

It is clear the HEQC requires accurate information and supporting evidence to make an informed decision about the accreditation status of a programme. Therefore, when there are conditions for reaccreditation that requires a response, the institution must also submit evidence.

*“If the issue was with a particular element missing from their assessment policy, there must be evidence that the policy has been revised... They must submit as evidence, for example, a revised policy and evidence that it has gone through approval, it is a final policy that has been approved. For example, minutes of the meeting where it was approved and, also, it must be clear in the policy, what the revision cycle of the policy and so on is, so it can't just be a case of “we have met this condition because this is what we have done.”* (CHE Participant 1)

The institution thus has to accept partial responsibility for any delay<sup>101</sup> in concluding the reaccreditation process if its submission lacks vital information for an outcome to be reached. It has also been found that some institutions plagiarise content from the Web or another institution (CHE Participant 2). The participant indicates that site visits remain the best form of verification.

If there is a negative outcome, the institution is notified of the intended withdrawal of programme accreditation and provided an opportunity to submit a representation

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<sup>101</sup> See DHET's indication (in the following discussion) of the “problem”/“big challenge” it experiences in concluding the registration process.

within 21 (working) days of receipt of the outcome. CHE Participant 2 explained that the institution may not continue to offer the programme once accreditation has been withdrawn. However, this is subject to the timing of communication on the outcome. As indicated:

*“If the accreditation is withdrawn towards the latter part of the year<sup>102</sup>, for example, the institution may still recruit and enrol students because the representation has not been heard and there isn't a final decision of the HEQC about it.”*

The institution must provide a response to the reasons for withdrawal of accreditation, supported by evidence. The representation incurs payment<sup>103</sup> before being processed. The representation follows the usual peer-review process: evaluation, recommendation writing, tabling at the Accreditation Committee meeting and then it serves at the HEQC meeting. The representation is regarded as the institution's final chance to address the concerns identified by the HEQC. However, the Accreditation Committee may decide to place the institution on an improvement plan, in which case it will recommend to the HEQC that the institution should not be allowed to enrol any new students on the programme and that it be given a stipulated timeframe to make improvements to the programme. The institution is thus required to consider the issues of concern and address these through the implementation of the improvement plan.

Within a month of communication on the outcome, the institution is required to submit a plan that states what they intend to do about each point of concern, and then every month after that for the next five months, they submit a report on progress made regarding the implementation of the improvement plan, with supporting evidence. At the end of the six months, all the information that the institution submitted, that is the improvement plan, progress reports and all the supporting evidence, is made available to a site visit panel that will conduct the site visit to the relevant site(s) of delivery.

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<sup>102</sup> Note that the HEQC convenes about five times per year (at least once per quarter), with the last meeting usually scheduled in November.

<sup>103</sup> See earlier discussion on the fee charged per representation.

Through the site visit, it is verified whether the concerns of the HEQC have been addressed adequately, which could lead to the programme being fully reaccredited, or reaccredited with conditions. The outcome could also be that the issues remain a serious concern in that they were not adequately addressed, and that accreditation must be withdrawn. In some cases, all the institution's programmes are of poor quality and accreditation needs to be withdrawn for all. Accreditation could also be withdrawn if the programme is not offered at the correct NQF level, as cited by CHE Participant 2:

*“It could be, for example, that they’re offering it at the wrong NQF level and the wrong credits where they’ve not been accredited to offer it as such, and we’ve got cases like that.”*

The NQF level descriptors<sup>104</sup> specify ten competencies that graduates are expected to acquire at each of the ten NQF levels. Offering the programme at the incorrect level implies that *inter alia* learning and teaching, assessment, module outcomes, and/or exit level outcomes are pitched at the incorrect level which means that the graduate will have a serious deficit in terms of applied competence<sup>105</sup>.

The requirement for an improvement plan and satisfactory implementation thereof to achieve compliance is indicative of an attempt by the CHE to work closer with institutions for development and quality promotion. However, a period of six months to conceptualise an improvement plan, and to implement and effect improvement might not be sufficient – if the concerns that led to this action are deemed serious. It is my opinion that the fact that the institution could not identify these deficiencies internally is testimony to a lack of capacity and/or immature quality management process. Presuming there is a deficit would imply that the institution needs support, which is not provided by the CHE through its current programme reaccreditation process. As indicated by a CHE participant:

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<sup>104</sup> (South African Qualifications Authority (SAQA), 2012)

<sup>105</sup> “Applied competence has three constituent elements: foundational competence embraces the intellectual/academic skills of knowledge together with analysis, synthesis and evaluation, which includes information processing and problem solving; practical competence includes the concept of operational context; and reflexive competence incorporates learner autonomy.” (South African Qualifications Authority (SAQA), 2012)

*“At present, there has been no process to allow for any engagement with an institution on their improvement plan, except to acknowledge it and to keep it on file until the time of the site visit.”*

CHE Participant 1 goes further to state that the lack of support is acknowledged, and that revision of the improvement plan is underway; a proposal will be forthcoming on how to manage the process going forward:

*“... the process is peer-driven, so even when, as a Directorate, we can see that there are concerns, we were not in a position to communicate this to the institution, because we have no process of doing this. It is only upon receipt of the final progress report and the site visit that we can give access to a panel of evaluators to look at this information and then it will follow the process of a site visit report but, as a Directorate, we have picked up that this is a concern and so at management level, there's been a suggestion to review the way we do improvement plans, especially given that with the quality assurance framework that is coming in and the shift towards a more developmental and supportive way of engaging with institutions. We have come to the realisation that improvement plans are becoming, are going to become, more important which means, as we review our processes, we also have to look at them.”*

The participant indicates that the CHE does not provide any guidance to institutions as to what an improvement plan should look like. The institution is required to design such a plan and make these improvements itself. This would presuppose a functional open system wherein the information received from the external environment is channelled successfully by the role-players to the throughput process for adequate and appropriate conversion of resources to achieve the desired output. The implication is that if capacity is lacking, it stands to reason that the institution might call in the assistance of other parties (presumably at a cost) to design a plan on its behalf or submit its own most likely poorly conceptualised plan. It could very well be that a good plan is designed but implementation thereof is found wanting. This would be indicative of a system that is not fully functional despite it presenting as an open system. Recognition of the deficit in the system could lead to the employment of actors that can do the required “quality work” as illustrated, for example, in the employment of Len (PHEI3) and other staff in embedded quality

management roles instead of utilising the services of consultants on an *ad hoc* basis (see Chapter 6).

The programme reaccreditation process is designed for accountability, and thus capacity-building and support mechanisms need to be built in elsewhere to inform and support the improvement plan and its implementation. Since the current programme reaccreditation process will not be applicable in 2022<sup>106</sup>, it is superfluous to recommend a review of timeframes or processes at this point. Therefore, a future audit and/or quality review process<sup>107</sup> that will replace the current one will need to consider a support/intervention approach. The intervention process would be well served by the CHE's quality promotion unit – in collaboration with the relevant quality assurance unit – perhaps through a Community of Practice that works across quality assurance functions.

CHE Participant 1 believes that there should be a mid-term process – within the timeframe allowed for improvement – for a peer review panel to provide feedback at that point. The participant indicates that sometimes institutions can effect improvement in less time than stipulated. However, a barrier to achieving compliance in a shorter space of time exists because the responsible Directorate cannot intervene in the process as it does not have any authority to do so<sup>108</sup>. The stipulated timeframe is a standard timeframe set across the board for all programmes on an improvement plan, and a site visit panel will only be despatched once the timeframe has lapsed. This proves to be a challenge for the institution that complies within a short space of time and seeks to enrol new students on a programme but is prohibited from doing so:

*“... in some cases, the issues are a matter of submitting a policy, for example, and institutions sometimes have come back and said, ‘You know what – we admit that this was a concern but we do not agree that we need to wait for six months, because we can do this. We can submit this policy within two months, for example, but we don't have a process that says, we can then stop*

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<sup>106</sup> See further discussion around the CHE's institutional audits and the QAF.

<sup>107</sup> See further discussion in this chapter on the way forward.

<sup>108</sup> See comment on previous page re process in this regard.

*and then in two months accept that as the final report and do a site visit or even give them some feedback ...”*

The participant believes that a mid-term process that reaches a positive conclusion would enable institutions to continue marketing and enrol students. The suggestion of an interim process is reasonable since institutions are dependent on tuition fees and if they have complied with the relevant criteria there should be no reason not to lift the restriction. Another way to approach this dilemma would be to take a differentiated approach to the timeframes set depending on the number of programmes, number of concerns and the seriousness thereof.

CHE Participant 1 regards the current virtual site visits, which have been implemented as a result of COVID-19 restrictions, as beneficial in the sense that logistic arrangements are not applicable, and costs have been significantly reduced. This would be advantageous for institutions that have a programme(s) on an improvement plan:

*“The one thing that COVID has done, is to force us to innovate and so we have shifted more to virtual site visits which come with a significant cost reduction for institutions, and ... they also provide for more flexibility for us as well as we prepare for site visits because there are no logistics to prepare for. So, this is a powerful tool and we can leverage on that ... it would not be too much of an ask to ask them to pay for an interim site visit ...”*

It is evident that the CHE is willing to review its processes but whether private higher education institutions would be amenable to these changes remains to be seen. Any change might be viewed as an additional cost and added complexity. It might be worthwhile to workshop these proposals before the commencement of institutional audits for private higher education institutions in 2022, and before implementation of the “confirmation of accreditation” process in the new QAF. The Institutional Audit Committee of the CHE would have to decide whether an improvement plan is a valuable exercise and, if not, alternatives would need to be proposed on how intervention and support can complement the process. The DHET’s indication of under-resourced Quality Councils<sup>109</sup> leads to the question as to whether there is the

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<sup>109</sup> White Paper for Post-School Education and Training; RSA, 2013, p.43



capacity for oversight of an (additional) process that has essentially been created because a gap was identified, or if the CHE should return to the drawing board and rethink this process that seems to be flawed in several ways.

As CHE Participant 3 indicates, in the monthly progress reports, institutions profess to make improvements without providing evidence or the claims are disproved through the site visit. By being facetious it appears that some institutions are not taking the improvement plan seriously, thus undermining the purpose of addressing serious quality concerns. CHE Participant 3 iterates that the improvement plan is intended for developmental purposes, providing the institution sufficient time to improve the quality of its programme provisioning, and that the site visit is included as an accountability measure. However, despite the CHE's intention to assist the institution, having established that there is no support provided during this period, the idea of it being developmental is moot. As it moves towards the implementation of the QAF, the current institutional audits will serve as an interim process linked to reaccreditation. Thus, it is the opportune time to configure new and differentiated, constructive approaches to quality promotion and capacity building that can make a difference in real terms leading up to the implementation of the QAF and thereafter. As indicated earlier, external quality assurance would address issues of accountability while a supportive function needs to be in place separately – upfront and as a parallel process.

A gap between the accreditation and registration processes was noted by CHE Participant 1, who indicated the following:

*“The issue is that institutions are expected to review their programmes and as they do, they make changes. There is currently no process for communicating these changes to SAQA.”*

This would mean that the qualification document that is published on the SAQA website remains static. If not updated, students and employers and other stakeholders are not correctly informed about the qualification and misconceptions could arise about the currency of the qualification, and the knowledge and skills that a graduate would have acquired, and so forth. A process between the CHE and SAQA would need to be in place to incorporate updated information following programme review. The CHE participant proffers the view that, if such a process had

been in place, changes that exceed 50% of the programme would be flagged and the need for a new (replacement) programme become apparent. The concern warrants consideration as it could also present as a barrier for the institution to achieve compliance in the form of a reaccredited programme:

*“One or two institutions ... said it's not their fault, because ... they are expected to review their programmes, and these changes were made for previous reaccreditation cycles and then at some point, the CHE then says this is a major change, and therefore we cannot reaccredit this programme because it looks so different from what was reaccredited and part of that is because of this gap between CHE and SAQA because had there been a process of capturing the changes as institutions make them and them being captured at SAQA, it may have been avoided.”*

There is thus a need for a process within the CHE to record these changes that have to be communicated to SAQA. The above issue is illustrative, once again, of a lack of capacity or immature quality management processes within an institution. If the process is followed correctly, and there is proper oversight and documentary evidence of revision made to a programme during scheduled programme review periods, the issue of >50% revision would be identified. This could point to a lack of knowledge regarding regulatory requirements, e.g. the stipulation by SAQA that “significant changes” to a qualification that exceed 50% require a new (replacement) qualification to be designed (SAQA, 2020, pp 14-15). The fact that more than 50% revision is required is indicative that the programme probably no longer serves its purpose. In the researcher’s opinion, institutional self-evaluation should highlight issues such as these. PHEI1 has such a process in place whereby the faculty documents all changes upon review which is then approved:

*“They had to get the original HEQC submission. They had to write down the important aspects, for example, the outcomes, assessment criteria ... then they have to compare that with the current programme and look at the modules, the curriculum. What has changed and what was the reason for the change? So, we minute all of that. That's part of the Faculty Board minutes, and I'll also present that at Senate... I tried to pull that into a system that we*

*know where we are and building strong guidelines that no one can change anything without going through the processes of approval.” (David)*

As discussed above, significant change to a programme that constitutes more than 50% of the original application for accreditation, would necessitate a new programme to be designed. This would be one reason why an existing programme is not reaccredited, although an institution could argue that there are no guidelines to set parameters for the “50%”. Other reasons for non-reaccreditation (that is, not achieving compliance), according to CHE Participant 1, include programme-specific and institutional concerns: i) programme design weaknesses, e.g. exit level outcomes not being appropriate for the NQF level or the programme is not aligned to the requirements of a professional body which could hamper registration for practising purposes; ii) staffing issues, such as a high turnover rate which affects delivery of the programme; iii) concerns regarding infrastructure; iv) issues about work-integrated learning; v) lack of a credible structure for quality assurance; vi) concerns about programme coordination; vii) issues regarding assessment practices; viii) no evidence of a credible system for assessment and moderation; and ix) little or no evidence of internal academic leadership in the programme as a result of heavy reliance on external consultants (thus lack of institutional capacity). The participant cited the example of an institution where it seemed lecturers were replaced every three months; therefore there was no continuity.

It was confirmed that the institution would receive several opportunities to address the concerns. For example, in some cases, the reaccreditation outcome is deferred following the initial application for programme reaccreditation. Following the institution’s response to the reasons for deferral, the issues remain prevalent, and the programme is not reaccredited. The institution is then provided with an opportunity to submit a presentation. If the issues reoccur, accreditation is ultimately withdrawn. It is noted that essentially there could be three or four opportunities to address concerns if notice of withdrawal of accreditation and an improvement plan are factored in. The participant proffers the view that at some point, the line has to be drawn and the Quality Council needs to take a firm stance:

*“How long can the cycle be perpetuated? At some point, a decision has to be made to protect the students and I think the CHE has not been shy about making that decision when it has to be made.”*

The persistent inability to achieve compliance is illustrative of an institution that finds itself out of its depth and thus needs to reconsider its role and function within the higher education sector. The brand name<sup>110</sup> would sustain reputational damage if the accreditation of programme(s) is withdrawn, which does not bode well for longevity in the sector.

Withdrawal of accreditation has serious consequences for institutions, particularly in terms of financial loss, and they are thus “very quick to go the litigation route” (CHE Participant 2). The participant further indicates that:

*“They’ve also learned that they can wrap the CHE up in litigation for a long period of time because it takes a long time for the cases to be heard in the High Court. You find that a case could drag on for three to four years.”*

CHE participant 3 states that the DHET and SAQA require confirmation that litigation has been concluded before action is taken on the CHE’s recommendation to deregister a qualification. The participant expounded on the fact that private providers take advantage of a protracted court case, and dissonance in regulatory processes<sup>111</sup>, to continue to enrol students on a programme that is no longer accredited. The loopholes in the system and/or process allow this:

*“... the CHE has had experiences where, for example, an institution has taken the CHE, usually with DHET, and it’s happened in a case or two with SAQA, as respondents and basically tied up the regulators in litigation and, in the interim, they continue to offer those programmes, under the guise that the matter is sub judice... for those institutions that have the financial muscle to ... basically keep the matter in court as long as possible, the institutions continue to offer those programmes. In fact, in one or two cases, they even attempted to say, ‘We recognise that you’ve deregistered, you’ve withdrawn*

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<sup>110</sup> cf. Chapter 2 and the discussion around educational brands.

<sup>111</sup> See further discussion in this chapter regarding litigation.

*accreditation of those programmes to x sites, but we still think we have a right to offer them at other sites that are not covered by the site visit.”*

The apparent disregard for the student’s well-being, and his/her opportunity for further study or employment upon graduation, on a non-accredited programme, is tantamount to deliberately selling a faulty product. In terms of the institution as a business enterprise and terms of consumerism, no consumer would stand being deceived. However, there is no “warranty”, “after-sales care” or Ombudsman in higher education that could attend to reparation.

The CHE’s processes need to be comprehensive and water-tight if it wishes to hold an institution to account and thereby protect the interest of students. For example, it might be considered unreasonable to withdraw the accreditation of a programme if only five sites are visited yet the programme is offered across ten sites. Granted, if it is a concern regarding programme design, for instance, the weakness identified is inherent no matter on which site the programme is offered. However, if there are other concerns, such as infrastructure or staffing at an institutional level, it does not necessarily mean that the shortcoming is replicated across sites. If the CHE process is evidence-based then evidence must be gathered at all the relevant sites of delivery for that specific programme. Findings cannot be assumed transferable, and if a site visit is conducted for purposes of verification, then the verification exercise should extend to all sites. The counterargument could be that the programme should be offered across all sites as accredited, therefore, if the institution made a “promise”<sup>112</sup> in its application that there would be ten dedicated teaching staff, for example, this would need to hold true across all sites of delivery. Thus there should be parity of provision which, in turn, implies that if the “promise” in terms of the staffing model has been broken at one or a few sites (out of perhaps ten) there would be no need to verify on all sites.

Even if the litigious institution believes itself to have a valid reason to take this course of action and has the constitutional right to do so, it is the researcher’s opinion that it is a matter of ethics and good governance<sup>113</sup> to be transparent towards stakeholders

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<sup>112</sup> CHE Participant 2 indicated that the initial (desktop) application is essentially a “promise”/an intention to deliver as described in the application. Thus a site visit would serve to verify, in basic terms, whether the institution has followed through on its promise.

<sup>113</sup> See King IV Report (2016, p.12, 25 and 43-46) regarding ethical conduct within and by the organisation.

regarding the status of a programme on offer. In all fairness to the student, there should be transparency about the reaccreditation process and outcome. Not doing so places the student at risk and infringes his/her constitutional right under Section 32(1)(b) of the Constitution (RSA, 1996), i.e. that everyone has the right of access to “any information that is held by another person and that is required for the exercise or protection of any rights”, and Section 33(2): “Everyone whose rights have been adversely affected by administrative action has the right to be given written reasons”. This underscores why students should be educated on and included in the quality assurance processes<sup>114</sup>. If educated, the right questions can be asked, and an appropriate decision made<sup>115</sup>. In terms of its marketing materials and programme information provided in advertising and public documents for use by prospective students, the institution may not provide “fraudulent, false or misleading information” or else its registration will be withdrawn (Section 17(1)(b)(ii); DHET, 2016). The question arises of how these programmes, for which accreditation has been withdrawn, are presented to the public.

Bhengu *et al.* (2006) argue that:

*“If a qualification certificate is viewed by students as a license to a better life, it can be argued that students graduating from poor programmes have been betrayed in relation to a better life promise ... The question that remains unanswered is ‘what would eventually happen in relation to the academic worth of these programmes if there was no external intervention?’”*

If the CHE withdraws accreditation of a programme due to it being of sub-standard quality following a peer-reviewed, evidence-based process, it is unclear why there should be reluctance or hesitancy from fellow regulators to proceed with deregistration. The decision of the HEQC should carry weight as mandated by Section 5 and 7 of the Higher Education Act (1997, as amended) to perform, on behalf of the CHE, the function of quality assurance in the higher education sector. This could be illustrative of a lack of trust between the authorities or, at minimum, a lack of collaboration and integration. If there is openness, transparency, collaboration, and collegial relations then uniform action can be promoted. All

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<sup>114</sup> cf. Saidi, 2020

<sup>115</sup> Students need to operationalise the resources at their disposal for agency.

regulators, including the CHE and its standing committee the HEQC, should do self-evaluation (as it has undertaken to do<sup>116</sup> every five years) and peer review of its sub-committees so that its “quality work” is enhanced through reflexive practice. There should be a fixed term of office for committee members, including external peers (similar to that for external moderators at an institution), for new and fresh perspectives to be brought on board, and prevent stagnating or ineffective processes from being followed in perpetuity. A critical core group should be retained at each rotation for continuity and should be released in the next round.

The indication that litigious private higher education institutions have “tied up the regulators in litigation” and “basically keep the matter in court as long as possible” (see discussion above) is cause for concern because it has serious implications for the student’s educational experience. Once the matter becomes *sub judice*, all relevant parties cloak themselves in this phrase while students continue to enrol on a sub-standard programme. This leads one to the question of whose interest is being served: the litigious institution, hesitant regulator, or suffering student. The student is being short-changed on a programme that is of poor quality if the definition of “quality” as “value for money”<sup>117</sup> is considered. CHE Participant 3 posits that the CHE should be consistent in its feedback to institutions concerning the withdrawal of programme accreditation. If the latter is enforced then the stipulation that no new enrolments may be made should be standard.

#### **5.4.2 The registration process**

Upon conclusion of the process, the CHE notifies the DHET of the programme reaccreditation outcome per institution. If there is a positive outcome, the DHET process is concluded with the issuance of a certificate of registration<sup>118</sup>, in other words, an amendment of registration for an already registered institution. The certificate reflects all the accredited programmes that the institution may offer.

As indicated previously, the external programme reaccreditation process is directly linked to the DHET’s amendment of registration (“reregistration”) cycle which usually occurs on a three- to four-year cyclical basis. The DHET participant indicates that the

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<sup>116</sup> (Council on Higher Education (CHE), 2009)

<sup>117</sup> cf. QAF (CHE, 2021a, p.29-30); Bhengu *et al.* (2006); Harvey & Green (1993)

<sup>118</sup> If it is an applicant institution, the first certificate of registration is issued following accreditation of a new programme(s).



timeframes have been increased to six or seven years. An institution is subject to “reregistration” (and thus programme reaccreditation) within a three-, five-, six- or seven-year cycle. The three-year cycle applies only to newly registered institutions where they are given provisional registration within a cycle of three years, which is the period given to them to demonstrate that they have the ability and capacity to operate an institution of higher learning. At the end of the three-year period, when a cohort of students has been produced, the CHE is then in a position to evaluate the programme for reaccreditation and, if the programme meets all the requirements, it is reaccredited and the registration is finalised.

Accreditation is a prerequisite for initial registration. The same applies to “reregistration”. The term “reregistration” as commonly used is not the correct terminology. As explained by the DHET participant:

*“We don't really use the word reregistration. What we say, is that the institution remains registered, and the registration is amended to give it a new registration cycle and that new registration cycle basically depends on two issues: one, is the reaccreditation by the CHE; the second is the submission of a complete annual report. In other words, that the institution continues to meet its obligations as an institution of higher learning as detailed in Chapter six of the Regulations. That would include financial viability, maintenance of a guarantee, the health and safety report, the dissemination and advertising of information that is correct and in line with the regulations. In other words, there is no misrepresentation of qualifications, that the programmes remain accredited with the CHE and registered on the NQF.”*

The amendment of registration is thus dependent, *inter alia*, on a positive programme reaccreditation outcome. The DHET participant indicated that the following trends have been identified over the past three to four years: i) Normally “reaccreditation goes through very quickly” for institutions that offer a few programmes; ii) the bigger institutions, with a larger number of programmes, will have some programmes reaccredited, others deferred or withdrawn, and deferred again; and iii) some institutions continuously do not know, or cannot adhere to, the requirements for reaccreditation. This “creates a problem in the administration of the

process” and presents a “big challenge”<sup>119</sup>. The DHET has to wait for the process to conclude with the CHE before any steps can be taken in terms of registration.

Once the CHE has concluded its quality assurance process and the programme is reaccredited (or reaccredited with conditions), it also recommends to SAQA that the qualification should be reregistered on the NQF. When a qualification is registered for the first time, it is evaluated by SAQA to determine whether it meets the criteria for registration on the NQF. The reaccredited qualification undergoes an evaluation process as well.

SAQA has its own registration timeframes that do not necessarily coincide with the registration timeframes of the DHET or reaccreditation timeframes of the CHE. The SAQA participants indicated that HEQSF qualifications are registered for three years. The reregistration of a qualification on the NQF is not a given after the expiry of the three-year registration period<sup>120</sup> or upon recommendation by the CHE following the conclusion of a reaccreditation cycle. As one SAQA participant stated:

*“I know it was done like that in 2018<sup>121</sup>. But the first thing that we need to check, is whether it meets the policy and criteria because that's very crucial. You don't want to have, and you don't want to reregister a qualification that does not meet the requirements. So, in terms of that, we need to check that first and if there is information that we need, we just request that information.”*

The registration of a higher education qualification expires on 30 June every three years<sup>122</sup> and SAQA would need to notify the CHE in advance of qualifications that need to be reviewed for reregistration. In the past, SAQA's automatic reregistration of qualifications included those that did not measure up to the quality and registration criteria which meant that institutions could continue to offer those and enrol students. One of the SAQA participants stated that “A trend that they did in the past ... is that it's a blanket reregistration of qualifications. And then when they look at the

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<sup>119</sup> See earlier discussion regarding the evidence-based process of the CHE.

<sup>120</sup> cf. Section 23 of the *Policy and Criteria for the Registration of Qualifications and Part-qualifications on the National Qualifications Framework* (SAQA, as amended 2020, p.14)

<sup>121</sup> The participant referred to the fact that in 2018, and prior, qualifications were automatically reregistered following expiry of the three-year registration period, i.e. “REGISTRATION END DATE”

(<https://allqs.saga.org.za/>).

<sup>122</sup> <https://allqs.saga.org.za/>

qualification again, the content is outdated, obsolete and things like that”. It is, however, noted by the participant that:

*“When you look at private education, I think that in my opinion, and it's my opinion, that they are more willing to review their qualifications, making sure it's up to date and in line with new developments outside than public institutions. So they are more willing then to correct their qualifications for registration on the NQF.”*

As indicated by the fellow SAQA participant, it was also found that “some institutions didn't even have students, even since 2018”, which is one of the reasons why SAQA requires a review of a qualification before reregistration (Section 27b-d, SAQA, 2020). Essentially, these qualifications were “shelved”. If an institution were to resuscitate a dormant qualification, it could have implications for the quality thereof because it would be unlikely that any programme review would have been done during the dormant period which makes the programme's fitness for purpose questionable.

The participant finds it important that there should be synchronicity between the CHE reaccreditation, DHET registration and SAQA reregistration timeframes. The endeavour to synchronise confirmation of accreditation (“reaccreditation”), under the new QAF and reregistration timeframes could prove to be labour intensive and would require careful orchestration on both the QC and SAQA's side. The SAQA participant takes cognisance of this:

*“Remember that in 2018 it was a blanket reregistration up to 2021. All those that have been registered from 2018 to 2021 – those will be simple in terms of managing that on the same period but the qualifications that were registered after June 2018 ... It means SAQA will have to keep tabs (on) what is happening so that we can be able to notify the QC ... It's going to be a lot of work.”*

The harmonisation between the three entities in this regard would require careful planning, considering that qualification types are varied in terms of minimum duration, e.g. a Higher Certificate of one year as opposed to a bachelor's degree of three years. Adding to the complexity is the intention to grant accreditation (and confirmation of accreditation) for a fixed period depending on the maturity of

institutional quality assurance systems to deliver credible self-evaluation reports and the track record of the institution (CHE, 2021a, p.42 & 54). There will thus be differentiated accreditation timeframes per institution. Planning towards the implementation of the QAF will have to factor in these considerations at the operational level. A dedicated project management unit might be necessary. A management information system that can be shared between the three parties for input and retrieval of readily accessible data would enable streamlining and efficiencies in this regard (CHE, 2021a, p.62).

If there is the withdrawal of accreditation for a programme, the onus is on the CHE to inform SAQA that the qualification<sup>123</sup> is no longer accredited. Then SAQA can take the next step, which would be to deregister that particular qualification. “If it’s deregistered, it’s still on the NQF if it was offered, and learners who obtained it still have the qualification” (SAQA participant).

For the process of deregistration, SAQA considers whether there are students in the qualification pipeline. One of the SAQA participants indicated:

*“... that’s what we check – whether there are students on the register, on the qualification. Are they going to be safe? Would they be able to complete the qualification and all those kind of things? And then we would take it to the committee, to the Q and S<sup>124</sup>, and then finally to the SAQA Board<sup>125</sup> or EXCO.”*

Furthermore, before deregistration:

*“We always want confirmation from (the) QC whether there are legal issues that are pending before we deregister and that’s one of the requirements, that we will request from the QC, and it’s also part of the policy that all the deregistration must be ... that there must not be any legal issues that are pending. Meaning that our understanding is that this request must have been dealt with between the QC and the provider before it comes to SAQA ...*

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<sup>123</sup> Currently, there is a 1:1 relationship between a programme and a qualification.

<sup>124</sup> The “Q and S” is the Qualifications and Standards Committee that reviews applications for registration and recommends registration to the SAQA Board (or its Executive Committee).

<sup>125</sup> The SAQA Board is a formally constituted body that governs SAQA as mandated by the NQF Act of 2008 (Section 14) which comprises 12 members appointed in their personal capacity by the Minister, the Chief Executive Officer of SAQA and each Quality Council, among other.

*Because if we really say we are going to go ahead and deregister the qualification while there's still a legal issue pending, it means then SAQA will become party to that legal challenge that already has started with the provider. It means SAQA is also open to legal challenge as such.”*

SAQA is acutely aware of the current litigious environment. SAQA is taking preventative measures not to be embroiled in litigation along with the Quality Council as indicated by the participant:

*“... there were some cases where SAQA was to be sued in terms of that because there were legal issues with the QC. It's really to limit the legal exposure of SAQA.”*

If a programme is deemed to be of poor quality by the CHE and accreditation is withdrawn, it may continue to be offered until the pipeline students graduate. No new student enrolments should be done on a non-accredited programme. Usually, existing students are taught out within the timeframe from “Last Date for Enrolment” to “Last Date for Achievement” on the  $n+2$  registration formula ( $n$ = “length of the qualification”) (Section 30; SAQA, 2020; <https://allqs.saqa.org.za/>). As explained by a SAQA participant:

*“And then the last date of achievement is when learners do have time to complete the qualification, that's normally another three years. So if they say for example ... 2021 is last date of registration, then they can still take learners in 2022. And learners need to complete by 2025.”*

Litigation can become a protracted process<sup>126</sup> (cf. <http://www.saflii.org/za/cases/ZAGPPHC/2019/963.html>), therefore, by not considering an interim measure and retaining the registered qualification, the institution can take advantage of the dissonance between the regulators and continue to enrol students. Distancing (or “shielding”) itself and being non-committal under these circumstances creates a problem. The unsuspecting student is in the middle of this dispute and at a disadvantage in such a scenario. Not only is there dissonance between the authorities, but dissonance with the *Policy and Criteria for*

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<sup>126</sup> See earlier discussion regarding litigation and protecting the interest of the student.

*the Registration of Qualifications and Part-qualifications on the National Qualifications Framework (SAQA, 2020) for the following reasons:*

- i) Section 11(e) indicates an objective of the *Policy and Criteria* which is to “promote public understanding of, and trust in, the NQF through the registration of **quality-assured**, nationally relevant and internationally comparable qualifications...” (Researcher’s emphasis). If the Quality Council, through withdrawal of accreditation, signals that the quality of the qualification is below standard, then this objective is not met. The public needs to be made aware of the Quality Council’s reservations about the qualification. The regulatory processes are interlinked, and there should be collaborative effort to engender trust in the NQF, as well as collaborative effort to advance the objectives of the NQF (as mandated by the NQF Act, 2008, under section 13(f)(i)). There could be provisional registration until judgement is passed by the Court, or other sanction. This would be in accordance with Section 34 of the *Policy and Criteria*.
- ii) Section 34 indicates that “Information on qualifications and part-qualifications, unless prohibited by law, must be accurate and transparent and be made available to the public”. The legal prohibition is not clear. As per Section 13(n) of the NQF Act, SAQA is mandated to “inform the public about the NQF”.
- iii) Section 36 of the *Policy and Criteria* requires the Quality Council to ensure that the publication of information on qualifications in its sub-framework is consistent with information published on the NQF and that, under Section 36(a), the public is protected against misleading information about qualifications. A literal interpretation of this is that both the Quality Council and SAQA are obligated to be transparent to serve the public interest.

One SAQA participant advocated a collaborative approach for addressing the disjuncture:

*“Providers may say, ‘But look, I’m still registered. There is a registered qualification under my name but you de-accredited me’. So they will still go on and teach the qualification. That’s why I said that ... **if they involve SAQA from the beginning, to say that we are going to de-accredit<sup>127</sup> this***

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<sup>127</sup> withdrawal of accreditation

***provider and be careful, it might lead to a legal issue, so that we understand ... that we know about that, that we can follow that and making sure that we (do) not disadvantage the Quality Council in not deregistering that qualification because I know that it happens ... if there's a legal action against each other, we need to know about that so that we don't put CHE in a situation or the provider in a better position to negotiate with CHE.***

(Researcher's emphasis)

The participant used an apt analogy to describe the importance of the collaborative approach:

*"The same thing that when you speak about DHET, they are registered with DHET but deregistered by SAQA, de-accredited by CHE, but they say we are still registered, we can still offer qualifications. And I think that that is also an issue ... it's like a stool with three legs. If you take one leg away, then this stool is not functioning."*

It is clear that if the authorities do not present a united front, the regulatory system is not as effective as it should be to realise its legislated objectives, and the public interest is not well served. The authorities will be faced with more challenges that could see one being played off against the other by opportunistic entities.

When compared with SAQA's registration process, it is noted that the DHET does not immediately withdraw a programme from the registration certificate if accreditation has been withdrawn. As explained by the DHET participant:

*"If the accreditation is withdrawn, we do not go into cancellation. We don't do anything immediately because we wait for the process to conclude with the CHE. When the CHE finally withdraws accreditation, they are required to inform SAQA to deregister the qualification from the NQF. Then, at that point, our processes kick in... we'll issue a notice of intent to cancel. If it's all programmes, then the registration of the institution must go into cancellation. If it's one or two programmes, then those programmes need to be discontinued, deregistered, and before we do that, we do communicate with the institution to say these are the steps going forward. If they have any objections, they need to deal with it then."*



In the case where an institution has taken legal action against the CHE following a negative programme reaccreditation outcome, the DHET institutes an interim measure<sup>128</sup> until the Court has passed judgement:

*“For example, like with the (Institution’s) case. What they said to us is that there’s a case with the CHE, which is in the High Court, which the CHE verified with us anyway. We then issued a new certificate, but we separated those programmes that were de-accredited and listed them separately.”*  
(Researcher’s insertion)

The Regulations of the DHET (2016) make provision for “teach-out” of students when a programme is deregistered:

*“Where there are students in the system, these students are treated as pipeline students and the institution would be given an opportunity, at least six months or up to the end of the academic year, to phase out but before they even go that route, they have to inform students that the registration’s cancelled. Students must be given the chance to exit and to claim for a refund where it’s lawfully due to them and the institution as well is required to make the effort to transfer students to a recognised public or private institution.”*

It stands to reason that these circumstances could cause great inconvenience to the student and possibly discontinuity of study. The CHE does not play an oversight role during teach-out (CHE Participant 2). The participant shares concern about pipeline students that are in a teach-out programme:

*“Often lecturers would leave, and the facilities may not be good, the quality of the learning and teaching deteriorates and, so, those students could be coming out with a very weak learning experience and with very poor competencies.”*

As indicated by the DHET participant:

*“I don’t think at that stage you can provide oversight over quality because already the quality is so bad that the accreditation has to be withdrawn... from our side, what we would look at is to ensure that the institution is operational*

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<sup>128</sup> (Department of Higher Education and Training (DHET), 13 September 2021), p.35

*until the end of the academic year or until the last student is given what's due to the student and then they can close shop and call it quits.”*

The student is afforded some measure of protection during the cancellation process. The DHET (2016, Section 23(2)(b)) requires that all private institutions ensure that suitable arrangements are made for students to complete the programme and that they are reimbursed through the utilisation of the financial surety facility declared upon registration.

In the case where the institution decides on teach-out following a review process, the institution should maintain the standard until a full cohort graduate. As indicated by Stanley (PHE11):

*“If we do a teach-out like we did with the Diploma, we maintain the highest level of teaching until the last student has completed and we support the student in the fullest sense of the word until the programme is completed. It's one of the decisions that we took from the beginning.”*

#### **5.4.3 Positive views**

The participants find the programme reaccreditation process beneficial and based on good practice. The PHE association participants share the opinion that programme reaccreditation is useful for the purpose it serves. One PHE association participant recounted the experience of the process at the institution:

*“We actually have to review everything every year. We have to build our infrastructure in such a way that we maintain it in a good condition. Students buy your infrastructure, in the first place, and they buy your programmes. Programmes in industry are phasing out so quickly, like IT. Tomorrow there's a new product on the market. So, reaccreditation is good. We have to review our programmes. We have to review every single institutional thing. That's a very good practice... For me, reaccreditation is a review of your programmes, in the first place... Do the students still want the programme? Is there a place for the programme in the market anymore? We do continuous reviews of our programmes, surveys and everything, which is a good thing.”*

The programme reaccreditation process thus facilitates that a programme remains current (aligned with developments in the field) and marketable. Lizel indicated that PHE11 had phased out two diplomas when it was found to be unmarketable:

*“... people would rather enrol for a Degree in Business Management rather than a Diploma in Entrepreneurship.”*

The above was corroborated by Stanley who reiterates that “In the industry out there, people are not interested in diplomas at all”. The institutions respond to market demand.

*“Some of the 2-year Diplomas are phasing out, so we have to try and put in a new programme. We actually want to move to degrees. We see there’s a new market for Degrees.”* (PHE association participant)

This indicates that business opportunities must be seized to remain viable. It appears that the private sector is phasing out the diploma for reasons *inter alia*: i) it does not have “the weight of a degree” (Stanley); ii) students do not want to study a diploma for three years when they could have done a degree; and iii) more students achieve matric passes that provide entry to a bachelor’s degree – if they do not meet requirements, they opt for a Higher Certificate to gain access. Stanley indicates that PHEI1 finds the latter entry route to be the more successful one. PHEI1 ensures that its programmes remain industry-relevant through review by external experts and alignment with guidelines issued by professional bodies. This enables marketability and student employability.

A SAQA participant regards reaccreditation for private providers as “non-negotiable” for the following reason:

*“In order for the system to get rid of all this fraudulent providers that can really take advantage of the situation because I’m just thinking: If we’re not doing that – after three years, we just leave it at that – there will be a lot of providers that will offer courses that are not registered.”*

CHE Participant 3 finds programme reaccreditation a valuable exercise “to ensure a quality learning experience for the student ... this is actually the purpose of reaccreditation and to identify where there are gaps and to assist the students, or the institution then, to sort out these issues”. CHE Participant 2 indicated that the process has changed substantially over the years, but in a positive sense. Although more labour intensive as it is “a lot of work”, “one good thing that has come out of it” is the heightened level of scrutiny on institutions that are already offering

programmes. Reaccreditation applies to existing programmes and therefore focuses on the programmes after they have been implemented and the first cohort of graduates produced. The peer reviewers would then have a clear indication about whether it has been implemented in line with the intention. As stated:

*“Since the application does not really provide for absolute detail about, for example, the level at which the learning is pitched, those things can only be ascertained during the reaccreditation and, even more so, when the site visit is done and there can be an examination by the peers of things, such as the learning material, the assessments, and some of the moderators’ reports, etc. So that you have a good idea of the policies, practices, procedures, quality assurance mechanisms, etc. in place.”* (CHE Participant 2)

Alex (PHEI7) proffers that the peer evaluation is thorough and the conditions sound. Despite the overall positivity, challenges have been experienced either with the regulatory process or developments in the sector.

#### **5.4.4 Challenges**

Some participants in this study highlight challenges with the process. For example, PHEI1 has entered a new programme reaccreditation cycle – the last one was in 2015. The submission date for applications to the CHE happened to coincide with the DHET’s due date for submission of the annual report<sup>129</sup>. As a “small” institution in Lizel’s opinion, the workload is heavy at this particular point in time. However, the fact that PHEI1 prepares for the programme reaccreditation cycle in advance (cf. discussion in Chapter 6) means that the processes are manageable, and deadlines will be met. However, this highlights the issue that institutions need to coordinate some administrative processes simultaneously which could prove to be challenging for staff who fulfil multiple roles.

James (PHEI6) indicates, “We’ve got already a quality handbook since 2004, yet I see that we are writing and rewriting it again, over and over again”. The institution improves on internal practice consistently and finds that in doing so, the administrative burden on its staff could become taxing. The conundrum is that a lengthy moderation process, for example, could be viewed as a lack of trust in staff

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<sup>129</sup> Due date for annual reports is before 30 April of each year; (Department of Higher Education and Training (DHET), 2016b); p.12

who, although professional, are not treated as such. Another challenge experienced by PHEI6 is that it finds “over-regulation” in some areas. For example, it might invest heavily in IT infrastructure to provide an electronic library with appropriate texts that are accessible remotely to all students to satisfy the requirements<sup>130</sup> when it might be better for a shared facility<sup>131</sup> to be available; or it could invest in drawing up the necessary policies relevant to its context, but these would be found lacking by peer reviewers.

Several participants indicated that the impact of COVID-19 has led to students discontinuing their studies, for various reasons, which means loss of income for the institution. In the case of PHEI1, traditionally a distance learning institution with a large population of working students, there is a new focus on contact learning for school-leavers who have benefactors. The institution is thus mitigating the risk of not achieving projected enrolment targets.

PHEI4 and PHEI6 share similar concerns: At PHEI4, a large amount of unpaid fees is outstanding since last year. It represents 20% to 25% of income and there is a drop in enrolment this year of the same, about 20%, because people do not have the money to pay the fees due to the economic impact of COVID.

At PHEI6, the impact of COVID-19 resulted in 27% less student enrolment and non-return of some students. The institution has a specific focus, through its bursary scheme, on supporting black female students, and students with disabilities, providing up to R27 million in bursaries to these select groups in one financial year. However, the budget for bursaries has been impacted through decreased sponsorship as companies are forced to restructure and retract support due to the impact of COVID. Although from previously disadvantaged groups, these students have no recourse via NSFAS.

Despite the economic impact of COVID, the institution has managed risk by retaining its staff which provides stability to its core business. James indicates that staffing is the “most expensive” at 65% of the total yearly budget.

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<sup>130</sup> cf. accreditation criterion 7 (CHE, 2004b, as amended)

<sup>131</sup> cf. (Department of Higher Education and Training (DHET), 2016b): Item 39-41 (p.31) regarding agreements on shared use of facilities

PHEI7 proves to be the exception in that there has been no attrition in student enrolment. Alex indicates that the institution has seen a 29% increase in student numbers this year.

A challenge experienced by PHEI2 is outlined by Abby who indicates that the institution has made a significant investment in both physical and electronic library resourcing to meet the requirements. However, PHEI2 finds that students do not utilise library resources as expected:

*“The students download now from the system, so why should they come to the library to take a hardcopy book? There are so many free resources now available.”*

To justify the huge capital outlay and encourage independent student learning, the institution has resorted to prescriptive measures: “We even now wrote in our assessment criteria for assignments for the different courses, as well as for the research that they get additional marks if they use a Sabinet journal. We had to put that in as part of the assessment criteria to be able to get them to use that”. The librarian is also playing a more active role in getting the staff and students “more involved in the library”.

The DHET participant finds that the current programme reaccreditation process is adequate to serve its needs and purpose concerning the administrative process that the DHET has to complete. However, the participant indicates that “there are a number of institutions whose reaccreditation hasn't been finalised, and that then creates an administrative problem for us, because we are sitting with accreditation reports that are not concluded”. As discussed earlier, this could be because the institution continuously does not adhere to requirements for it to be compliant or litigation has ensued.

CHE Participant 3 noted concern that some “legacy” reaccreditation processes have not yet concluded. The participant indicates that the DHET extends the institutions’ registration in these cases, while they await the CHE to finalise the process. Besides the abovementioned reasons, the delay might also have resulted from site visits that were placed on hold due to COVID-19 restrictions, offline processing of proceedings (i.e. representations, deferrals and/or conditions) which led to longer turnaround

times, and/or conditions not being processed within the required timeframes<sup>132</sup> (in the short and long term). Staff turnover is also cited as a reason since it caused a discontinuity in administration. This can be construed as a barrier to the institution for achieving compliance. Thus, it is evident that the responsibility for delays or inconclusive reaccreditation processes can rest with both parties. The participant is optimistic that the online process provides for shorter turnaround timeframes and that with the implementation of virtual site visits and dedicated staff in the portfolio, all processes will be concluded shortly.

There is also recognition of the fact that the process followed in the case of improvement plans can be lengthy which has contributed to reaccreditation and registration cycles not being concluded for an institution. The finalisation of “legacy” reaccreditation processes is crucial as the CHE moves towards the institutional audit process (linked to programme reaccreditation for private institutions from 2022 until the implementation of the QAF). It would not be beneficial to enter a new process with matters pending. The institutions that have not received an outcome would need to enter a new cycle for programme reaccreditation (and amendment of registration), or might have already passed their cycle date, which means that a substantial amount of time has elapsed between the last and next review. Whether these institutions have managed, in the interim, to continue the “quality work” required to uphold the provisioning of a quality programme should be determined.

A few participants find the engagement with staff at the regulatory bodies challenging. At least two participants indicated a positive relationship with DHET officials, whereas a few held reservations about the approachability or availability of some CHE and SAQA staff. In some cases, there is extensive engagement and continuous follow-up with the three regulatory bodies to get “all three ticks”. It is noted that overheads accrue while the “three ticks” are not yet received. Alex iterates that building a relationship with the different bodies has been constructive since his institution chose to adopt a developmental approach.

CHE Participant 1 finds the current process to be intense and voluminous which detracts from doing research that could better inform work processes:

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<sup>132</sup> See previous discussion: PHEI6 experienced that the processing of conditions takes a substantial amount of time.



*“In the process, I think one of the limitations that we have now is that we do not have time for research – the processes are so intense, they’re so involved, and the volumes are so big that they do not allow us time, especially at management level, to do research that would inform what is happening in the sector relevant to our jobs, but also what is happening internationally. I think institutions are much faster on this than we are.”*

The CHE needs to keep abreast of developments to take strategic leadership in the field of quality assurance and ensure staff capacity development.

## **5.5 THE WAY FORWARD**

The DHET participant indicates that improvements could be made to the programme reaccreditation process:

*“I think, instead of having like an exam/test kind of process, that perhaps we need something more developmental and to be able to say to an institution, on your reaccreditation, we find these strengths and these as weaknesses that need to be improved and the way going forward.”*

A collaborative approach with the DHET might serve to strengthen systems and processes overall. CHE Participant 2 states that sometimes institutions close their doors, not necessarily on account of the CHE withdrawing accreditation. It could be, for example, that the institution also has financial difficulties and closed, or because of the withdrawal of registration<sup>133</sup>. One of the biggest challenges is the maintenance of the learner records of that institution:

*“... when students lose their certificates and require a duplicate, or when they require an academic transcript, it is a real problem for them, and the system needs to find a way of ensuring that these are kept very safely.”*

The student’s well-being needs to be at the centre of any intervention or maintenance plan. A PHE association participant states that:

*“I would rather see, instead of being less regulatory, more efficiency in the regulatory processes. The implications for compliance and accountability and*

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<sup>133</sup> (Department of Higher Education and Training (DHET), 2016b), p.29; (Department of Higher Education and Training (DHET), 2016a), p.20-21

*protecting students are vital. Isn't that our reason for being? Even with all the regulation that we have, look at what we see in the sector. Imagine if we didn't regulate. I would just look at how can we better systematize it and also for the three key providers – CHE, SAQA and DHET – to be on almost a single system, so there is a seamless transition.*

It is clear quality assurance needs to be an earnest, transparent, committed, and united effort. PHEI1 demonstrates the earnestness with which programme review is undertaken: If there are concerns about the quality of a programme, a review is done; if enrolment on a programme is lower than might be considered viable, phase-out does not automatically ensue as the reasons for this are balanced against the value of the programme for the student (David).

CHE Participant 1 aptly states that there needs to be a balance of rights and responsibilities – by all parties: i) Students must understand that it is not just something they do at the end of the course “based on whether or not they liked the lecturer” – they must see how it fits into the programme review process; ii) Institutions must educate students on this and empower them to engage meaningfully; iii) The lecturers themselves need to be able to see that quality is not an additional function but about how they engage with the modules, with what they are responsible to teach, how they deliver it. They must have a voice in shaping the course and be empowered to participate in quality assurance; iv) Institutions must have their own processes of review to improve quality. The participant iterates that an institution must make that shift from “doing QA” simply because it is something that is required by the CHE. It is the researcher’s view that the process should be empowering and transformative<sup>134</sup>.

There should thus be “management for quality”<sup>135</sup> and, if there is evidence to demonstrate that, they would have earned the right to be “less regulated” – that is, less monitored, less evaluated, less scrutiny altogether – if there is trust that “things are going on and they are going on well”. On the other hand, if the institution has failed to demonstrate this and continues to exhibit a lack of capacity or internal quality assurance practices there would be a lack of confidence or trust in the

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<sup>134</sup> Saidi, 2020

<sup>135</sup> Brookes & Becket (2007)

institution's ability to ensure quality provisioning, resulting in consistent and regular evaluation and monitoring which could prove to be labour intensive for the CHE and constraining for the institution. As in any relationship, once trust is eroded it is difficult to restore, if at all. However, it has happened "in cases where institutions have done a complete turnaround" due to a change of leadership that is committed to "doing things properly" (CHE Participant 2).

CHE Participant 1 describes an institution where things were not "going on well". This is interpreted as signifier of an immature quality assurance structure or system and lack of internal capacity within an institution, viz.: i) heavy reliance on consultants to develop programmes and policies and submit applications for accreditation and/or registration on behalf of the institution; ii) not developing and educating staff on what the implications of the policies are and how to implement, monitor and track progress on the implementation of the policies for improvement. These institutions "have not earned the right to have the regulators pay less scrutiny to their processes". Once this right is earned, "there must be evidence of improvement" and demonstration of continuous improvement.

It is noted, however, that in instances where the CHE might have the impression that things are not "going on well" at an institution, the institution itself might hold a different view. In the case of PHEI6, its view of the conditions for reaccreditation or (reasons for non-reaccreditation) can be construed as "over-regulation" (cf. David, PHEI1) and the institution took the initiative to compare, for instance, its staff workload allocation model (set as a condition) with that used by four public institutions to find an acceptable format for presenting the same information for the sake of compliance. This echoes the view of a PHE association participant who indicated a lack of communication regarding new developments, or what the exact requirements are, whereas the accreditation criteria have remained static.

It is noted that quality improvement should not be isolated to the private higher education sector with the assumption that the public higher education sector is of high quality. As CHE Participant 1 states:

*"I would be tempted to say even in public institutions, there are pockets of excellence in some institutions within some faculties and even in the strong institutions, it's not uniform. There are faculties that struggle and it's the same*

*with private providers. Although your private providers, there are certain disciplines that would seem to struggle more than others but also the type of provider.”*

The above observation was confirmed by CHE Participant 3 who indicated awareness of the “problems” in the public sector. The differentiated approach to be adopted under the new QAF will need to address the “pockets of weakness” that exist in both public and private higher education institutions to realise the goal of the NDP2030<sup>136</sup> to improve the quality of education, transform the sector and eliminate the disparity between “world-class and mediocre” institutions, and have a higher education system that “enables people to fulfil their potential”.

As the CHE indicates in the new QAF, the differentiated approach<sup>137</sup> is recognition of the fact that institutions are at different stages of maturity in terms of internal quality management systems. The QAF’s risk-based approach<sup>138</sup> will permit focus on the areas of concern to support and enable development within the institution for the enhancement of quality. CHE Participant 2 posits that the CHE needs to consider how it could ensure that institutions, through their quality assurance mechanisms, can identify their weaknesses and rectify them before it reaches the stage where the CHE finds it necessary to withdraw accreditation.

The fixed term for accreditation for all qualifications in the system will ensure that both public and private higher education provision is scrutinised at set intervals to ensure and assure quality<sup>139</sup>. Since quality reviews will be at qualification, thematic, institutional and/or national level, a more holistic view will be provided (through data analytics) of the institution and its quality management systems at the required level and the higher education sector in general<sup>140</sup>. By making findings and outcomes of external quality assurance processes available on the QA-Dashboard<sup>141</sup> and providing a “State of Play”<sup>142</sup> on the sector, there would be greater transparency<sup>143</sup>, and the public interest would be better served. Perhaps a less litigious environment

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<sup>136</sup> Executive Summary National Development Plan 2030, p.38 & 40

<sup>137</sup> CHE, 2021a, p.33

<sup>138</sup> CHE, 2021a, p.54

<sup>139</sup> CHE, 2021a, pp.53-56

<sup>140</sup> CHE, 2021a, p.10

<sup>141</sup> CHE 2021a, pp.10, 21-22, 31, 33-34, 38, 40, 48-49, 51, 54, 62-63

<sup>142</sup> cf. Hoosen, Chetty & Butcher, 2017: *State of Play: Regional Quality Assurance in Southern Africa (SADC)*

<sup>143</sup> The POPI Act might not permit this.

will ensue, and “fly-by-nights” and “bad actors” will dwindle in the face of the multimedia broadcast of legitimate institutions that offer legitimate qualifications – an ideal state but one to which the collective effort can aspire. CHE Participant 3 states that the reaccreditation process is a useful exercise to sift the “good” and “bad” actors –through a site visit. An example was cited of how the site visit uncovered “good practice” done by a provider. By showcasing these “pockets of excellence” (CHE Participant 1), the sector can be enriched and capacitated to provide the student with a rewarding learning experience. CHE Participant 3 believes that by showcasing good practice, for instance in work-integrated learning or assessment, institutions would feel valued, add value and perhaps be less negative towards the regulatory system.

To reflect, review and revise for improved processes, the CHE, SAQA and the DHET need to continuously engage in research activity within their respected areas or fields on a wide scale, to gauge regional, continental, and international developments and good practice that could be incorporated for the benefit of the student and all stakeholders. As the CHE strives to fulfil its mandate and cement itself as a thought leader in quality assurance, it has gathered criticism of its approach and methods, however, significant strides made recently with the launch of the first national Doctoral review<sup>144</sup> on the continent cannot be overlooked. The findings of the Doctoral review should serve as a benchmark and part of the institutional “track record”<sup>145</sup> as per the new QAF. It is only through empirical evidence garnered through research that the CHE will be able to solidify its position and take the sector forward. As explicated by CHE Participant 1, it is anticipated that the new QAF will enable streamlining, and efficiencies and, in so doing, more time for research so that the CHE will be an agile agency able to respond appropriately to the identifiable needs in the sector:

*“... if the QAF... opens up space for the managers to build this intelligence on what's happening internationally, what's happening in the sector and what*

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<sup>144</sup> <https://www.universityworldnews.com/post.php?story=2020062909405560>;  
<https://www.dailymaverick.co.za/article/2020-02-10-the-council-on-higher-educations-review-of-phd-degrees-reveals-worrying-trends/>; <https://www.tut.ac.za/news-and-press/article?Year=2019&NID=313>;  
<https://www.ru.ac.za/latestnews/doctoreducationneedsareview.html>

<sup>145</sup> CHE 2021a, p.21 & 31

*changes need to be made. It also needs to be flexible and dynamic to allow us to adapt to the changes ...”*

CHE Participant 2 states that the link between the CHE and SAQA should be improved. As indicated:

*“If qualifications are not reregistered and, if accreditation is withdrawn, there needs to be further tightening of that as well as if, for example, professional bodies withdraw their approval for particular programmes. Not all of them will inform the CHE and sometimes we find out when we do a site visit, but that process needs to be formalised which we’re going to do through this MOA that we have developed as part of the QAF.”*

It should be noted that the CHE seeks to strengthen collaboration with statutory professional bodies to eliminate duplication of processes and, the researcher would venture to add, working at cross-purposes<sup>146</sup>. The CHE recognises that the professional body can play a complementary role in the external quality assurance process. Most, if not all, of the statutory bodies regard their function to be the accreditation of programmes, or institutions that offer programmes in the relevant field, or to set standards for the education and training of practitioners, among others, as mandated by the respective acts<sup>147</sup>. The professional body has its own requirements and conducts “accreditation” or “audit” visits to institutions. These could include prior self-assessment by the institution, evaluation against accreditation criteria and scrutiny of internal quality management systems<sup>148</sup>, which are similar to the CHE’s practices. Thus it is critical that a collaborative strategy is devised going forward. CHE Participant 2 points to the fact that the CHE might not be apprised if a professional body “de-accredits” a programme. This is essentially conflicting among statutory bodies if the CHE and SAQA have not withdrawn accreditation and registration. The student is at the receiving end by not being adequately prepared to enter the profession and not being guaranteed registration with the professional body upon graduation. Practices must be aligned to best serve the interest of the student and the profession.

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<sup>146</sup> CHE, 2021a, p.7, 10 & 58

<sup>147</sup> For example: <https://www.ecsa.co.za/about/SitePages/What%20is%20ECSA.aspx>;  
<https://www.sanc.co.za/about-sanc/>;

<sup>148</sup> [https://www.sanc.co.za/changes\\_r173/](https://www.sanc.co.za/changes_r173/); <https://www.ecsa.co.za/education/SitePages/Accreditation.aspx>

In terms of the concerns around prolonged turnaround timeframes, CHE Participant 2 indicates that the reaccreditation and registration processes are conducted linearly at present. In considering improved timeframes there are some aspects of the process that could be done in parallel. The new combined SAQA-DHET-CHE application form will be the first step towards achieving efficiency. It is also noted that the Council has called for institutional audits to be reintroduced for all higher education institutions. The relevant directorate is currently in the process of training institutions and recruiting suitable peer evaluators onto its audit panels before conducting audits. The institutional audits for private higher education institutions that will commence in 2022 will incorporate evaluation of existing programmes and the outcome will in due course confirm the registration status of the institution and its qualifications and programmes. The *Framework for Institutional Audits* (CHE, 2021) indicates that the process seeks to be comprehensive to make a definitive recommendation to the DHET regarding the registration status of an institution. As stated (p.4):

*“The recommendation to the DHET will also take into account information on the institution from national reviews, accreditation, as well as any complaints, which would have been considered when constructing the lines of enquiry for a particular institutional audit.”*

Both public and private institutions were engaged in developing the new institutional audit framework, manual and guidelines, thus a differentiated and transparent approach will be adopted. The scope of an institutional audit for a small institution will differ from that for a large, public university. The nature and context of the institution will inform the duration and scope of the audit<sup>149</sup>. The institutional audit approach will be an evaluation of the internal quality management of an institution and requires that capacity development is done at the outset through preparatory workshops and support in preparing the Self-Evaluation Report. Considering the concerns raised by CHE Participant 2 regarding the importance of self-evaluation as reflexive practice and the need for development in this area, the support that will be provided in the institutional audit process is regarded as a positive step for capacitating institutions.

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<sup>149</sup> pp.20-21



The audits will also provide baseline information for the track record of the institution under the new QAF<sup>150</sup>. Verification of the internal quality assurance system of a private higher education institution will determine whether (amendment of) registration can be recommended to the DHET, and programmes, sites and modes of provision reaccredited. The relevant CHE directorate will make available a manual designed specifically to guide private higher education institutions in the process<sup>151</sup>. A concerted effort is being made to provide support in various ways. It is anticipated that the process will establish the functionality of internal quality management systems. The level of functionality of the systems, their credibility and efficiencies and effectiveness should provide insight to capacity development that might be required as the CHE moves forward towards implementation of the QAF.

Under the QAF (CHE, 2021a, p.54), all higher education institutions, albeit public or private, will need to submit their qualifications for “confirmation of accreditation”. Accreditation will be for a fixed period. The “confirmation of accreditation” process is as yet embryonic but is anticipated to be a more beneficial process than the current one which is “extremely fragmented”<sup>152</sup>. Shifting the focus to the institution as a unit of analysis in the QAF will permit drawing together the threads of all of the information, and the intelligence gathered through all of the processes to provide a holistic view of the institution and its internal quality management system, and its identity as a higher education provider. It is believed that if change is driven by the Academic Head (or the Vice-Chancellor or Deputy-Vice Chancellor: Academic), it cascades through the whole institution and enables building a culture of quality, and not fragmented pockets of excellence (CHE Participant 2).

*“The thinking in the new framework is extremely progressive, but it's going to have to be based on a high level of trust, maturity in the sector, commitment to the quality agenda and to the fact that our country needs graduates that will build our economy, that can contribute to the upliftment of our society. So, this is not about just higher education. This is about building our country.”*

These are lofty ideals that resonate with the NDP2030 and White Paper for post-school education and training. This can become a reality if institutions indeed re-

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<sup>150</sup> p20

<sup>151</sup> p.22

<sup>152</sup> CHE Participant 2

examine their vision, mission, and purpose in higher education, take ownership of the quality agenda and collaborate with the CHE, and if the CHE stays true to its objectives and approach as set out in the QAF. CHE Participant 2 indicates that the developmental approach has always been there, from the CHE's founding document<sup>153</sup> to the new QAF, but it is recognised that an inherent tension exists between accountability and development. The QAF is swinging the pendulum more to the developmental side to enable institutions to demonstrate they do not need such intense external scrutiny because they have taken ownership of the process and can manage and ensure their own quality. The QAF, in its differentiated approach, will permit these institutions to have a less rigorous process to follow, while more time, effort, support and development work is expended on institutions where the need exists (*ibid*).

A PHE association participant indicates that the CHE must align with practice in other sectors:

*“Do like the other QA bodies – give the institution accreditation. They will be more confident. You could even have a surprise site visit by the CHE. Your staff must be in place every single day.”*

Another participant also proffered the suggestion of a “surprise visit”. This would not be necessary if there is trust that “things are going on well”. The new QAF will proceed on trust and a benchmark of internal quality management systems provided through institutional audits. The NQF Act (2008, as amended in 2019) mandates the Quality Council to accredit institutions. If the QAF is operationalised as a transformative approach, the CHE could have the trust and confidence in the sector to identify self-accrediting institutions as, for example, in Taiwan (Chen & Hou, 2016) or Australia where institutions can apply to the Tertiary Education Quality and Standards Agency (<https://www.teqsa.gov.au/applying-self-accreditation>) to self-accredit “specific courses, fields of education and/or levels”. TEQSA requires institutions to adhere to the threshold quality standards<sup>154</sup> for higher education. Similar standards (and guidelines) would need to be put in place by the CHE if it decides to follow this route.

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<sup>153</sup> (Council on Higher Education (CHE), 2001)

<sup>154</sup> (Australian Government, 2021)

The participants are positive about the implementation of the QAF. Holly (PHE14) indicates:

*“I’m excited about the intention, and I hope that is not going to make it even more onerous but actually just more streamlined. I’ve attended a couple of workshops with the CHE which have been really useful and very informative... we’ve been able to implement and apply immediately or put it into a process of implementation within a short period of time.”*

The accolades bode well for the implementation of the QAF and the CHE’s developmental strategy.

Alex (PHE17) is positive about the introduction of institutional audits that will deliver an outcome on programme reaccreditation as of 2022. As an interim process for the new QAF, Alex finds it a suitable external mechanism to move from the current process which sought to “quality manage an institution from outside of the institution”. The move from “external quality management” to “internal quality management” is believed to be a “game-changer”. The onus rests on the institution to ensure the quality of its programmes and qualifications. The institution, thus, accepts the responsibility and accountability to achieve compliance but also to effect improvement, if necessary, for enhanced quality.

An issue that needs to be considered in the way forward relates to a concern raised by Alex who indicates:

*“We have new programmes that have never been reaccredited since they began.”*

The concern underscores the need for robust internal quality management systems that can assure and ensure the quality of a programme, regardless of the external quality review that is conducted. The interim institutional audit reaccreditation and new QAF “confirmation of accreditation” processes need to include all programmes in the external review, that is i) all those that have not been offered for successive years (dormant programmes) – whether a graduated cohort has been produced or not; ii) all those that are newly accredited and registered which are being offered but no cohort has been produced by the time of external review; and iii) all those that have produced a cohort. The institutions should provide detailed reports of internal

(and external) reviews of all these programmes. As any new developments in the relevant subject field could have occurred since Day 1 of offering, the institution has to review the programme to retain its currency. It will also not be able to “shelve” programmes indefinitely. In other words, the CHE needs to be specific about the basis on which accreditation is withdrawn for a dormant programme, including stipulating the minimum timeframe within which a qualification has to have first-time enrolment. For example, if a Higher Certificate (of one-year full-time duration) has no student enrolment for two years following accreditation, the CHE should consider withdrawing accreditation if there are no programme review reports available or these reports do not satisfactorily outline the reason for dormancy.

If there are any changes to a programme following an internal review, these need to be documented and approved. Furthermore, if any changes to a programme lead to changes in the qualification (within 50% bounds), the institution should submit these for evaluation during the audit or QAF process so that SAQA can be informed of amendments to the qualification upon recommendation of reregistration. All existing programmes and qualifications that are in the system are thus quality-assured, and there is a process for continuously ensuring quality, and curating the HEQSF.

It is argued that there are two major theoretical perspectives on quality, i.e. an output perspective (i.e. customer satisfaction, value for money, zero error) and a process view of quality as being transformative (Stensaker; in Westerheijden *et al.*, 2007). The CHE’s external quality assurance agenda has a focus on transformation which is aligned with the “broad transformation imperatives of the South African higher education sector” (CHE, 2021a, p.57). Thus, the QAF (*ibid*) will focus on the quality of learning and teaching, and higher educations will be assessed in terms of the related functions and operations.

As the CHE moves towards the implementation of the QAF, the institutional audits (CHE, 2021b) will serve to provide a benchmark of the internal quality management systems in place at higher education institutions. The institutional audit is “strongly influenced” by the national transformation agenda (CHE, 2021b, p.14). Institutional audits have been reintroduced by the CHE for all higher education institutions. As defined in the *Manual for Institutional Audits* (CHE, 2021c, p.7), an institutional audit is “an external quality review process of an institution’s quality management system

and its constituent elements, based on that institution's identity, nature, context and strategic goals. Such a review systematically and objectively evaluates the system's appropriateness, coherence and effectiveness in assuring the quality of institutional delivery of higher education's core functions". The core functions are learning and teaching, research and (integrated) community engagement.

The *Manual* (p.8) indicates the quality management system "refers to the institutional arrangements that assure the quality of learning and teaching, assessment, research, and community engagement. Such an integrated, internal system supports, develops, enhances and monitors the institution's delivery of the core functions of higher education". Flowing from this external quality review process will be a determination of whether the private higher education institution's programmes can be reaccredited. In being reaccredited, the CHE will confirm the quality of the programme for it to be retained in the system.

The CHE's definition of quality (2021a, p.30) includes "fitness for purpose" and "transformation" to be seen at the broader institutional level, in its structures, systems, processes, learning and teaching, and so forth but also at programme and qualification level. Menon and Castrillon (2019) argue that it is "unclear to academics and students what transformation means, what it requires, and what it implies for the approaches to teaching and learning adopted in our institutions". Menon and Castrillon indicate that an external agency cannot bring about transformation, e.g. curriculum transformation, and that "the distance between the CHE and its mandate to drive and report on the achievement of transformation, and the universities and private providers responsible for its implementation is further complicated by the realities of a hugely differentiated HE system". The institutional audits that will provide an outcome on programme reaccreditation, and the QAF that will provide "confirmation of accreditation", will thus need to include a "process view of quality as being transformative"<sup>155</sup> both at the programme and/or qualification level and institutional level when evaluating internal quality management.

## 5.6 CONCLUSION

This study is distinct in that it adds to the body of knowledge in the following ways: i) adds to knowledge on the programme reaccreditation process (and [amendment of]

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<sup>155</sup> Stensaker; in Westerheijden *et al.*, 2007

registration processes) conducted in the private higher education sector in South Africa; ii) the lived experience of staff and regulators who manage the programme reaccreditation process is recounted; iii) and provides insight into the current state of the private higher education sector. The empirical evidence confirms that the private higher education sector in South Africa is diverse and that institutions encounter barriers and constraints (Stander & Herman, 2017), either structural or systemic, that impede achieving compliance with regulatory requirements.

The empirical evidence indicates quality assurance is necessary, and it is about more than compliance. In the words of a SAQA participant:

*“I think that ... the ultimate goal is not to get accreditation as a private higher education institution... people tend to forget the learner and what the learner will be able to do after completing their studies. I think that if they change that mindset, I think that our education system may improve drastically.”*

Quality assurance is about instilling trust in the quality of higher education and providing an enabling environment for competent and employable graduates to be produced. Quality assurance can be linked to the sustainability of the organisation, being known as a quality provider, being a good brand, and the idea that quality enhancement can aid confidence in the “product” (both the higher education programme and student), continued marketability, a competitive edge and solidifying a good reputation for longevity of the institution. Hoosen *et al* (2017, p.148) report that a participant South African private institution in their study goes “beyond these directed and minimum standards” of the criteria “in attempting to ensure that ... students and clients receive value for money education...” since, in their experience, “good quality is good for business”.

If any self-respecting institution wants to operate in the sector, retain its foothold, and be known as a quality provider, it will not pay lip service to, nor window-dress for, compliance. It is evident from the empirical findings of this study that a “quality provider” should be more than just a “compliant” provider and that quality education is about more than being “compliant” with the accreditation criteria. Hoosen *et al* (2017, 148) report the participant South African private institution’s view that understanding of the quality assurance framework is required, which means that staff need “to be trained in the ‘translation’ and ‘interpretation’ of the framework nationally

into the framework institutionally and then the impact in the tasks they perform as part of their day to day activities”. Thus, “quality work” (Elken & Stensaker, 2018) and “quality workers” embedded in the operation of the organisation.

In the words of CHE Participant 2:

*“Ideally, in... external quality assurance, you should be moving towards a state where there's no need for quality assurance anymore because the institutions themselves are regulating themselves so well that you don't need an external body. That's the ideal state but, at the moment, there is such a diversity in the capabilities of institutions to self-regulate in terms of their own quality assurance that the CHE has to play this role, but it's also realised that it does not need to treat every institution the same.”*

To bridge the spectrum of capabilities, the CHE needs to have comprehensive guidelines to the criteria or standard so that institutions are clear on the expectations. This is anticipated to happen with the introduction of the QAF that recognises diversity and aims to differentiate between institutions based on the functionality of the internal quality assurance systems (CHE, 2021a).

In the next chapter, the internal quality management systems of private higher education institutions will be discussed. There will also be consideration of whether the institutions that participated in this study manifest as open systems in terms of the PHEI Open System Model.



## CHAPTER 6

### DATA AND FINDINGS

#### 6.1 INTRODUCTION

In this chapter, the qualitative data collected through fieldwork conducted for this study will be further discussed and analysed. As explained in the previous chapter, Atlas.ti9 software was used for the coding and thematic organisation of the data. The research purpose, research questions and PHEI Open System Model conceptual framework were used as a guide to ensure that links could be drawn and that the focus remained on the aims of the study.

The focus in this chapter is on internal quality management of the programme reaccreditation process at the institutions that participated in this study. It will be explored whether these institutions manifest as open systems in terms of the conceptual framework, namely the PHEI Open System Model. The discussion will commence under the relevant themes that emerged.

#### 6.2 INTERNAL QUALITY MANAGEMENT

For this study, the sampling of institutions was based on the number of programmes and categorising these as small, medium, or large institutions (cf. Ch.5 for sampling). Seven institutions participated in the study.

The empirical evidence reveals there are internal quality management systems in place in the respective institutions. Each institution has a governance and leadership structure, policies, and several committees underpin the governance, leadership and management, and operations. A synopsis of the internal quality management structure of the respective institutions follows.

##### PHEI1 IQM:

Three participants from PHEI1 participated in the study. As indicated in Chapter 6, PHEI1 currently offers more than 18 programmes (across contact and distance mode of provision). It is a non-profit organisation that had three staff members when it originated just over ten years ago and grew to have a staff complement of about 120 at the end of 2020. The institution has a Board of Directors and Management Committee. Stanley indicates that the institution is constantly evolving and that restructuring will be commensurate with organisational growth. The previous

leadership and management structures comprised a Registrar and Provost-cum-Academic Head, then Registrar, Provost, Academic Head, and Programme Coordinator. Since 2019, the institution has established new faculties and employed a Dean for each and revised the existing leadership and management structures. The position of Provost has not been retained. The revised structure includes the Dean of Faculty and Head of Department, Subject Head as well as a Faculty Board. The previous Academic Committee has been replaced by Senate. This structure is intrinsic to quality management at the institution. The Head of Department is responsible for ensuring quality in the relevant department and the Programme Coordinator manages programme delivery and the quality assurance thereof. The Programme Coordinator and Subject Head roles are reviewed every three years, to allow for revolving capacity building of staff, whereas the Head of Department position allows for career pathing at the institution. In the larger Faculty, more than one Head of Department is appointed, and in the newly established Faculty, the Head of Department also fulfils the Programme Coordinator role until growth dictates new appointments.

The institution has 70% full-time and 30% part-time staff (over 120 teaching staff) for a student enrolment of approximately 1700 (including new 2021 intake at the time of interview). Part-time staff are employed for specialist subjects. This means they might lecture only one module, which does not make full-time employment viable. The institution does not employ the services of consultants. The institution strives to establish a learning environment inclusive of students, lecturers, support, and administrative staff. The workload allocation model strives for fair distribution and support for less experienced staff. There are development opportunities for staff, and further study is funded by the institution.

Lizel, one of the participants from the institution, indicates that with more programmes, the “quality assurance doubles”. This is interpreted as an increase in workload since there is more “quality work” to be done by the same role-players. The institution has a Centre for Teaching and Learning that supports the lecturers. According to Lizel, quality assurance is also done in this unit to ensure that assessment and student support are on par.

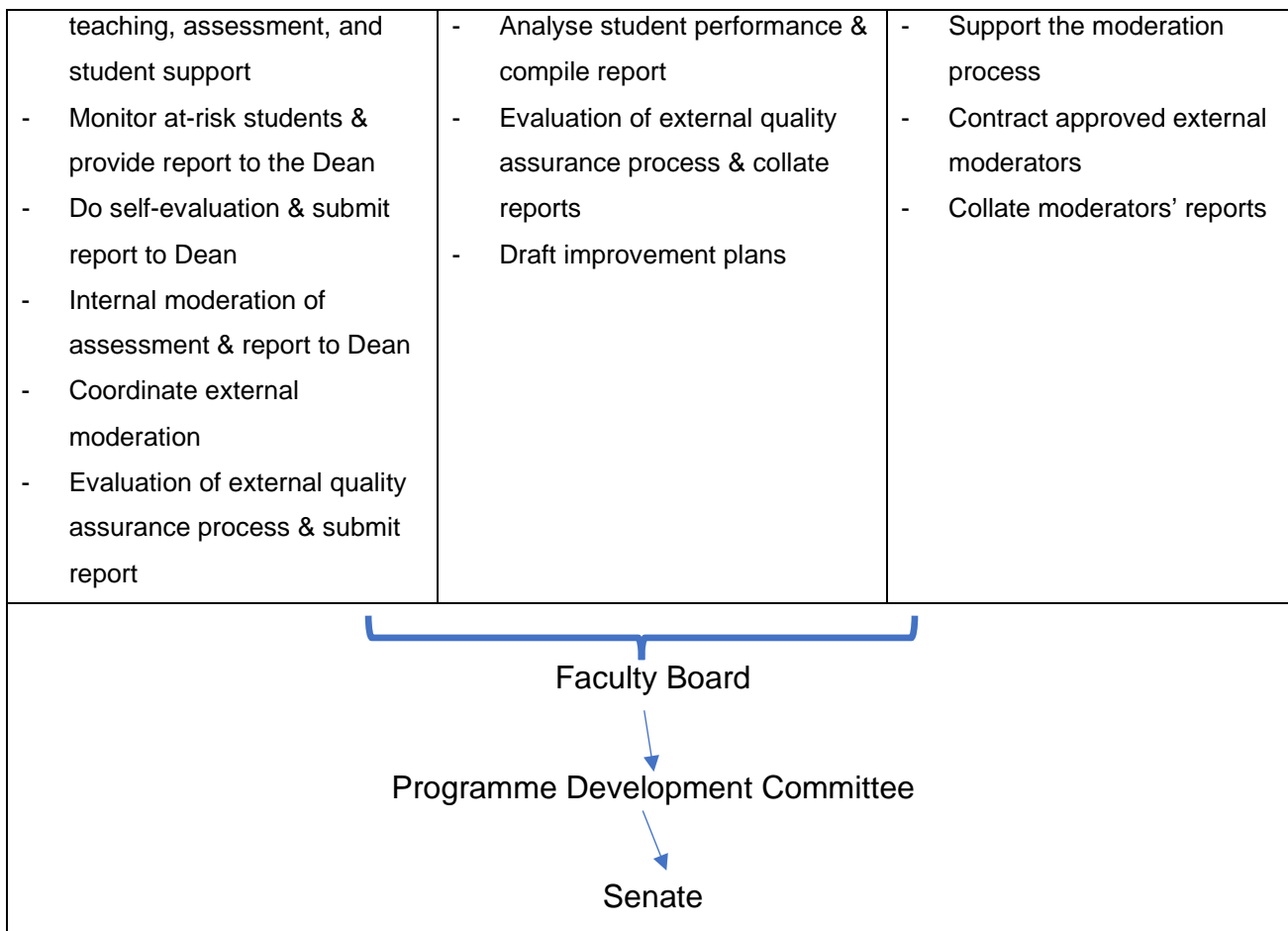
When the institution started, the Provost was primarily responsible for programme design in collaboration with externally contracted academics, however, as it expanded its offerings, the Dean, Head of Department, Programme Coordinator, Subject Head and Faculty have become involved in designing the programme and developing the modules. Establishing a new Faculty requires, at least, the appointment of the Dean (who needs to have extensive experience in higher education) and Programme Coordinator to develop the first programme. This ensures academic leadership in the programme at the outset, and that “the quality mechanisms are developed into the programme” (Lizel). Programmes are initiated at the Faculty level and management can also request conceptualisation of a programme (David).

When programme design is completed, it is submitted to the Programme Development Committee for review and approval. If the Programme Development Committee finds a need for improvement, then the institution contracts external peers for feedback on the programme. Thereafter, the programme is submitted to Senate for approval and then submitted for accreditation.

The Registrar is responsible for internal quality assurance. The Registrar’s responsibilities include quality assurance of policies (which are reviewed every two years), and ensuring adherence to policy, and providing staff and student data relevant to the reaccreditation and registration processes. The previous Provost position (currently filled by a staff member to complement the Registrar’s role in quality assurance) has the responsibility for programme-specific information, such as monitoring and evaluating, and record-keeping of, all the (re)accreditation and registration outcomes and peer reviews.

Quality management at the programme level is as follows:

Faculty	Deans, Heads of Department, Subject Heads & Programme Coordinators - Responsible for IQM at programme level	Registrar / Administration
- Liaise with the Centre for Teaching and Learning regarding learning and	- Analyse student feedback & compile report	- Circulate student surveys and analyse feedback



The programme reaccreditation process is not treated as a standalone process. The institution takes a systematic approach to internal quality management of the reaccreditation process. It is integrated with the accreditation process for new programmes and overall self-evaluation conducted by the institution each year. The reaccreditation process is used as a benchmark for new programmes. Lizel recounts that the templates provided by the CHE during the reaccreditation process become the self-evaluation templates for new programmes. At the end of each year, the responsible faculty need to follow the same steps as for programme reaccreditation: they form programme groups and provide input on the templates and ensure that all the evidence is in place. Evidence is recorded in terms of accreditation criteria 1 to 19 for ease of reference. When these programmes enter their first reaccreditation cycle, all the evidence is already available.

*“If everything goes according to how our processes work, and how we structure our operations, then we must just be able to upload the required documents to satisfy the 19 criteria.” (Lizel)*

This means that initiation of external programme reaccreditation coincides with the internal conclusion of the process. Although the institution only recently entered its new programme reaccreditation cycle, it has been preparing for the eventuality since its first review about six years ago. Peer reviews by academic and industry experts are ongoing throughout the year, and student surveys are done at least twice a year. Alumni are also surveyed. Feedback is analysed and incorporated in improvement plans. David indicates that feedback from the CHE is tabled at the Faculty Board meeting. If it's a programme-related matter, the Programme Coordinator will attend to it; if subject-related, the Subject Head will accept responsibility and the Head of Department will ensure that, within his or her department, those issues are addressed. This indicates the absorption of information from the external environment into the internal environment and the conversion of resources in the throughput process.

The Dean of the Faculty will have to look at the programme because the programme coordinator falls in the line function of the Academic Head who has delegated it to the Dean/s where the programme is implemented. Programmes might run across the Department and/or Faculty borders, therefore, the Head of Department cannot be the Line Manager of a Programme Coordinator (*sic*).

*“When we come to reviewing the programme, of course, then we will see whether the things that we've ... picked up were addressed, but it should be addressed because people have to ... report on that and we look at that. So, like I've said, we try to grow that culture.”* (David)

Students are advised of any improvements resulting from student surveys and information received via the Student Representative Council, thus closing the loop. The institution tracks the employability of its graduates and canvasses employer opinion on graduate adaptability and compatibility to the workplace.

Programme review includes *inter alia* looking at student performance, viability and currency of the programme, marketability:

*“Every time when there is a new cohort of students, the programme needs to be evaluated... an internal review to make sure that we're still on track ... the Registrar's ...looking at the performance and the output, throughput, etc. and of course, the numbers. You look at the input on lecturers' side, whether it's*

*viable to offer those programmes. What we've seen – there are two programmes, for example, the Advanced Diploma ... which we don't think is viable anymore. So, it will eventually phase out, either this year or next year, but we have to get something in place for that. Like I said, we're going to look at the Postgraduate Diploma ... which might be more viable and more lucrative to students ... The other programme – numbers are reasonable, but the integrity – the programme needs to be evaluated urgently.” (David)*

Overall, there is thus a rigorous programme review process in place.

There is a bottom-up and top-down approach to internal quality management, involving all relevant role-players. There are levels of accountability commensurate with the role and responsibility. The accreditation criteria are “embedded” in all operations and reporting is done as required. Quality management is integrated into all aspects – from programme design to delivery and review – and there are support systems in place. Evaluation panels, comprising external peers from public institutions and industry, are contracted to review existing programmes for reaccreditation purposes. The academic team in each faculty coordinates these processes and ensures that reports are made available. Self-evaluation and site visits are also done by relevant professional bodies for programmes that require their endorsement.

Lizel observes that the criteria for programme accreditation encompass programme-specific and institutional requirements. Therefore, feedback on the outcome of a new accreditation application (meaning a “condition” for accreditation), for example, clarity required on the staff development plan or articulation opportunities, is categorised accordingly. The institution will then address these concerns across its programmes and at the institutional level:

*“... if you have issues with accreditation, the next evaluator might find the same. It's just easier that you address it and then it's clear.”*

Taking a system approach thus mitigates risk to enable continuous compliance. Besides structural changes to the organisation, the internal quality management process has been reviewed and procedures refined. For example, external moderation used to be a “tick-off – is this done, was that done, etc.”, but new forms have been introduced for reporting on assessment and moderation that require

qualitative responses to ensure that role-players engage. Responsibility and accountability are built into the value chain and quality is built into every step of the process. The process is seemingly more “complex” with different layers built in. This is indicative of building a quality culture that filters through the institution and requires the input of all role-players (David). Being “complex” means more people involved and being more involved.

A basic schematic of the internal quality management structure is presented below:

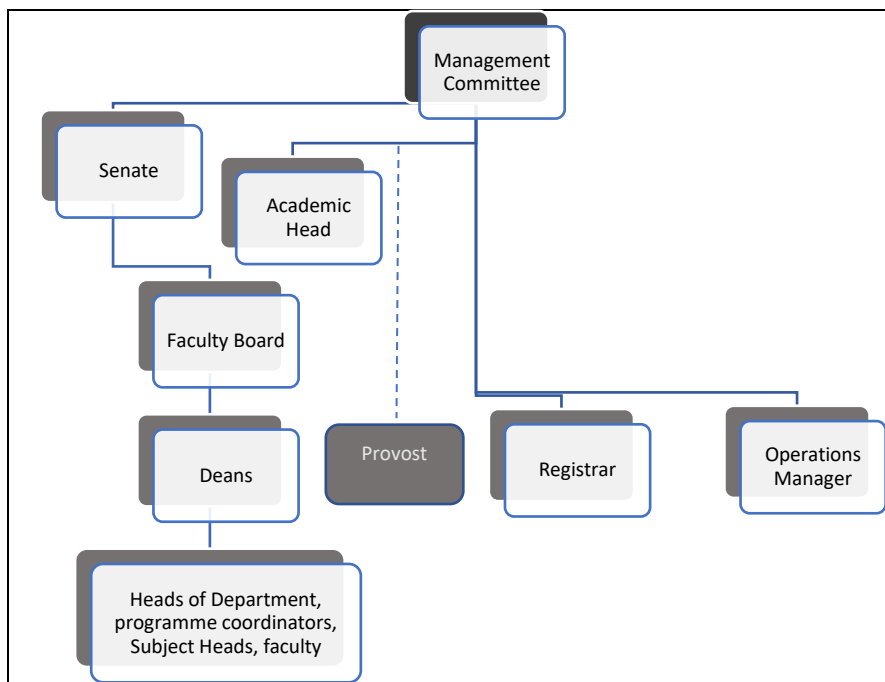


Figure 2: PHE1 internal quality management structure

Lizel indicates that the institution will take further steps at improving the internal quality management system (see Figure 1) by establishing a dedicated quality assurance unit. A manager will be appointed for the function which will fall under the Registrar’s office. This is a strategic move to get the institution ready for implementation of the new QAF. The institution acknowledges that there is room for improvement before it will be ready to self-manage internal quality successfully. As stated by David:

*“We want to make sure that we grow with the CHE in the process. So, in three years’ time<sup>156</sup>, that we are ready to do it. I will not say we are ready to do it now but trust me ... (the Institution) will be empowered so that they can take*

<sup>156</sup> The proposed implementation date of the QAF is 2024.



*over that role to a great extent, we trust, and that's what we strive for.”*

(Researcher's insertion)

There is therefore a plan to strengthen internal quality management. David's exposition on internal quality assurance reveals that the institution is open to change, and it is indicated that a supportive, collaborative approach from the Quality Council would assist the institution to achieve quality enhancement, not only compliance. The participant believes that a “judgemental” approach will reap less reward than a developmental approach applied to both private and public institutions.

The institution adopts a proactive approach to achieve compliance within the required timeframe and has processes in place to enable quality enhancement. It shows clear signs of achieving a robust quality management system that leverages capable leadership and management structures; careful planning; relevant and current policies and guidelines; reflexive practice; risk analysis and mitigation of risk; keeping abreast of developments in subject fields, industry and the sector at large; systematic implementation of the process; utilisation of available resources; staff agency; staff engagement; skills and knowledge; interdependencies; approvals processes including top level; and a network of academic and industry peers.

#### PHEI2 IQM:

For this study, the institution is regarded as a medium-sized institution (six to ten programmes). One participant, Abby, volunteered to participate.

The institution has different divisions, including higher education and technical and vocational training. This is a similar situation to numerous institutions in the private higher education sector. The institution has over 1000 students.

The internal quality management structure is a “short structure”/“narrow structure” because it is “not a huge institution”. A basic schematic of the internal quality management system is provided below:

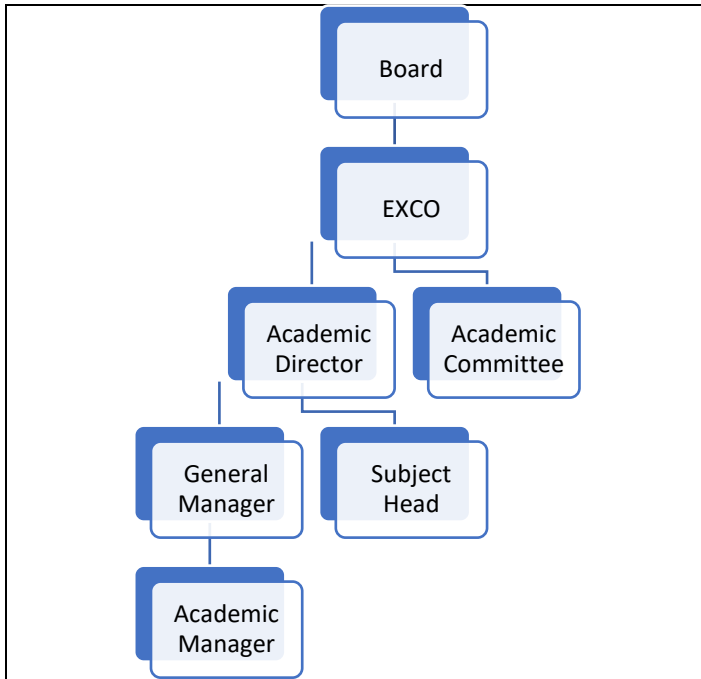


Figure 3: PHEI2 internal quality management structure

The institution operates over different sites of delivery where the General Manager on the site is responsible for staffing, operations, and client service. The Academic Manager per site is responsible for quality assurance and manages all related matters, *inter alia*, curriculum design and assessment. The operations team reports to the Academic Manager and the team's responsibility includes student support and administration. The Academic Director manages quality assurance across the board. The "Academic Director" position recently replaced the "Head of Academic Administration" position. The Academic Committee forms part of the internal quality management structure, comprising the Academic Director and Academic Managers. A recently employed staff member is solely responsible for liaison with the regulatory bodies and overseeing administration related to the accreditation and registration processes. The institution has a range of policies in place, including a "policy on policies". A programme is centrally managed from a base site and distributed nationally to all sites.

The institution benchmarks its programmes both nationally and internationally. It utilises the services of external peer reviewers from public institutions and the industry.

The student population consists of working students who study part-time on a "flexible enrolment schedule". Although a contact learning provider, students do not

enrol per semester but module. The institution offers one module (course) at a time that is offered in six-hour sessions on a particular day (or three-hour sessions twice per day due to COVID-19 restrictions). The minority pay their own fees whilst the rest is sponsored by the employer. Programme review includes feedback from students through student surveys.

The majority of staff are employed on a part-time basis and mainly drawn from the industry<sup>157</sup>. Besides teaching, part-time staff might be involved in other activities. As explicated by Abby:

*“We actually have the situation that even our facilitators<sup>158</sup> become part of the ones actually helping with the programme development because we have got national subject heads. It's a national management of the programmes and the national people, in their regions, they manage then also the subject heads and the subject moderator which are then sort of looking at the different courses and they coordinate and, nationally, we all use the same course.”*

The subject head is providing academic leadership in the programme across sites of delivery. The internal quality management system shows stratification at the regional and national levels.

The institution has adequate infrastructure and facilities, including an online library facility. It has sufficient, adequate teaching venues.

The institution has undergone two programme reaccreditation cycles to date. Internally, programmes undergo review at five-year intervals on the following basis:

*“We even have got a policy on which programme, in which sequence. Once the sequence is complete, it starts in a new sequence based on where the biggest need is.”*

The institution employs peer, student and client review, and benchmarking in its processes. Similar to PHEI1, it has introduced an efficient administrative system that links with the programme reaccreditation process. The evidence per criterion is compiled as ongoing practice:

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<sup>157</sup> See discussion under “constraints” further in this chapter.

<sup>158</sup> Part-time staff

*“We also have got a whole portfolio, where we are so well trained now already. For instance, if a student comes to you with a strange request, immediately we would say put that in file number so-and-so, and so forth. We file the numbers based on the criteria ... we even collect data throughout the year so that we don't rush around.”*

Preparation for the next reaccreditation cycle thus becomes routine. By the time the reaccreditation cycle is initiated, the portfolio of evidence is almost complete. It is not a mere tick-box exercise as the institution is “constantly looking for improvement in our quality”. There are standard practices in place, including in administration and for brand identity, for consistency, and adherence to norms and standards to reflect a positive image of the institution.

*“The processes, even the quality of the documents that we send out – we are very sure about standardisation. Every time there is new management, the logo changes, and we make sure that all the documentation has got the same logo ... we practice what we preach in quality management.”*

PHEI2 might differ from the rest of the participants in that its context and internal quality management might not correspond with the traditional notion of a contact learning higher education institution. Nonetheless, the empirical data reveals a quality agenda and attempts to achieve compliance with the quality criteria and enhance quality. This points to the diversity in the private higher education sector and the need to adopt a differentiated approach to external quality assurance.

### PHEI3 IQM:

For this study, the institution is regarded as a small institution (between one and five programmes on offer). One participant, Len, agreed to participate in the study.

According to Len, the institution was started by a prominent political figure in collaboration with academic(s) in the early 2000s. It offered its first programmes under the auspices of a foreign higher education institution. The suite of programmes includes undergraduate and postgraduate study.

Len explicates that the internal governance structure is fairly compact due to it being a “very small institution”. At the participant’s previous workplace(s), there would be up to four sub-committees that feed into teaching and learning and from there into

Senate. Until recently, the institution had a similar structure with several sub-committees. This led to duplication; therefore, the system was streamlined by clustering the different committees on programme design, learning and teaching, assessment, and policy and so forth into a Teaching and Learning Committee and Assessment Committee. These committees meet quarterly and report to Senate, which is the decision-making body on all academic-related and academic quality assurance matters.

A simplistic representation of the internal quality management system is depicted below. The organisational leadership and management structure provide input to the internal quality management structure:

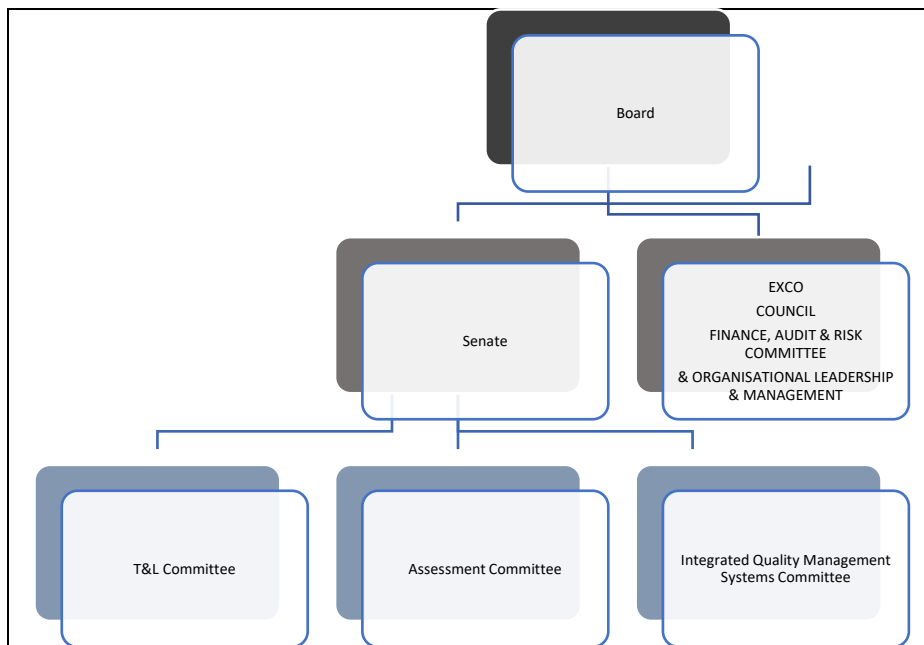


Figure 4: PHE13 internal quality management structure

Despite being a “very small institution”, it has a “fairly large structure”. For example, the programme management reporting line is as follows: Programme Convenor → Programme Coordinator → Programme Manager → Dean. Len indicates, from an academic and operational management perspective, there are approximately 40 individuals that work within the institution. Faculty are largely contracted individuals who are employed for the delivery of a module for three years and then for the delivery cycles of each module thereafter. Each module runs between seven and eight weeks, depending on its credit value, thus staff are completely occupied for that particular period. There are three full-time faculty on staff.

*“It must be in excess of about 80 individuals that are involved in the actual delivery of the programmes as faculty.” (Len)*

The involvement of staff in internal quality management appears to be limited to the contract term.

Len states that the institution has a “very complex workload allocation model that is attached to student numbers”. Small groups of students are attended to by each lecturer. As student numbers grow, more faculty are contracted. The institution has a site of delivery with lecturing venues, but the current budget does not cater much for physical infrastructure since the “office” has been standing mostly empty for the last year due to COVID. All activities have moved online, therefore, resourcing is primarily around faculty and technologies (Len).

The institution is currently engaged in the reaccreditation process for one of its programmes. A few of its programmes have already undergone three reaccreditation cycles.

The programme reaccreditation process starts with the Academic Management Team. The Academic Management Team consists of the Registrar, the appropriate Programme Manager for each of the qualification types on offer (e.g. bachelor’s degree), Programme Coordinator for each programme, the Executive Dean of Academics, the Programme Design Dean, and the Executive Dean of Growth and Sustainability. The tasks are allocated to specific individuals, for instance, the Programme Design Dean would look at programme design or curriculum revision. The Registrar would initiate a workgroup to look at the policy. The size of the team depends on the number of programmes that need to be evaluated. Working groups, consisting of relevant specialists (academic staff), are typically formed to attend to the requirements and address concerns raised by the HEQC. If there is a query around programme design or credit values or weighting of assessment, “we would gather those individuals around and they would form working groups and submit evidence to the formal governance structures before approval and sending to the CHE” (Len). There is, therefore, the “conversion” of human “resources” in the throughput process.

During a previous cycle, all the programmes that had been submitted for evaluation were reaccredited (following proceedings); the recent one (approximately three years

in process) will be concluded once short- and long-term conditions have been met. The achievement of reaccredited programmes (the output) is indicative of an open system.

Len indicates that, since he joined the institution in 2018, consultants have not been used. The institution draws experts from industry “when we test programme review processes or when we need their input in regard to curriculum design, etc.” (Len). Programme design is done internally.

The curriculum design issues that were identified by the HEQC during the reaccreditation process prompted the appointment of a Dean to oversee programme design and align the qualifications with standard practice. The institution has “invested heavily in senior academic management staff”. When Len started at the institution, it was only he and a Dean that “looked after teaching and learning”, but since then:

*“There have been four senior appointments above me and many below me, so the structure itself has matured and all of these things happened because of feedback that we got from the CHE. So, if the CHE says you need more academic management expertise, we applied it.”*

The institution has thus reviewed its systems and structures to become, and remain, compliant.

Once the reaccreditation cycle is concluded, the institution regroups to review the process and feed back into improvement plans, if required.

*“It is from this type of feedback loop that we've learned that our governance structure was too complex. There were too many steps in getting any type of change approved, whether it's to curriculum, or to teaching and learning practice, or to the adoption of technologies. We quickly saw that ... a much leaner and more effective structure was required. So, we definitely go through that cycle... It is certainly not a case of putting something on paper that we don't experience in real life, or we don't intend to execute in practice, and by executing we often find out there are inefficiencies, a cost that can be cut, better service to the students that can be had, and we definitely have a fairly constant re-evaluation of how we do things.”* (Len)



Len indicates the institution adopts a “lessons learned” approach: Each query that the CHE highlights is applied throughout the entire institution and not just a particular qualification. The institution is engaging in reflexive practice and open to feedback from the CHE to achieve compliance, improve internal quality management and enhance quality.

#### PHEI4 IQM:

For this study, the institution is regarded as medium-sized with under ten programmes at the time of sampling. One participant, Holly, agreed to participate in the study.

The institution has been in existence for a while and thus demonstrates sustainability. It has a national footprint with sites of delivery across several provinces. Holly indicated that “All of the institution’s programmes contain a theme which addresses the aims of the mission”. The programmes are aligned to the mission to ensure that PHEI4 provides quality education that creates employment or entrepreneurial opportunities in the relevant sector at which its qualifications are aimed. It is indicated that the institution plans to become a “University College once the regulations are published, as long as we fulfil those criteria, and I sense we do”.

Holly explicated that the main governance structure is the quality assurance structure. To ensure quality, PHEI4 found that a purposeful and meaningful approach to the delivery of its programmes was needed – through a coherent and integrated organisational structure, which links the academic strategy to the institutional mission. The quality assurance structure is headed by the Council and Academic Board. The role of the Council is to guide PHEI4 locally and internationally, identifying current trends in a broader educational and industry employment sense. The Academic Board is responsible for the overall academic function of the institution and will manage, monitor, and control all processes associated with good governance and the implementation of sound learning and teaching approaches. Under the Academic Board are the following committees:

- Marketing
- Research and Development
- Academic Quality
- Monitoring and Evaluation

- Library
- RPL<sup>159</sup> and CAT<sup>160</sup>
- Assessment and Moderation
- Certification
- Student Representatives
- Disciplinary/ Grievance
- Appeals
- Bursaries.

The top structure for internal quality management is outlined below:

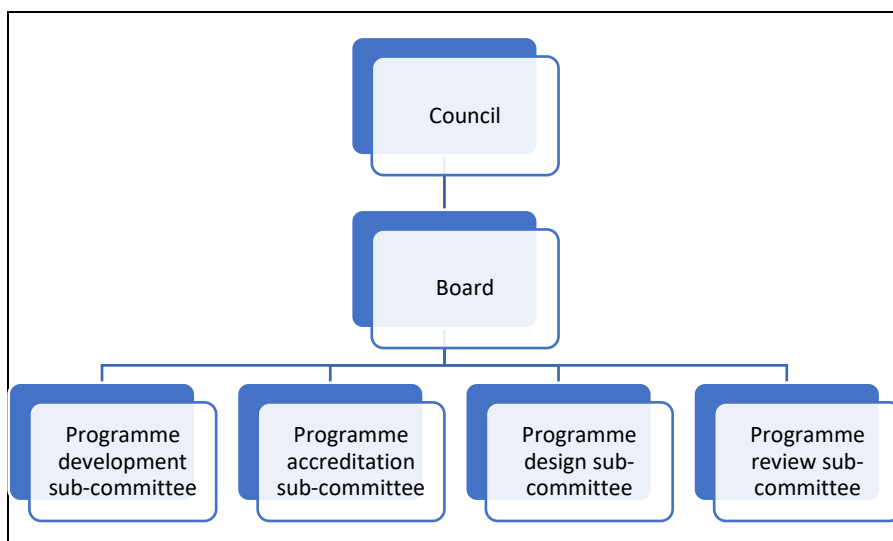


Figure 5: PHEI4 internal quality management structure

The institution employs 45 full-time and three part-time academic staff. It further employs 13 independent contractors “who teach and charge for this (they would be contracted to teach, assess, provide feedback and support) but may have a professional practice too”. There are a further 55 staff in support, administration, or management, thus a total of 103 employees across sites. A dedicated staff member is the national head of “teaching and learning and teaching and learning technologies”. The academic staff are responsible for programme delivery and some also serve on the programme design committee. A new programme design starts

<sup>159</sup> Recognition of Prior Learning

<sup>160</sup> Credit Accumulation and Transfer

with the programme plan, which is a “mapping document”. It visualises the end product and draws the links between components:

*“What does this graduate look like in the workplace? You've got to conceptualise the end product and that's the exit levels of the programme. What it is the student will be able to know, and do, on completion of the programme. Then there's a whole curriculum alignment model and then there's two sheets within that programme plan for every single programme, one of which looks at the developmental costs.” (Holly)*

Benchmarking is done nationally and internationally. The running costs, including staffing, equipment, and so on are factored in. Each programme has different requirements in terms of resources, facilities, equipment, etc. Therefore, each has a different pricing structure and budget costs. The institution does projections to see when it will reach the break-even point (getting development costs back) and enrolment figures needed for viability. The budget for reaccreditation is considered before commencement of the cycle:

*“I know that when a reaccreditation experience occurs, and if there's site visits, we've got a budget of a couple of hundred thousand for that.”*

An in-principle decision is taken regarding which sites are earmarked for programme provision:

*“If a campus doesn't have the infrastructure or the facilities, they can't run the programme. It's as simple as that. They're either going to get them, or they can't run it. We won't allow them to be accredited because it's our responsibility at our Head Office, at our National Office, to ensure that each site has the resources and the facilities and all the requirements, including the staffing, in order to run the programme.” (Holly)*

A realistic and holistic view of the organisation thus dictates how the programme plan will be implemented and quality assured and ensured.

When designing a programme, specialist knowledge is drawn from all the campuses for an integrated approach. The team will look at the entire programme: the courses

that make up the programme, knowledge building, scaffolding, credits, streams of knowledge and how they integrate across those streams. Not every academic is involved in the design of a new programme, but their input is gathered in the process.

*“For example, we've got a faculty member from (Site A), a faculty member from (Site B), a faculty member from (Site C), as part of the design team. The programme will then go out to the larger group of academics, to engage them in the process and to get input.”* (Researcher's insertion)

The institution, therefore, adopts a consultative and collaborative approach. Holly described the process of establishing the internal quality management system. It started about four years ago and took a substantial amount of time to engage, negotiate and obtain support from all stakeholders.

*“I think almost a year, of establishing that structure and getting buy-in from everybody and getting support from everyone and understanding as well. The same with the new HR structure that's had lots of engagement with everybody, so our process is very much consultative and engaging until we get everything down and they say, ‘Well, this is it’. If things don't get changed along the way, it's because it goes through Council or through the Academic Board.”*

In terms of programme review, there is an established system whereby the academics teaching the programmes can give feedback while the programme is being reviewed:

*“... to say what's working, what isn't working, what assessments are challenging, what input they would like to give, what changes they would like to see or improvements in the programme, and that's very much an ongoing project. Those minor reviews are taken in, and those are actually enacted every year, and then we'll go through a three years' big programme review update.”*

Any new and essential developments in the field are incorporated in the module content. Note that these changes do not necessarily constitute “significant change” that would affect the maximum 50% change to a programme as previously

discussed<sup>161</sup>. A knowledge update in a module is necessary for the programme to remain relevant and marketable.

The institution has internal checks and balances in place. The process is also qualitative and requires input and feedback from various stakeholders, which is considered and incorporated, viz. employers, practitioners, professionals who are in the field now or the professional body. There is thus information absorbed from the external environment that is channelled through the relevant structures in the internal environment. Student surveys on learning and teaching, and student experience questionnaires, are also utilised.

*“Our publications and design team will also get to read those surveys and that feedback and that actually feeds into what goes on in terms of content and learning and assessment as well.”*

The institution has undergone two reaccreditation cycles. The first cycle highlighted how “naïve” the institution was in its approach to quality assurance in higher education. Holly believes that with the new cycle on the horizon, the institution is better prepared as it has grown considerably. The institution had to do a self-evaluation report which encompasses programme design, as well as institutional matters (e.g. staffing, infrastructure, facilities) with which the institution concerns itself annually in terms of institutional reporting.

During the last reaccreditation cycle, six programmes were submitted for evaluation. Three programmes were reaccredited with conditions and three had their accreditation extended with conditions for teach-out purposes as these were not HEQSF-aligned.

The institution is in the process of establishing a quality culture in which role-players take quality assurance seriously and the quality focus is embedded in every role.

*“We've taken on the notion of quality, and not just quality assurance, but quality enhancement: How can we make things even better? How can we add value? How can we improve what we do? How can we make our students find learning exciting, for example? I now have a situation where I might have been, 10 years ago, the only one reading the documents from the CHE. I now*

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<sup>161</sup> See Chapter 5.

*have a team of colleagues who are just as passionate about reading the documents from the CHE. I've got a team that are just as concerned and conscious, as I am, about our quality and quality assurance. Even our CEO – he's the one driving the organisation from a strategy and a finance point of view – but he also reads the documents, which I think is incredibly good.”*

The top-down and bottom-up approach to quality and quality management is indicative of a quality culture that permeates the organisation. It is about “reading the documents” with understanding and intention to take constructive feedback on board for quality enhancement. The institution demonstrates trust in the external quality assurance process, in peer review, and a keenness to learn from the experience. PHEI4 demonstrates the ability to sift what is required for improvement in the organisation and a proactive team that is engaged and committed to effecting improvement.

The institution seeks to mirror the external quality assurance process:

*“Whatever CHE does, we have our own internal, similar process.”*

This is a sensible approach, but it can only be successful in achieving its purpose if the requirements of the CHE are clear so that the institution can set about implementing accordingly. The institution understands<sup>162</sup> the regulatory framework.

*“I'm aware of that triad<sup>163</sup>. It's very clear to me and to my colleagues what that relationship is.”*

As per the above, it is evident that the institution does not fit into the DHET participant's trio of reasons<sup>164</sup> as to why institutions do not achieve compliance. The institution is stable, progressive, and innovative. It absorbs the information received from the regulators to stay informed and effect improvement, thus indicative of an open system. For example:

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<sup>162</sup> See discussion (PHEI2, PHEI3, PHEI6) around the need for self-study of the relevant documents and clear communication.

<sup>163</sup> The requirements of the CHE, SAQA and DHET.

<sup>164</sup> The DHET participant indicated: i) a lack of understanding of accreditation; ii) not being able to keep abreast of changes in the sector and in the system; and iii) changes in personnel at the institution itself.

*“We've also used, as a guiding document, a recent guide that came out on the new reaccreditation<sup>165</sup> process. Even things like the new certification norms, we read thoroughly. A number of my colleagues went through that. We made comments on it. We met together as a committee. We've got a Certification Committee. Those norms informed a lot of our improvements in our QA structure, this year, and last year... it was such a good informative document that we decided to take on a lot of those processes anyway because it improved our own quality assurance of the certification process from registration of the student to completion of the student.”*

The various quality committees convene to engage in the internal reaccreditation process:

*“We're aware that this is going to happen, so this comes into our committee meetings in terms of: What are we doing, what do we need to do now, what preparation is needed, what assurances are needed and what staff need to be involved? The quality committees – we have a national quality committee, there's a quality committee at each campus that feeds back to the national office – so, there's a 360-degree relationship there.”*

Programme reaccreditation is not viewed as a standalone process but is integrated into internal quality management. Holly indicates that significant strides have been made since the last reaccreditation cycle. It is being addressed more comprehensively, holistically and systemically. Historically, the internal quality assurance processes were there but they were not as systemic nor as well structured as they are now.

*“The measures that we've put in place, in particular in the last two years – and you probably could take it back to four years because of programme accreditation, distance learning programmes not being accredited because we didn't do good enough submissions. We've just recently done some distance learning submissions which are incomparably improved. They're incomparable to the previous submissions because we needed to do that work and improvement. I would say it's not so much of what we need to put in*

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<sup>165</sup> The introduction of institutional audits will deliver an outcome on programme reaccreditation.



*place. The only thing that we're busy somewhat refining, is our HR structure, which for me is the final piece of the puzzle and that's done."*

The empirical evidence reveals that the institution is refining some of its processes. The system is functional nonetheless in terms of serving its purpose, that is, to manage for quality, and to enhance quality.

#### PHEI5 IQM:

For this study, PHEI5 was identified as a medium-sized institution (with up to ten programmes). One participant, Gail, agreed to participate in the study.

PHEI5 is a non-profit company. The institution regards itself as "relatively small". It started in a niche market but has broadened its suite of programmes over the years. The institution operates across multiple sites of delivery. Not all programmes run on all campuses.

Various staff members fulfil different roles. The Executive Committee (EXCO) is the decision-making body. It comprises the heads of all the divisions within the institution, including the Head of Academics who is also the Head of Academic Quality Assurance. These are two demanding positions, and it is indicated that the institution is in the process of recruiting a Quality Assurance Manager. Similar to PHEI1 and PHEI6, the need for establishing this position seems to come to the fore in terms of the demands in the quality assurance process and growth of the organisation.

(With the expansion in the number of sites and planned new programmes)  
*"life has got quite complicated and busy. We need a QA person who can handle specific aspects of academics."* (Gail)

The other impetus for creating the new management position is the move by the CHE towards institutional audits.

The institution is also in the process of appointing programme managers to support the Deans. The workload has increased, particularly due to preparation for the institutional audit and with more programmes and sites to manage. Currently, the Head of Academic Quality Assurance is responsible for the programme accreditation and reaccreditation processes and ensuring that compliance is achieved. Gail

indicates there is a comprehensive quality assurance process concerning academics, which is based on gathering data from multiple sources to inform the curricula – “things like content and being up to date with what's happening in the real world”.

The other quality aspect that receives attention, with multiple campuses, is that the students’ learning and experience on those campuses – and lecturers’ experience on all of those campuses – is similar so that there is parity across campuses. Each campus is a “mirror” of the other in terms of venues, equipment, libraries, among others. The institution has an e-library as well.

The budget is pooled, and planning dictates the spending on each programme. Programmes are centrally designed. The lecturers on the different sites would then receive the same material, pacing, assessments, and so forth to ensure consistency across the board. Each lecturer does a subject report every term. They evaluate what has been taught and relate student performance.

A large number of lecturers are industry-based, and “so they might say ‘all this stuff is very outdated, we haven't done that in ten years’”. The feedback is included in the subject report which is submitted to the Dean who is in charge of keeping the course current. This indicates that the institution is open to feedback from the external environment, which is channelled through the relevant structures in the internal environment.

A basic depiction of the internal quality management system is presented below:

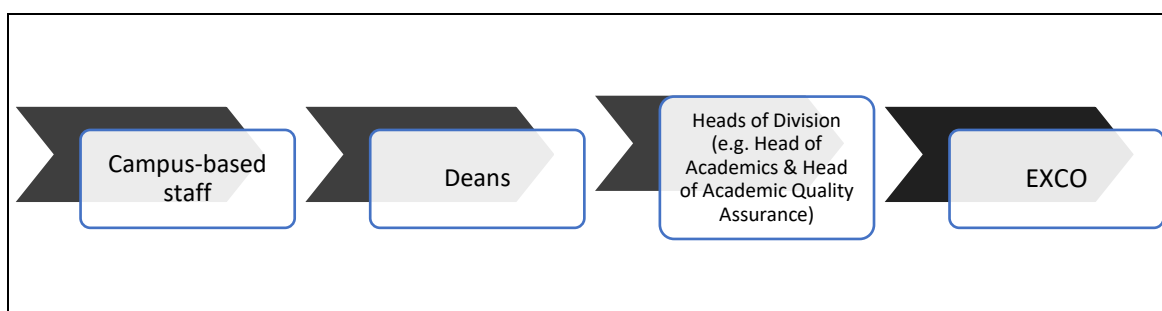


Figure 6: PHE15 internal quality management structure

The institution has three levels of moderation. Internal moderation requires specific assessments to be moderated by another lecturer. Internal moderation reports are submitted to the Dean.

External moderation of samples of work from all of the campuses is done by external qualified academics. The institution moved to digital moderation in the previous year. Before COVID, external moderators had to be on campus. Logistic arrangements had to be made, at the institution's expense, to have different moderators at the different centres.

The third level is national moderation, which is done once per year. The moderation report of each campus is discussed with the academic team and campus staff. Feedback from experiential training is also considered to provide insight into how students are perceived by the industry. This is another example of input from the external environment that is taken on board.

As part of the programme review, the institution does a graduate survey, whereby student opinion is canvassed regarding employment or further studies. Tracer studies are done:

*“We can track, for instance, this latest professional body review that we had for a Higher Certificate. From that Higher Certificate, over 60% of the students go on to further studies. It really means that Higher Certificate is serving its purpose extremely well, which is to give access to students into a very specialised field of study.”*

The institution has done a longer-term graduate study. A course review and lecturer review are done twice a year that the students fill in. There are multiple inputs from industry, students, and staff which provide insight into the programmes, specific subjects and pass and throughput rates. At the end of the year, an analysis is done. Gail indicates that there is “a huge amount of data” which, as a small institution, is “possibly not analysed quickly enough”. The institution has improved on this front through utilising software and assigning certain responsibilities to an administrator. Although the analysis and providing feedback that campuses, lecturers, and Deans can implement quickly “is a little bit of a slow process”, it is viewed as thorough and rigorous.

It is indicated that lecturers, although they are involved, might believe that their role in the internal quality management process is not substantive or their input is not considered. Gail considers this a gap in the process and “a bit of a quality assurance challenge in terms of closing the loop”. The lecturer “teaches four or five modules

and goes off to run their business” which implies limited engagement beyond the classroom<sup>166</sup>.

The institution has approximately 20% full-time staff. Gail finds that, in comparison to a public institution, the institution has a “much higher percentage of part-time academic staff”. The institution’s context is similar to PHEI2 where there is heavy reliance on industry experts to teach on a part-time basis. Staff training, on learning and teaching, assessment, among others, could be campus-based or led by the national team.

The institution has participated in at least two reaccreditation cycles. In the last cycle, seven programmes were submitted for reaccreditation. They were all reaccredited (a few with conditions). Its next cycle coincides with the implementation of institutional audits.

Lecturers are involved in programme design and review, or at minimum provide input in the process, regardless of being a full- or part-time staff member. If there is no in-house expertise to design a specialist module, this could be outsourced. The Dean is responsible for quality assuring the programme design and review processes.

The Head of Academics-cum-Head of Academic Quality Assurance is primarily responsible for the programme reaccreditation process. The incumbent defines all the parameters that need to be addressed, based on the requirements from the CHE, coordinates the process and collates the input. In addition to programme-specific information, the incumbent liaises with the different divisions, i.e. HR, Finance, the Registrar’s office, and so on. There is regular interaction in these areas. Data from the annual DHET report is also considered.

Gail regards the lack of a formal process for external peer academic and stakeholder review as a weakness in the internal quality management of programme reaccreditation. The process, overall, is not regarded as rigorous enough at present. The weaknesses in the internal quality management system have been identified and it is anticipated that the new staff member will add value in this regard. To a large extent, the national structure instructs campus staff and there are consequences for not meeting quality requirements. The national office monitors and

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<sup>166</sup> See discussion in Chapter 5 on part-time staff and opposing views on the level of commitment.

provides feedback regularly. Therefore, it is more a top-down approach than an integrated, collaborative top-down and bottom-up system.

The institution does self-evaluation and external peer evaluation needs to be incorporated in its revised processes once the new manager is appointed. There is reflexive practice and the intent to enhance quality.

### PHEI6 IQM:

For this study, the institution is considered a small enterprise (between one and five programmes). It offers programmes in a specialised field. One participant, James, agreed to participate in this study.

The institution is a not-for-profit company that is governed by a Board comprising overseas and national representatives drawn from various bodies including higher education institutions and government. The Board provides strategic leadership. The senior leadership and management staff serve on the Executive Committee, comprising the Chief Executive Officer as Chairperson, Registrar, Executive Dean, Director of Operations and Director of Quality Assurance. The CEO plays an active role in the quality assurance structure. Each member on the EXCO is responsible for a specific department, for example, the Director: Operations manages staff, finance, infrastructure, and resources. An Administrative Dean oversees administration including administrative matters pertaining to the Faculty. There is one Faculty at present, with an Executive Dean as the leader. The Teaching and Learning Committee oversees the T&LC clusters. The institution has relevant policies and procedures to support operations and interdepartmental collaboration.

James indicated that the quality assurance unit is positioned above all the other units or functions within the institution:

*“Everything is basically convened by your quality structures that are in place.”*  
(James)

It is further indicated that the institution benchmarks its day-to-day activities based on what is intended for stakeholders, namely students and industry, and in terms of public institutions “in society at large”. Students evaluate their classes and lecturers regularly. There are various formal structures in place, such as the teaching and learning committee. The Head Lecturer and faculty are responsible for the content,

content delivery, students at risk, and so on. The Faculty Board and Academic Board assess whether objectives are met, or intervention is required and whether improvement needs to be made. The review process is followed in all the areas of the organisation, namely Faculty, operations, finance, and administration. Senate is external and includes student and industry representatives that provide feedback. Industry involvement spans internships and feedback on the relevance and standard of a qualification. A simplified presentation of the internal quality management matrix is as follows:

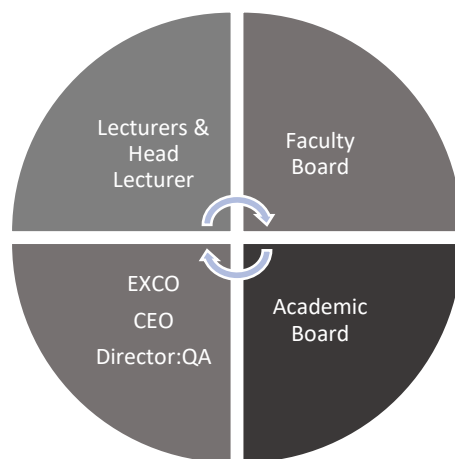


Figure 7: PHEI6 internal quality management structure

The institution has established partnerships with a few international universities whereby a “full audit” is done every five years by external peer reviewers for institutional benchmarking with international accreditation standards. This is an example of input from the external environment that is beyond the norm.

The audit is a week-long engagement that entails:

*“They speak to management, speak to staff on different levels, with students on different levels, speak to the alumni, speak with industry. They take a look at evidence, going from curriculum to delivery, to assessment, maintenance of records and so on.” (James)*

The institution thus seeks to establish the credibility of its programme offerings for the international mobility of its students. As found with PHEI1, the institution does not view quality assurance as merely “ticking boxes” but “something that comes from within”. The internal review process is described as “intense”, with every assessment

cycle moderated and analysed in an attempt to close “loopholes”. The institution is mindful that it could fall into the trap of “too much administration” which could be a burden to staff and add to overheads. It has consequently invested in Bizmind to achieve efficiency in the system. As described by James:

*“It is a workflow process management system where you can create your own policies and your workflows and your processes that gives you the dashboards immediately and basically queries all the other systems that we have online immediately so that you really can see what is happening.”*

To further explore organisational efficiency, the institution has started a research group around Decision Intelligence. As explicated by James:

*“Decision intelligence is basically taking a look at management structures within an institution. You know, we've got, of course, the whole evolution from the medieval style through to the more managerial type of style today. We take a look at how to manage higher education institutions, how we are doing things because of what is in the public space and what has been expected, and then questions about academic freedom and we've got questions about research, fundamental research, polarisation of PSET and how do you make decisions. We are now taking a look at decision intelligence and taking a look at how you measure your different engagement styles, how you measure your activities and return on investment of activities, towards research so that you get really a return on investment on what you are basically doing.”*

The research focus indicates internal reflexive practice for quality enhancement and organisational effectiveness. The institution is continuously on the lookout for innovative methods to inform internal practice which is why it has also joined the University Innovation Industry Network<sup>167</sup>. As elaborated by James:

*“They query industry and university interaction and technology transfer. We embarked now on a pilot programme with them to basically create a framework to map your third mission<sup>168</sup> engagement and communication,*

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<sup>167</sup> <https://uiin.org/>

<sup>168</sup> The “third mission” is community engagement.



*return of investment and so forth. They've got some wonderful programmes also around entrepreneurial university and so on.”*

The UIIN has a European base and has predominantly online interaction with its members. Although international alignment could prove beneficial for a business-cum-education entity such as PHEI6, the institution should not lose sight of the African context, and uniquely South African context, in its research focus. The institution attends international conferences, such as those organised by the Global University Network for Innovation (GUNI<sup>169</sup>), which works closely with UNESCO, and finds these international engagements worthwhile. The international focus probably arises from the fact that the institution has a European footprint, with “global staff” that comprise “not just academics – that is, of course, also your professional support staff and your other support staff that you need regarding maintenance and other services – there we are sitting with 130, 134, staff members”. The academics (across three local sites of delivery) total over 40 staff excluding visiting professors and “a number of industry part-time or ad hoc members that often come and offer certain parts of a subject, of how it is being filled in the industry”. In a bid to retain staff, the institution has staff development programmes in place, including subsidisation of formal studies up to the PhD level.

The empirical evidence indicates the institution, like PHEI1 and PHEI4, is adopting a proactive approach towards internal quality management. It draws on its local and international network of industry experts and academics to implement a participative education model that permits direct employability for students. It employs a risk-based approach, for example, the budget allows for contingencies (as found with PHEI4). It is trying to streamline and implement efficient and effective processes to alleviate the administrative burden on staff. The institution uses reflexive practice resulting in measures for improvement. It plans to revise the internal quality management system by establishing a dedicated quality assurance unit to better respond to and meet external quality assurance requirements.

#### PHEI7 IQM:

For this study, the institution is considered medium-sized (between six and ten programmes). One participant, Alex, volunteered participation. Judging from its suite

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<sup>169</sup> <http://www.guninetwork.org/>

of programmes during document analysis, it appears that the number of programmes has increased since sampling was done for this study. The institution offers vocational, academic, and professional programmes which are aligned with the vision and mission of the institution.

The institution has been in existence for many years and operates over multiple campuses. It has over 2000 students enrolled across programmes and sites of delivery. The campuses are networked; therefore, students can access from any site. The sites of delivery are suitable equipped, and, with COVID, all activities have been managed on the online facility. The institution has invested heavily in IT infrastructure.

A basic schematic of the internal quality management structure is provided below:

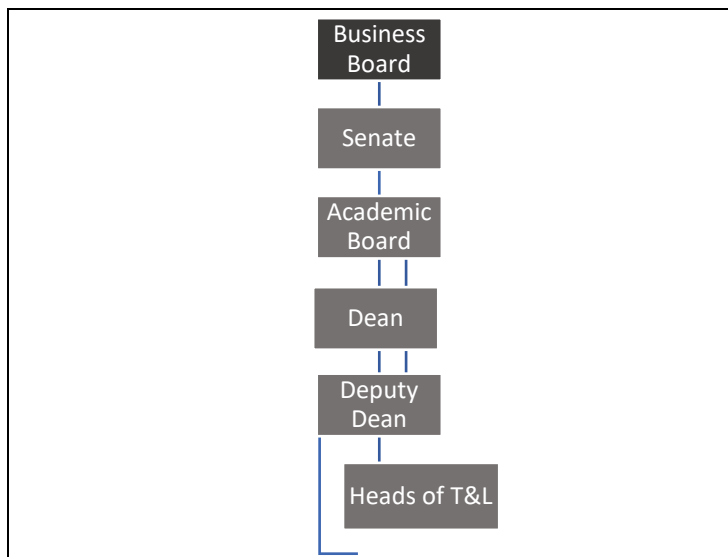


Figure 8: PHEI7 internal quality management structure

The institution’s internal quality management structure includes three key positions: i) the Head of Teaching and Learning who is the academic head per campus, responsible for the quality of learning and teaching on the site; ii) the Head of Teaching and Learning is accountable to the Deputy Dean; and iii) the Dean is responsible for all internal and external quality assurance. Other key stakeholders in the process are Heads of Faculty, Academic Programme Developers, Programme Coordinators, Head of Work-Integrated Learning, and the Academic Manager.

Three-monthly reports are prepared which are submitted via the Dean to the Academic Board that meets thrice per year. The Academic Board reports to the

Business Board. Improvement plans are drawn up if weaknesses or corrections are identified. The institution participates in the evaluation processes of the relevant professional body and incorporates the feedback into its review processes.

Over the past year, the institution has established faculties for each field in which it offers programmes. Four faculties are managed by Senate. As the institution grew, the structure became more complex, with accountability built in at each level.

All the lecturers, whether full-time or part-time, are involved in the quality management process. The institution employs a large number of part-time staff due to the 1:25 lecturer-student ratio. The part-time staff are practising specialists. There are over 140 teaching staff across sites of delivery. All staff are required to do self-assessment and assessment by the Head of Teaching and Learning. Once per term, students provide feedback on the lecturer. On a term basis, the lecturers provide feedback on the modules that they teach. Once per year, a climate survey is done with lecturers to gauge the areas in which support, input and development are required. New staff undergo “intensive training” and there are several continuous professional development opportunities available to all staff.

The institution has undergone at least three reaccreditation cycles with the next coinciding with institutional audits. The last cycle was five to six years ago. Besides a few exceptions of fully reaccredited programmes, the rest were reaccredited with conditions. The number of reaccreditation cycles already completed is indicative of sustainability, and an open system that has is functional to produce the required output.

It is evident that the institution does reflexive practice and engages with stakeholders during the review of the programmes. It displays sustained growth and commitment to quality higher education provision.

### **6.3 BARRIERS OR CONSTRAINTS IN ACHIEVING COMPLIANCE**

The terms, “barrier” and “constraint”, are defined for this study as follows:

- i) Barrier: “something immaterial that impedes or separates”/ “wall”/ “fence”, e.g. behavioural barriers (<https://www.merriam-webster.com/dictionary/barrier>).
- ii) Constraint: “a constraining condition, agency, or force”, e.g. budget constraints. (<https://www.merriam-webster.com/dictionary/constraint>).

### 6.3.1 Barriers or constraints experienced by participants

The participants are clear that there are barriers to achieving compliance, and some of these are common experiences.

One of the PHE association participants identified a barrier presented by the regulators that impeded her efforts at achieving compliance and incurred criticism from her supervisor:

*“... there’s only so many people to do the things at CHE to do the audits and do the site audits. All of them are struggling ... They’re telling you my programmes are through in three months, six months, done and dusted, but ... All of us have the same SAQA problems. All of us have the same DHET problems ... I have to address it ... it’s frustration, and it’s not you. It’s your boss who thinks you’re not doing anything ... Then I say: What must I do?”*

The perceived resource and capacity constraints that exist in the regulatory space are barriers that cause disgruntlement. Suitably equipped staff should be identified and contracted and capacity-building done in areas where weaknesses are identified. This is not unique to South Africa, as Hoosen *et al.* (2017, p.13) identified that one of the weaknesses in existing quality assurance systems in SADC is the “lack of QA capacity at the institutional and national level” and that participants in their study identified capacity building and “enhancing QA skills in their institutions and agencies” as a priority.

The “Overview” in the CHE’s *2018/19 Annual Report* includes reference to the broad scope of work under the CHE’s mandate whilst the staff complement is insufficient, with “critical gaps” in the organisational structure and some vacancies that need to be filled (CHE, 2019, p.14). The Annual Performance Plan target to fill 85% of “approved posts on the organisational structure” was not achieved since remuneration was not competitive to attract competent human resources (p.50). The staff turnover rate is 14.28% which is higher than the higher education sector benchmark rate of 8% (p.14). This causes loss of skills even in the upper echelons of the organisation, which has compelled it to implement short-term measures to mitigate risk, which includes ongoing training and capacity-building of staff. There is

limited opportunity, though, for career progression within the organisation (p.22). The CHE has identified human resource strategies that will enable an agile organisation with flexible, adaptive, and integrated work delivery models for optimal utilisation of resources for the various functions, and talent management to ensure a leadership pipeline, knowledge transfer and continuity (2019, p.40).

Besides the abovementioned capacity constraints, concerns about the external quality assurance process itself can lead to dissatisfaction, as explained by one of the SAQA participants who identified an issue that is a barrier for the institution in achieving compliance to offer the qualification:

*“According to me, SAQA should be receiving qualifications that meet the criteria, in actual sense. It also says to me it’s that trust issue ... because the QCs will submit qualifications that do not meet the criteria – to SAQA, for registration – and I’m asking myself why do the QCs recommend qualifications that do not meet the criteria? It really put us in collision – more with the providers – because a provider asked me: ... ‘They said it’s okay. You are telling me it’s not okay. What is really happening here?’ So, we are really on a collision path with all the parties because of that ... If a qualification is submitted to us and it has only one sentence in terms of the rationale – it doesn’t answer the five questions that we’re asking – and it has been recommended, we will ask how did it pass through the processes ... without that being picked up.”*

The issue relates to trust among the stakeholders, and how inefficiencies or ineffective processes negatively affect the relations between stakeholders. This indirectly heightens the level of scrutiny and highlights the need for more robust measures. It is noted that SAQA and the CHE each have evaluation processes in place, each with a different focus and serving a different purpose, and dedicated staff to perform duty in the respective processes.

As stated by the fellow SAQA participant:

*“As I mentioned, when we evaluate, sometimes what happens is that we do see that the qualification document is not properly completed... when the provider submits documentation (for accreditation)... they also submit the qualification document. But in the accreditation process, there are some*

*changes done between CHE and the provider, but the qualification document has never been updated. And when we get it then people will say that the content between what they do and what they've got accreditation for and what is on the system is not always the same.” (Researcher's insertion)*

Amendments made through the accreditation process, therefore, need to be included in the application to SAQA to ensure that the qualification document contains the correct information for publication. The CHE, SAQA and DHET's combined new application form<sup>170</sup> that is to be implemented from 1 January 2022 will provide access for all three parties to the same data to eliminate duplication and discrepancy, and indirectly presumably build trust among stakeholders through a more transparent process. The sector has been apprised of the new application form which aims to achieve a more streamlined and efficient approach to the regulatory process. The existing process is characterised by delays, as indicated by some participants:

*“I think the trust is there and the confidence is there, but the complaints we get are around the delay in receiving the outcome.” (DHET participant)*

The DHET participant identified the following barriers for private higher education institutions in achieving compliance: i) a lack of understanding of accreditation; ii) not being able to keep abreast of changes in the sector and the system; and iii) changes in personnel at the institution itself. The staff “who have been dealing with accreditation, SAQA, etcetera, are no longer there or they have been moved around or there's a completely new ownership, management, etc.” and the new staff “don't really know how the accreditation functions, so things begin to fall apart at that level”. It was further indicated that, new ownership as in the case of mergers and acquisitions, could impact programme reaccreditation or the registration amendment cycle negatively if the new staff handling this portfolio are not familiar with the issues. A further challenge is that consultants might have been contracted to design the programme, but post-accreditation the institution has to manage by itself.

*“I think with a lot of the privates, accreditation in higher education is a huge challenge because it's a case of building a whole new curriculum all over*

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<sup>170</sup> QAF, p.10 (CHE, 2021a): The DHET, SAQA and the CHE are working on a collaborative project to develop a single shared online platform for the approval, accreditation and registration of qualifications.

*again, and one that needs to be sustained within the institution post-accreditation. That is where they fall apart as well because they get consultants to come in, who submit an application on paper and, once the programme is approved, the consultant steps out. So, it's a continuous maintenance of that process that is a challenge internally.” (DHET participant)*

This points to a lack of capacity within the institution which is a constraint if the development of staff is not done in this and other areas, such as learning and teaching and assessment.

Capacity constraints could affect quality management, quality learning and teaching, assessment, programme design and review, among other operational, leadership and management areas. The DHET participant notes that consultants are sometimes contracted to assist the institution with its accreditation and registration process. This could be from the programme design phase up to programme reaccreditation. The use of a consultant, as discussed above, points to capacity constraints, and financial constraints:

*“... it's cheaper to have consultants and fewer staff to manage the institution and so, in going for that approach, they're actually sacrificing quality.” (DHET participant)*

This study commenced on the premise that there might be structural or systemic constraints that would prevent institutions from achieving compliance in certain areas. However, the PHEI1, PHEI4, PHEI5, and PHEI7 participants disconfirmed the supposition that all institutions might experience structural constraints. The institutions are in a strong position in terms of staffing capacity, financial resources, infrastructure and facilities, governance, leadership, and management to enable sustainability and longevity. All PHEI1's programmes that served for reaccreditation during 2015 were reaccredited, without conditions. Since its last cycle, PHEI4 has made significant organisational improvements to address concerns identified by the HEQC, which is illustrative of an open system. Holly indicates that, for most of these concerns, insufficient or poor-quality evidence had been provided. Both institutions indicate that they are prepared for the next programme reaccreditation cycle. PHEI5 indicates that there might be restraints in spending the budget, but there were no



structural constraints. Gail indicates that there was an issue regarding the lack of full-time staff which has since been addressed due to the CHE's feedback in the matter.

The institutions might experience barriers or constraints brought about by the regulatory process. The "administration and application processes around adding new programmes, or concluding reaccreditation processes, could be deemed a constraint" (Len).

The barriers or constraints identified through empirical evidence are outlined below.

#### PHE11-7 findings:

The empirical evidence shows that the following barriers or constraints to achieving compliance with the quality requirements of the HEQC are experienced by PHE11 to 7. The reasons for non-reaccreditation or conditions for reaccreditation as indicated to the institutions include: i) concerns around staffing including workload allocation and full-time to part-time staff ratio<sup>171</sup>; ii) programme design concerns, such as articulation, module content or sequence of modules; iii) issues about external moderation, for example, evidence of external moderation at exit level of the programme; iv) programme title changes to be made; v) lack of appropriate or adequate library facilities and/or resources (and the need to develop and implement a library improvement plan to ensure that students have access to sufficient resources whether physical or digital); (vi) non-approval of site(s) of delivery; vii) general rules of Credit Accumulation and Transfer (CAT) being applied when students graduate with a Higher Certificate and then register for a Diploma; viii) evidence of correct admission requirements to an undergraduate programme; ix) policy on the provision of learning materials; x) budgetary provision for supplementary study materials; xi) evidence of management oversight in terms of admission of students, assessment processes and moderation processes and that administrative staff only fulfil an administrative role in these areas; xii) a plan with timeframes that result in the provision of appropriate office spaces for academic staff to work and consult; xiii) a programme that had no enrolled students for a few years in succession; and xiv) no (suitably qualified) librarian.

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<sup>171</sup> cf. accreditation criterion 4(ii) (CHE, 2004b, as amended): The programme has an appropriate full-time to part-time staff ratio to ensure working conditions conducive to teaching and learning and research. Part-time and junior staff and tutors are trained, where necessary, and monitored by full-time staff.

Regarding the concerns identified above:

- Holly (PHEI4) indicated that one site of delivery was not approved during the previous reaccreditation cycle, therefore the programmes were to be placed on notice of withdrawal of accreditation. The institution had to submit a detailed improvement plan and six months to submit a progress report for achieving better equity of provision at the site. A period of one year was given to effect improvement to the quality of the programmes. A site visit was conducted following which the programmes were reaccredited, and the site was approved with short- and long-term conditions. This confirms the functionality of the system to produce the required output, i.e. a reaccredited programme.
- The PHEI2 participant indicated that students hardly make use of the physical library although stock is replenished and expanded. However, this is a requirement in terms of accreditation criterion 7, particularly 7(v): On- and off-campus students have adequate library support and adequate access to library research and computing facilities. In this regard, the standards, criteria and guidelines for the new QAF should consider how the needs of contact and distance learning students can be met in the digital era.
- Abby indicates two barriers that present an ongoing challenge:

*“I’ve been with (the Institution) since 2008, and since 2008 we fight about this, every time when the campus moves or there’s a new programme. It’s always the library and the part-time staff.”*

Gail (PHEI5) experiences recurrence of the same barriers above. Heavy reliance on part-time staff is illustrative of capacity constraints. The “casualisation of academic staffing” is found at public institutions as well where there is an increased reliance on short-term contract staff based on “financial efficiency” (CHE, 2016, p.82). Abby (PHEI2) relates one of the biggest constraints for her institution is trying to “convince the CHE we cannot have full-time people because they don’t have the industry experience. Our students will teach them”. This is a predicament for the institution as it would need to provide adequate motivation in terms of accreditation criterion 4<sup>172</sup>, i.e. present reasons why its staffing model needs to be considered appropriate, in terms of context and fitness for purpose, and student-to-staff ratio. The institution

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<sup>172</sup> CHE, 2004b, as amended

would need to illustrate how it would address the deficiency, if any, in terms of staff research capacity, or lack of mentorship or academic leadership in the programme, lack of adequate or timely student support or other constraints that could arise due to shortage of permanent staff. Abby indicates:

*“Nationally, we all use the same course, so it's a national work distribution. So, it's impossible for us to have five or six full-time people on campus. They are not subject matter experts, so that is something that I think the CHE do not understand.”*

The understanding of what constitutes the standard around staffing (or ratio of full-time to part-time staff) or what constitutes “higher” education might differ between the two parties. As iterated by CHE Participant 2:

*“If you've got a person with industry knowledge, as well as the academic qualifications, that's great ... Everything's about that knowledge project, the theoretical understanding... in the higher education space it's about the depth of knowledge and the complexity of knowledge.”*

Higher education, therefore, is about more than enabling employability; it is *inter alia* about the academic pursuit and preparing students to do independent study, become critical thinkers, enable progression to further study and development of research skills so that knowledge producers may fill the gap identified in the NDP2030<sup>173</sup>. Abby indicates that the institution has a business-to-business relationship which could be a structural constraint if it caters for a particular need in the industry only. Shay (2017) indicates that, globally, higher education institutions are moving to develop graduates with a larger skill set than traditionally produced (*sic*). It is also pointed out that the CHE calls for the development of a particular kind of graduate that is exposed to a broadened curriculum and lays the foundation for critical citizenship (*ibid*). Shay posits that the “breadth” would include “opportunities for electives outside the discipline and the promotion of interdisciplinary thinking”. The PHEI5 participant, Gail, indicates that the institution is casting its focus beyond the current niche market:

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<sup>173</sup> (Republic of South Africa (RSA), National Planning Commission, 2012), p.59

*“These days there’s such a lot of cross-disciplinary programmes. I would say that’s the territory that we’ve moved into – to acknowledge that quite often industry and careers are demanding broader skills and a broader knowledge base from graduates rather than back in the day when you were a photographer. These days, photography is not a viable career without being able to do all those other things that used to sit in, I want to say, different territory... for instance with digital marketing and communication, you can’t just be a communications specialist. You also need to understand design; you need to understand software; you need to understand community; writing, visual literacy; all these things.”*

Having a particular industry focus, as in the case of PHEI2, does not mean the institution is not successful through its approach, or that its programmes are not valuable and marketable. On the contrary, although positioned in a niche market, it has demonstrated sustainability, is addressing the particular needs of industry, and its alumni progress either through employability or further study.

Part-time staff might be drawn from the alumni, which means they would need to be suitably qualified and experienced in higher education teaching<sup>174</sup>: “many of them came through our qualifications, even went externally and got a Master’s Degree or MBA, but they work in industry” (Abby). The institution needs to motivate that the students’ learning experience is enriched as accreditation criterion 4(iv) requires that “The academic staff complement is such that it ensures that students are exposed to a diversity of ideas, styles and approaches”. Furthermore, it should address accreditation criterion 4(v): “Contractual arrangements relating to the hours and workload of staff ensure that all programme quality assurance, teaching, research, learning support, materials development, assessment, monitoring of part-time staff (where applicable), counselling and administrative activities take place”. The institution thus needs to demonstrate how internal quality management takes account of its staffing model.

Besides the fact the staffing model is custom to the management of learning and teaching in the institution, Abby indicates that part-time staff are reappointed – up to

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<sup>174</sup> cf. criterion 3 (CHE, 2004b, as amended)

ten years for some. Thus, employing part-time staff does not necessarily correlate with high staff turnover.

The constraints are two-fold, i.e. both financial and structural. As elucidated by Abby:

*“It’s not economically viable to have a lot of full-time staff members and to buy huge library books. That’s the two main concerns. So, it’s financial. We just cannot understand why it’s expected from us and that’s our structural problem.”*

- Len (PHEI3) indicates impediment to organisational growth: Private providers need to take care with expenditure since they are not subsidised, which “makes it difficult for us to flourish in the postgraduate space” and “constraints keep us from growing into the institution that we want to grow as quickly as we want to do it”.
- The PHEI6 participant (James) recounted that the institution has had three programme reaccreditation cycles thus far. The first reaccreditation cycle, over 15 years ago, was not initially successful but following an appeal, the programme was reaccredited. The second process “went very smoothly” and the third “not at all”.

In the last cycle, accreditation was withdrawn for two programmes (that had produced a graduated cohort). James regards the reasons for withdrawal of accreditation in the last cycle as vague despite having queried the deficit perceived by the HEQC. The institution appealed the decision for which a site visit was conducted for verification purposes. Following evaluation, both programmes were conditionally reaccredited, and the last of the conditions were recently met, which means the process took about five years to conclude – a substantial amount of time that has elapsed since the cycle was initiated. The participant believes that the online process followed by the CHE is “not a good system for the reviewers” as it is not “content-rich”. In other words, a barrier to achieving compliance could be the HEQC-online system that does not cater for various forms of documentation to be uploaded which could mean the peer reviewers do not have access to all the information that the institution would have wanted to submit (as indicated by PHEI6) – it is noted that hardcopy documentation is not accepted. James regards the concerns raised as not being “structural”, or not material to the criteria for accreditation but rather a pedantic

observance by the peer reviewer(s)<sup>175</sup> which harbours on being prescriptive. Len (PHEI3) expresses a similar view. Feedback on evaluation reports is often vague.

An example is cited:

*“The evaluation typically says something like insufficient library facilities but there's no real guidance given around what would be a sufficient library facility: 10,000 more books, spending 100,000 more per year, more reference materials? There's very little clarity around that. At three consecutive institutions where I've worked, very different institutions – one a fashion school, one a design school, one a business school – the same type of feedback comes back and then you put more money into it, you expand your library, but you're doing so completely blind<sup>176</sup>.”*

Alex (PHEI7) indicates that the institution has rarely encountered an issue with library provisioning. The recurrent concern of the HEQC has been around the part-time staffing model. This has prompted the institution to regularly review its model and the philosophy around that. As student enrolment and the suite of programmes grows, the participant considers it relevant that the CHE challenges the institution on its practice and that more full-time staff should be employed, and a research agenda followed. The institution acknowledges the systemic challenges in the private sector with part-time faculty and research.

Systemic barriers that arise from the process are: i) protracted timeframes for proceedings (deferral, representation or conditions) and linked to that financial loss due to non-enrolment of students if an improvement plan is in the process; ii) protracted timeframes for registration; iii) miscommunication and the lack of clear guidelines on the accreditation process; iv) delayed site visits, particularly as a result of the pandemic; v) follow-up site visits in the case of improvement plans which lead to delayed administration; vi) inability to market the programme because this is dependent on accreditation timeframes. As indicated by Len (PHEI3):

*“I think institutions would appreciate more transparency on where they are in the process. That allows them to plan their resources and expenses around it, and when to start marketing. Obviously, you can't start marketing until you've*

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<sup>175</sup> cf. Chapter 5: evaluator bias

<sup>176</sup> cf. accreditation criterion 7(iii) (CHE, 2004b, as amended)

*had all three ticks. But you (can) schedule your marketing cycle to coincide with the three ticks. A private provider is very dependent on scheduling, on budgeting, on planning resources, and if they knew more around what to expect from the CHE and how these processes will play out on a timeline, it will make planning on their end a lot easier and would save a lot of costs.”*

The above relates once again to the quality of a paid service, and the need to be efficient. The structural constraints experienced by the Quality Council refer.

PHEI6 finds an internal weakness (lack of understanding of the requirements which leads to non-(re)accreditation) due to an external barrier:

*“We should have maybe a separate service department that really speaks the language of the CHE, properly understands the protocol of accreditation, so that ... towards accreditation, reaccreditation, yearly reports, external benchmarking – that actually becomes a separate unit ... with the sole responsibility of dealing with this area.”* (James)

If “accreditation speak” is a barrier, it means that there is a lack of clear guidelines, or the accreditation criteria are unclear, or in some cases, it might be that the institution itself does not know and understand the criteria to respond appropriately or adequately. Gail (PHEI5) finds the external quality assurance process “sometimes ... a little bit too oriented towards the public institutions, whereas private institutions might work quite differently and might call things by different names”.

Holly (PHEI4) makes the analogy that the external quality assurance process is “like doing an exam. Just answer the question properly”. This predicates that the question was understood. Holly indicates that understanding comes with experience, and:

*“... having a better team, a better, more qualified team, quite frankly, that we’ve got now. Most of us have done further studies, our own studies, in higher education in terms of Master’s. All of us. So, it’s understanding the relevance of the questions and what it is that we need to respond to and providing the right evidence.”*

The researcher would venture to add that the qualified team also needs sufficient experience in higher education – in the South African context, particularly, to address



the unique concerns. An added feature would be a strong research focus within the organisation that underpins the quality management processes.

PHEI6 contracted an external advisor (“consultant”) “to take a look at our submission and put it into the language of the HEQC” but found that this approach did not work since programme accreditation was not achieved. Consequently, the institution regards not having a dedicated quality assurance unit as a lack of capacity and structural constraint that it seeks to resolve. If the institution, which has been in existence for at least a decade, signals that it is not able to bridge the communication gap, it signifies that it either did not receive the necessary support at the time when risk initially manifested, or the support was not adequate. This should also be viewed in the context in which support was provided and the quality of the feedback. Support might have been specific and/or time-bound, or it could provide the appropriate tools for long-term self-sufficiency. Intervention strategies need to be opportune when addressing a specific challenge. Intervention or support strategies whereby resources are leveraged for systemic change might produce an equitable outcome (Shay, 2017). A strategy needs to be devised to address a wide range of developmental needs.

Holly (PHEI4) indicates that reflexive practice is key to realising weaknesses. The institution is aware that, during its last reaccreditation cycle, it did not substantiate all claims with (appropriate) evidence. “Whilst you might not always like what you hear,” the participant regards reaccreditation as a valuable experience.

Len (PHEI3) posits that:

*“There is too much room for interpretation when you read CHE evaluation reports. We very often have to go back and ask: ‘Please clarify this. What is meant by this? Is there a standard for this?’ In that sense, there would be great appreciation, and not just for myself but I think out of the larger industry if the criteria were more specific and there was maybe a sort of document that spoke around best ... around what standards could possibly look like in the various areas. We’ve come across so many situations where you put something down in response to a CHE query only to find out that you’ve missed the mark because you have not hit a particular standard, but that standard is not communicated or published anymore.”*

Whereas Len finds the feedback vague, David (PHE11) found the CHE's feedback at times detailed to the point of "over-regulation"<sup>177</sup>. These opposing views indicate that there should be consistency in the quality of the feedback provided.

The CHE will need to provide proper guidance to break down barriers when drafting the standards, criteria, and guidelines for the new QAF or the disconnection with the provider(s) will remain. It is reasonable to expect that institutions will take their circumstances into account, which might differ from other private provider contexts and public institutions. There must be in-principle decisions from the Accreditation Committee and HEQC in response to a diverse range of submissions on the accreditation criteria, and these need to be followed through consistently. The standard must be set as Len suggests, and the CHE intends to do this in the new QAF. Sketching different scenarios might be a useful addition to the guidelines. In addition, qualitative feedback from peer reviewers should be considered. Abby states that "We obviously say the CHE, but we realise it's the evaluator; it's not the CHE. The CHE take what they get back from the evaluators."

It is ultimately the CHE that takes responsibility for the evaluation process and the outcome thereof. There should thus be guidelines in place for evaluators so that the CHE's expectations are clear. The standards and criteria must be unpacked with evaluators for common understanding to be achieved.

Abby refers to staff attitude towards external quality assurance:

*"Everybody always sighs when there's reaccreditation or a campus visit coming up for whichever reason, relocation or whatever, but I think that's the only time when everybody really goes and sits down and think deeply and think what should we do differently."*

There is limited engagement around quality issues. This might present a barrier to quality enhancement.

### **6.3.2 Navigation of barriers or constraints**

The empirical evidence reveals that the institutions navigate barriers or constraints in various ways. In summary, the following findings are made:

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<sup>177</sup> See discussion in Chapter 5.

- a) Careful financial management, planning and budgeting which includes provision for contingencies.

Holly (PHEI4) indicates the present economic slump “*doesn't last forever, so you can't stop development. You've got to be ready, when the times get better, your programmes have got to be designed and ready to roll. This is a tough time at the moment but, fortunately, we've managed our finances well and we've got a cushion where we can manage to get through the difficulties*”.

- b) A risk-based approach to internal quality management and programme provisioning.
- c) Taking a proactive approach and positive view to the value-add of the programme reaccreditation process in terms of how structures, systems or processes could be enhanced in support of the core function, namely learning and teaching.
- d) Reflecting on the need for improvement in activities around research and community engagement.
- e) Leveraging a network of academics and industry and/or corporate partners.
- f) Implementing cost-cutting measures (to enable sustainability). For example, one multi-skilled librarian services two sites in close proximity.
- g) Staff are employed on fixed-term contracts if the workload does not necessitate full-time employment. This enables the deployment of human resources as and when required.
- h) Drawing from industry experts to provide specialist input in modules for a quality learning experience.
- i) Establishing industry partnerships for work-integrated learning and employability prospects.
- j) Drawing on academic expertise from the public sector to review the quality of programmes.
- k) Renewing contracts with part-time staff to ensure continuity in programme provisioning and less staff turnover.
- l) Responding to COVID-19 emergency regulations by providing learning and teaching and assessment (among other activities) online, or in blended learning format; apportioning less of the annual budget towards under-utilised infrastructure and facilities.

- m) Networking with national and international agencies or university networks for developmental purposes.
- n) Establishing dedicated positions and embedded roles in the organisational management structure to assist with internal quality management processes.
- o) Streamlining internal quality management systems for greater efficiency and effectiveness.
- p) Establishing (revised) reporting lines and approvals processes for internal quality management.
- q) Seeking to attend adequately, appropriately, and timeously to the concerns identified by the HEQC in the reasons for non-reaccreditation or conditions for reaccreditation.
- r) Liaising with regulatory body officials and seeking to establish open lines of communication.
- s) Reflexive practice that leads to improvement plans to enhance quality.
- t) Researching to enable internal quality enhancement.
- u) Seeking alternative measures, e.g. digital solutions, to internal quality management systems and processes.
- v) Investing in the necessary resources and infrastructure required for quality programme provision.
- w) Building a quality culture that will permeate the organisation and include all stakeholders and role-players.
- x) Being receptive to feedback from the Quality Council and following through for quality enhancement.
- y) Playing a reciprocal developmental role among private higher education institution peers.
- z) At least one person or entity is recognised in the institution that drives the quality agenda and takes quality assurance seriously:
  - “I don’t care if anyone likes me; I’m here to work, but quality assurance is the heart of the institution, otherwise we can close the doors.”* (PHE association participant)
- aa) Aiming for compliance, consistency, and standard practice:
  - “I’d rather do it the right way and not have sleepless nights.”* (PHE association participant)

bb) Despite the economic impact of COVID, the institutions retained staff – for stability and continuity and in the interest of the core business.

cc) Staff development opportunities are provided to build capacity.

Holly (PHEI4) indicates that in the specialist field that the institution operates, it is challenging to find suitably qualified and experienced staff; staff who are both subject matter experts, but also understand pedagogy; and with remote teaching under COVID-19, staff “who've got technological savvy, using an LMS, and teaching on an LMS”. The institution is doing staff training on technology and teaching technologies. It is also doing “a lot to get staff into postgraduate programmes now in teaching higher education, higher education studies, higher education technologies. Those are things that take a while”. The institution is addressing the systemic constraint; however, it is a process in itself: “The constraint is we've got this programme accredited, but it's going to take two years for that staff member to get their postgrad done or something like that”. The postgraduate studies are funded by the institution, which it recovers via the skills levy. If the staff are unwilling to upgrade their qualifications, “they can't teach on that programme anymore, simple as that”.

dd) The institutions leverage internal capacity and staff specialist knowledge to address the concerns raised by the HEQC.

ee) In general, the institutions plan, do, study, and act<sup>178</sup>.

ff) Following the requirements of the accreditation criteria.

gg) Associating with peers on different forums, such as USAf and private higher education associations, workshops, conferences and so forth for capacity building and an interactive learning experience.

hh) Doing surveys and tracer studies to gauge the quality of a programme.

ii) Concerning structural constraints unique to its context, PHEI2 has considered ways in which to meet the requirements:

*“It's purely what we do, and the context in which it happens is not always known to the evaluators ... I think that we just have to learn how to*

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<sup>178</sup> The PDSA Cycle (Plan-Do-Study-Act) is a systematic process for gaining valuable learning and knowledge for the continual improvement of a product, process, or service. Also known as the Deming Wheel, or Deming Cycle – it is an integrated learning–improvement model. (The W. Edwards Deming Institute, 2021)

*substantiate better what we do – more evidence, more wider thinking of the evidence. I believe that's the only thing.”*

Judging from above, the institutions that participated in this study are evidently trying to do what is required, and what is necessary, to meet quality standards, and attempt to enhance quality, despite the limitations imposed through constraints or barriers.

## **6.4 PHEI AS OPEN SYSTEM**

Consideration will be given to the institutions that participated in this study to determine whether they manifest as open systems in terms of the conceptual framework, namely the PHEI Open System Model. The empirical data will be considered in terms of the different elements or parts that constitute the PHEI Open System Model and in relation to programme reaccreditation.

### **6.4.1 External environment**

The external environment is the legislative and policy (regulatory), socio-economic, political, national (and regional and/or international) context within which the private higher education institution operates.

The data indicate that the institutions are aware of the legislation and policy frameworks around registration as a company, registration with the DHET and programme accreditation by the CHE. They are also aware and responsive to the requirements of the professional body, external stakeholders such as employers, and the needs of the industry when designing and reviewing its programmes. There is responsiveness to the DHET's requirements for registration, including submission of an audited annual report. The design and review of programmes are done following the criteria for programme accreditation. The institutions thus engage the relevant documents to achieve compliance. However, interpretation of the criteria for programme accreditation might differ based on: i) how the institution considers the criterion within its context; ii) how feedback from the CHE is received following the peer evaluation process; and iii) the “language of accreditation” which does not find common ground, in some cases, and is thus misinterpreted or misunderstood.

Despite the criticism levelled at the vagueness of feedback, or disagreement with feedback, provided by the CHE (in terms of conditions for reaccreditation or reasons for non-accreditation), each institution has processed the feedback through its

internal structures to either meet the stipulated condition or provide an argument in response to the reason for non-reaccreditation. In each case, the programmes that served for reaccreditation achieved a positive outcome.

To achieve programme reaccreditation, the institution followed the external process once the cycle had been initiated. The external quality assurance process comprised: i) training with the CHE regarding programme reaccreditation; ii) participating in the survey regarding its programme offerings; iii) completing the online application and providing relevant evidence; and iv) participating in the site visit verification process. To fulfil these requirements, the institution had to do internal processing through its structures and systems. This points to the absorption of information and utilisation of resources.

#### **6.4.2 Input**

The input is the absorption of information and resources from the environment that is required for the institution to function, including human, financial, and material resources. The empirical evidence indicates all the institutions have the required human resources in place, and where a need has been identified, the institution has commenced recruiting a suitably qualified person.

Despite the different organisational structures in place, the institutions are unified in the visibility of governance, leadership and management, and operational structures to support the core business, *viz.* learning and teaching. The institutions have adequate financial resources and appropriate physical resources in place to support and deliver their programmes. There are internal quality management structures and processes to quality assure the programmes, the design of new programmes or the review of existing programmes.

Learning management systems are in place to enable and support learning and teaching and assessment, and administrative and other support systems for operational purposes.

During the programme reaccreditation process, the institutions internalise the information received from the CHE and cascade it down through the various embedded roles and positions in the organisation, e.g. Academic Head, Registrar, Dean, Programme Coordinator, in the order determined by the process flow, for dissemination to responsible parties. The information is processed in terms of the



requirements of the reaccreditation process, including related requirements for a site visit, and the criteria for accreditation. The individuals are supported by relevant committees, such as an Accreditation Committee, or Faculty Board, or support (e.g. IT) and administrative structures. Working groups are established if required, e.g. PHEI3. The reports are processed via the internal quality management system through to the highest level of authority for approval before submission to the CHE. There are levels of accountability attached to each role in the system.

If there are reasons for non-accreditation or conditions for reaccreditation, or an improvement plan linked to notice of withdrawal of accreditation (as in the case of PHEI3 and PHEI6), the institution determines the responsible parties, and other resources required (such as finance to purchase library stock), to attend to the issues or areas of weakness as identified by the HEQC.

The information received from external academic peer reviewers and industry experts, student surveys, staff evaluation reports, climate surveys, alumni and employer feedback is channelled through the processes to effect improvement in the programme where necessary, either through reviewing it for relevance or in terms of delivery.

There is thus evidence of “throughput” of resources and information received from the external environment.

#### **6.4.3 Throughput**

Throughput is the conversion (using systems, processes, and procedures) of resources and feedback for learning and teaching, assessment, administration, daily operations and management, including quality management.

The institutions utilise their academic staff, albeit full-time or part-time, to deliver the accredited programmes and to reflect on the quality of the programme and its delivery. Through reflexive practice by the relevant individuals, through to the various internal quality management structures, the programme review will lead to improvement of the programme, if required within the set internal review cycle or flowing from the reaccreditation process. Improvement is made either to achieve compliance quality (e.g. in terms of conditions) or actual quality visible through self-directed changes made over time, for instance, to the programme itself (e.g. updating content), or throughput on the programme (i.e. student performance),

support needed for the programme (e.g. an electronic library to supplement and/or complement the prescribed reading materials such as textbooks, or “state-of-the-art” facilities for delivery of the programme) or employ dedicated personnel for improved management of programme quality.

The internal environment consists of government, leadership and management structures, and academic, support and administrative staff to serve on the relevant internal quality management structures and participate in the related processes to ensure throughput.

#### **6.4.4 Internal environment**

The internal environment would be the governance, management, operations, internal interactions, and dynamics. It was found that internal and external environments can intersect. The internal environment of each institution is in a developmental phase whereby changes to structures and staffing, for instance, are planned (e.g. PHEI1 and PHEI6) or have already been made, for example at PHEI3 where the Dean of programme design was appointed to assist with achieving programme reaccreditation for those that had been placed on improvement plans. It is indicated that these changes have been in response to feedback received from the CHE.

James (PHEI6) indicates that every higher education institution should be reflective and seek improvement:

*“We are a young institution, and we are also a growing and learning institution, and I think every institution of higher learning is always a learning institution. We always should learn ... We should always question ourselves and question the law and is what we are doing still good enough or not.”*

This is indicative of an institution that is open to change, open to positive and constructive influence emanating from the internal and external environment. The converse would be stagnation and lack of growth and development.

There is internal interaction between staff during the throughput phase, for example, the Dean will liaise with faculty (PHEI1) or the Head of Academic Quality Assurance (PHEI5) will liaise with the Registrar for data on student enrolment to complete reports that need to be submitted for the application for programme reaccreditation.

There is internal interaction between staff and students through student surveys and feedback to students on these.

Several staff members have to fulfil more than one role, which is a result of the integrated operations management and quality management functions, for example, at PHEI5 where the Head of Academics is also Head of Academic Quality Assurance or PHEI1 where the Registrar is also responsible for internal quality assurance. In the case of PHEI5, despite having fewer programmes, they are spread across multiple sites which makes it “bigger” thus “the longer is the way of communication”<sup>179</sup>. There has to be a liaison with each campus to obtain the data required for reaccreditation purposes. The reflexive practice has brought these embedded roles into relief through creating teams or committees or establishing new roles to support the function.

Several of the institutions have national and/or international partnerships or networks with international bodies (e.g. PHEI6) to seek solutions for effective quality management and compliance with requirements of the HEQC. For example, drawing on a network of industry experts or academic peers to do an external review of the programme.

There is liaison with different external parties, such as alumni, or employers to canvass opinion on the “quality” of the graduate, which in turn reflects on the quality of the programme to deliver on the graduate attributes required for employment in a particular industry or profession. There is liaison with external peer academics through contracting them as external moderators of assessment. PHEI7 demonstrates external liaison with practitioners in the community to complement curriculum delivery through visiting sessions or deliver part of the curriculum which requires specialist input. There is engagement with statutory and non-statutory professional bodies, as in the case of PHEI4, PHEI5 and PHEI7, to ensure that the requirements of the professional body are taken into consideration in the design and review of the programme, retain professional body approval and thereby ensure that graduates from a programme are eligible to register on professional designations.

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<sup>179</sup> Von Bertalanffy (1968)

Feedback is generated back into internal review processes to close the feedback loop, although this aspect requires attention in some areas, as acknowledged by PHEI5. It appears that, in the case of the latter where part ownership of the reaccreditation process is taken by staff, or in a case where the process is not integrated with the overall internal quality management of all programmes and the reaccreditation process is treated instead as a “project” that has a deadline to meet, that the feedback loop might not be closed. Once the project is done, the staff return to their normal routine, which could be – in the case of some part-time staff – to teach and go. The heavy reliance on part-time staff could pose a challenge in terms of availability during constrained timeframes for the internal process. If the quality assurance commitment is not written into an employment contract, there is no recourse for the institution to insist on any contribution whether in the form of programme design or review.

Feedback could also consist of regular engagement with the external environment in the form of engagement with personnel from the CHE, DHET and/or SAQA to achieve compliance and receive the necessary guidance in the reaccreditation process.

Despite the seven institutions having different internal quality management systems in place – at varying stages of development – they have all achieved a positive outcome to the previous programme reaccreditation process. In the case of PHEI3 and PHEI6, the process was successfully concluded following an improvement plan. In terms of improvement plans, the relevant institutions had to engage in continuous communication in terms of follow-up and trying to understand the “accreditation language”, to achieve conclusion of the process. The closure of the feedback loop between the CHE and the institution results in the conclusion of the reaccreditation process, which in turn results in the closure of the DHET-CHE feedback loop when registration is finalised.

It is thus evident that feedback from the external environment impacts the dynamics of the institution. For instance, if programme reaccreditation is not achieved, the programme is placed on teach-out and there is a resultant loss in new student enrolment, affecting income generation and related budgeting for staffing, resources, etc. If programmes have to undergo reaccreditation-related proceedings, such as

representation, deferral or conditions, the workload of certain role-players is increased through continued participation in the process, and this could be increased two-fold if a dual role is played.

The relationship between the institution and the external party, such as the CHE, could become constrained if there is frustration with delays in the process or lack of, or unclear, communication. There appears to be increased activity in the institutions in preparation for institutional audits and the QAF. The institutions will rely on the guidance of the CHE (as indicated by David that PHEI wants to “grow with the CHE”), through guidelines, manuals, workshops, webinars, and so forth, for capacity building and development. For example, as explicated by Holly, where the PHEI4 quality assurance team is a dynamic group that immediately channels feedback from such a forum into the internal environment.

A further illustration of a dynamic internal environment is the revision of processes and roles in internal quality management. Although there are functional systems in place to achieve programme reaccreditation, the data reveal that these systems are in a state of flux due to planned changes linked to lack of capacity. The fact that the systems show evolution reinforces the idea of an open system that is receptive to developments in the sector. The new QAF and institutional audits, which expect internal quality management systems to be in place, serve as disruption of the status quo and thus the impetus for renewal. There is a drive towards building a quality culture that will permeate the internal environment by drawing in more role-players to provide input in processes. Roles and responsibilities are defined with a commensurate level of accountability. By drawing quality assurance into all processes, it is integrated into the fabric of the organisation and everything that it does, not something that runs parallel and is focused on as a separate project.

Lizel posits that quality assurance is about everything that you do:

*“It becomes your DNA. It’s not something that needs to be done. It’s who you are.”*

Thus, “management for quality”. There is a division of labour in terms of staff capacity and capability including lecturing staff. A PHE association participant indicates that structural changes at the member institution have precipitated greater involvement from faculty:

*“I normally do the work and now (**the Deans and faculty**) have to do it themselves. I think it’s an eye-opener... they all have their portion. Institutional is mostly with me, but for the academic side – the reviews, risk letters, programme outcomes – that’s their responsibility.”*

Participation is thus embedded in the structures and responsibilities delegated by leadership and management, as in PHE11-7, but the realisation of the value of participation could lead to stakeholder commitment to the quality assurance process and building of a quality culture<sup>180</sup>.

The empirical evidence indicates that the institutions are open systems. As institutions that demonstrate compliance with registration and quality assurance requirements through programme reaccreditation, they are receptive and responsive to the external regulatory environment. Their internal environments are evident of adaptive, reflexive, progressive and transformative processes within a functional internal quality management system.

## **6.5 CONCLUSION**

This chapter provides insight into the internal quality management structures and processes employed by seven private higher education institutions that participated in this study. The empirical data establish that there are internal quality management systems in place in these private higher education institutions. The empirical evidence also indicates each institution’s quality management structure is unique to the organisational structure. This aligns with the finding by Westerheijden *et al.* (eds., 2007) that there are different quality management systems in place in higher education institutions. The findings provide some clarity on the extent that private higher education institutions accept responsibility for their quality assurance processes and how they manage these internally. They also provide clarity on the quality management processes that are in place to facilitate the achievement of compliance with the criteria for programme accreditation<sup>181</sup>. Thus, the “presence of

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<sup>180</sup> The CHE (2021b, p.8) as follows: “Quality culture refers to a set of interrelated and enacted assumptions, values, attitudes, activities and behaviours, shared by most academic and support employees at an institution that, together, function to deliver the desired quality of learning and teaching, research and community engagement determined by the vision, mission and strategic goals of that institution.”

<sup>181</sup> See questions raised in chapter 1.

institutional level QA” is clearer (cf. Hoosen et al, 2017, p.11), albeit found in a selected sample of institutions within the scope and limitations of this study.

It is also evident that certain managerial and/or administrative positions overlap, for instance, the Registrar also plays a leadership role in quality management. Staff generally fulfil more than one role but, in some cases, there are (planned) standalone quality management positions or units to complement or revitalise existing functions. Senior Management oversees the internal quality management process and cascades “quality work” down to other staff members through the organisational structures.

The study finds that the participant institutions use two approaches to quality assurance regarding programme reaccreditation, namely: i) the reputational approach – which uses a peer review system to evaluate (and sometimes rate) the quality of the programme, and ii) student outcome approach – which is based on the measurement of outcome indicators such as student achievement, careers, earnings, etc. (Stensaker (in Westerheijden *et al.*, 2007, p.99-118)).

A limited number of participants from each institution agreed to participate in this study. All the participants serve on senior management structures of the respective institutions. Notably, lecturers did not volunteer to participate. This is a limitation of this study since insight into the experience of all “quality workers” in the internal quality management process would add value.

It is noted that the composition of the internal quality management structures has changed over time and is still in a process of change as these institutions respond to the expectations set by the QAF. Internal restructuring is being done to establish more sophisticated systems to manage internal quality. Different levels of responsibility and accountability are built into the revised structures. It is further noted that the suite of programme offerings has expanded, or growth is in the offing. The empirical evidence reveals the participant institutions as stable environments, with a minimum of ten years in existence in the sector, and a commitment to quality higher education. They are at different stages of “maturity”/“functionality” (as per the QAF) in their internal quality management systems. They are aware of their strengths and weaknesses and have taken the new QAF, and introduction of institutional audits, as an opportunity to reflect, review and revise to eliminate any



possible threat of not achieving compliance with external quality assurance measures.

## CHAPTER 7

### RECOMMENDATIONS AND CONCLUSION

#### 7.1 INTRODUCTION

This chapter considers the findings of the study in relation to the research questions to determine whether these can be answered.

#### 7.2 SECONDARY/SUB-RESEARCH QUESTIONS

##### ***1. How does the PHEI channel information and utilise resources internally to achieve reaccreditation of a higher education programme?***

The findings indicate that the private higher education institution utilises a quality management system to manage internal quality assurance. As an open system in terms of the PHEI Open System Model, the institution has a permeable boundary that allows the input of information from the external environment. This information could be received from the external regulatory environment, the Quality Council, or stakeholders such as professional bodies. The boundary also permits the input of resources from the external to the internal environment. These resources are primarily financial resources (received mainly through student fees) and human resources (the recruitment of suitably qualified and experienced staff).

The information is channelled in the throughput process, which is the conversion of available resources into relevant structures, which is in the form of embedded functions or roles, small groups with a specific focus, committees, and boards and governance structures (for internal approvals). In the throughput process, the data gathered from relevant stakeholders in the internal environment (*viz.* students, staff, leadership and management), as well as the data gathered from external stakeholders (such as external moderators, external academic peer reviewers and industry experts), are channelled through the structures (comprised of embedded role-players and functionaries) which are integrated and interdependent.

There is thus the interaction between the internal and external environment and focused, dedicated activity in the throughput process through the conversion of resources to achieve the output, which is the reaccredited programme.

## ***2. How does the PHEI navigate possible constraints or barriers to achieve the reaccreditation of a programme?***

As an open system, the private higher education institution is open and receptive to the external environment. It engages with relevant parties in the regulatory framework to seek solutions and the means to effect improvement to achieve compliance and enhance quality. The institution is forward-thinking, proactive and employs a risk-based management approach. The institution plans for contingencies and does reflexive practice. It leverages a network of peer academics and industry experts and engages and collaborates with national and international agents.

The institution ensures the employment of an academic, support and administrative staff complement required for daily operations and quality management of its programmes. It embeds functions and roles in the organisational structure for governance, leadership, and management, and for the “quality work” (in the “throughput” process) that is required in maintaining quality higher education programmes. Staff development opportunities are provided. The institution leverages staff expertise to attend to the constraints and/or weaknesses in the programme (or supporting mechanisms) identified by the Quality Council, thus information from the external environment that is processed in the internal environment through the conversion of resources. The institution strives to establish a quality culture that involves the commitment of all internal stakeholders to the quality agenda.

## ***3. Which quality management practices are implemented within the PHEI to enable compliance and facilitate quality enhancement?***

The institution adopts a Systems Approach to quality management. It ensures that there are structures, processes, and procedures in place, underpinned by policy, to enable quality management of the programme. It employs internal and external moderation practices, internal and external peer review, monitoring and evaluation, quality checks and approvals processes (which form part of the “throughput” process).

Staff roles and positions within the quality management system are linked to levels of responsibility and accountability and a line management function. Leadership and senior management structures provide strategic direction. There is a top-down and

bottom-up approach to quality management with intersecting nodes in the quality management value chain.

### **7.3 PRIMARY/MAIN RESEARCH QUESTION**

How do private higher education institutions manage internal quality assurance to achieve programme reaccreditation?

The institution establishes the relevant internal structures required for governance, leadership and management, and operations. It also establishes structures necessary to ensure compliance with the requirements of the DHET, SAQA and the CHE, which are integrated functions of the organisational structure. It ensures that it has the required financial, physical and human resources for operational purposes and in support of the core business, which is predominantly learning and teaching, and assessment. It provides access for staff and students to these resources.

As an open system, the institution absorbs and processes information (which can be in the form of legislation, policy, feedback from stakeholders, etc.) through its relevant structures. It engages critically with the information and strives to respond appropriately, adequately and with sufficient evidence to the requirements as stipulated. It engages critically with the criteria for programme accreditation to reach an understanding of the minimum standards, and how these can be interpreted for the institutional context to demonstrate adherence.

There is evidence of leadership and management as the driving force behind managing quality. Strong leadership and management are displayed at various levels of the organisation that has a unified purpose not to merely achieve compliance, but to also effect improvement. Thus the quality agenda is not compliance-driven quality, but substantive, actual quality that is visible in different areas that support the programme (for example learning and teaching technologies) or in the programme itself whereby the review process has necessitated the need to revitalise the curriculum.

There are strong links with external specialists and professionals to review the quality of the programme at regular intervals, following which the feedback is fed into the internal environment for conversion into an improved product.

There is the realisation that “quality work” cannot be done in silos and that interdependencies need to be leveraged to eliminate duplication and repetition and allow for synergy in the quality assurance process. The institution takes stock of its internal capacity and designs a strategy to supplement, complement, or build capacity for greater efficiency. It examines its existing structures to determine whether restructuring or redeployment of resources is required to better support the quality management of its programmes. It recognises the integral and invaluable role of staff in supporting the initiatives. The institution strives for uniform and consistent practice across all areas, and stability. The programme reaccreditation process is a natural outflow of regular activity that fits within the overall quality assurance process, not a standalone process delineated by external initiation.

It is evident from the findings that there are different internal quality management systems in place within the private higher education institutions that participated in the study. Although differently constituted and some systems more complex or expansive than others, the systems all exhibit receptiveness to the external environment which is critical for an open system. There is flow of information (and feedback) to and from the internal and external environment, and within the internal environment. The empirical evidence reveals that programme reaccreditation is managed within an integrated, collaborative process, albeit on a large or small scale depending on the size of the organisation. Institutions experience barriers or structural and/or systemic constraints which they attempt to navigate to achieve compliance quality, at a minimum. The internal quality management of programme reaccreditation or quality assurance in general, within the organisation is resource-intensive and requires the conversion of resources, a strategy, systematic application, dedicated focus, and regular throughput for the achievement of quality output.

The definition of quality is contextual, and the quality of a programme within the limited scope of this study lies in compliance, consistency, and fitness for purpose. Thus the quality management of a quality programme, means the conversion of human resources to critically engage with and understand the programme accreditation criteria, evaluate the efficacy of the programme to determine how well it achieves its stated aims, and absorb the feedback from specialists in the field and

the peer-review process into improvement plans for the maintenance, and possible enhancement, of programme quality.

## 7.4 RECOMMENDATIONS

It is recommended that the following actions be considered.

### 7.4.1 Recommendations to private higher education institutions

- Adopt a Systems Approach suitable for the organisational structure and strive to be an open system. Alternative quality management systems<sup>182</sup> could be explored with a view to either complement, change, or challenge existing systems. If there is any complacency or stagnation in the system, where closed systems are detected, this should be disrupted for the sake of quality enhancement in the sector. “Systems thinking is ‘contextual thinking’. Things should be explained in terms of their context, which means explaining them in terms of their environment” (Brits, 2011).
- Define and establish brand identity and build it into all structures, processes, and systems in a holistic manner as part of the organisational ethos.
- Revisit the institutional vision and mission and systems, policies, processes, and procedures to ensure that any changes align to ensure fitness of purpose and fitness for purpose of the institution and/or programme.
- Be consistent in the application of policy.
- Establish an internal quality management system and review the existing quality assurance structures and processes to determine the state of readiness for institutional audits and implementation of the QAF, and sustainable internal quality management, and do restructuring, if necessary, to embed positions and roles in the structures to ensure ongoing support, quality management, and direction to the quality assurance processes.
- Consider “action research” on the evolution of the internal quality management system. Do a climate survey on the impact. “Document the structures, responsibilities and procedures required for effective quality management” (Kriehbel & Miller, 2018).
- Internal quality assurance should mirror external quality assurance to find alignment, and synergy for efficiency and effectiveness. Sufficient and relevant

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<sup>182</sup> E.g. ISO 21001:2018 (Gilbert, 2020)

resources, and infrastructure, should be available to attend to internal quality assurance processes<sup>183</sup>.

- Utilise external peer reviews as part of the internal quality assurance process.
- Adopt a reflective and generative methodology to reflect on the institutional status quo, and to develop frameworks, manuals, and guidelines for internal “quality work” processes. This approach will enable innovative and creative thinking around how to navigate barriers or constraints for the institution (and its programmes) to remain relevant and responsive.
- An audit of internal capacity and capabilities should be done to ensure that human resource potential is realised and effectively utilised. “Quality work” teams should harness strengths and leverage staff capability and agency.
- Rotate roles for capacity development. Do succession planning and implement a talent management strategy.
- Engage critically with the Framework and Manual for institutional audits, and the QAF, as well as the relevant standards, criteria, and guidelines, to deconstruct “external quality assurance language” and reconstruct meaning for the institutional context. The criteria should not be seen as standalone requirements but viewed holistically in terms of quality provisioning in all areas to support the programme.

*“You can’t quality control what you don’t know, and you can’t do if you don’t know the quality criteria.” (Abby)*

- The institution should be realistic in its ability and capacity to deliver a range of programmes across different fields or different qualification types, particularly at postgraduate level, or across various sites of provision as it would need to ensure and assure, on an ongoing basis, the quality of these programmes and manage the quality thereof through the deployment of resources. There would need to be a demonstration of a quality programme in terms of compliance, consistency, and fitness for purpose. A risk-management approach should be adopted.

*“It’s easy to say that we want to have 10 000 students, but can we support 10 000 students? That’s the first question. Can we offer quality education to 10*

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<sup>183</sup> Stander and Herman (2017) indicate that “There seems to be a link between the diversity of the various PHEIs and their ability to manage the QA processes. This is usually influenced by the availability of relevant and sufficient resources. Furthermore, the study also revealed that size and infrastructure did have an impact on institutions’ ability or inability to keep up with the demands of both HE and QA legislative frameworks.”



*000 students with what we've got? You've got to expand your support mechanisms and things like that ... When you change from a face-to-face model to full distance education. That's a different cup of tea because do you have the IT infrastructure to support?" (Stanley)*

- Invest in the appointment and retention of suitably qualified and experienced staff in recognition of the fact that they are integral to learning and teaching, assessment and moderation, student support, internal quality management and quality assurance of the programme in its design, delivery, and review; and with a view that the investment will reap dividends over time in the maintenance of quality registered programmes and qualifications.
- The institution should invest in the capacity building of staff through formal qualifications to systematically build research capacity within the organisation.
- In the case of a revolving part-time staff complement, "quality work" commitments should be written into employment contracts, and these responsibilities need to be clearly defined.
- The staffing model should be underpinned by the pedagogical philosophy.
- The availability and quality of resources, infrastructure, and facilities, including learning and teaching technologies, should provide an equitable, quality learning experience across sites and programmes.
- A new provider entering the sector should ensure that – at a minimum – governance, leadership, and top-level management structures are in place with responsibility and accountability devolved to different individuals to provide strategic direction, and foundation to support the core business. There should be a basic leadership and management structure, and core full-time staff, in place with clearly defined roles and responsibilities for quality management of the programme and to provide academic leadership and stability, and to be involved in programme design, delivery and review, and monitoring and evaluation.

*"I think trying to put certain things into place, you know, make sure that you don't decide to start a private higher institution because there's money and it's a money-spinner. Try to just get things in place. I think you have to go and look at the system to tell you what is needed, and you need to bring all of that together." (David, PHE11).*

- Build quality into the product at the outset.

- Explore credible articulation pathways through appropriate benchmarking and partnerships.
- Pilot a partnership and action research the efficacy thereof. At the very least, the hosting of quality assurance management teams could be done by individual private-to-private or private-to-public institutions as a learning exercise (a “staff exchange” programme of sorts), not necessarily in the same field if there is a perceived risk of competition.

*“We are in business so we've got a dual role, and that is, I think one of our biggest problems also, is the fact that we cannot really benchmark with other private institutions.” (Abby)*

- Students need to be empowered within the quality assurance framework and play a more active role to understand the benefits in the value chain, e.g. employability, mobility, and portability of qualifications both nationally, regionally and internationally, etc.
- Conduct a study on the alignment of internal quality assurance with external quality assurance processes.
- Conduct a study on the impact of external quality assurance.
- Ensure that the internal quality management system encompasses all requirements as defined by the QAF<sup>184</sup>.
- Use the institutional audit process as benchmarking exercise for the QAF.
- “Live quality”.

#### **7.4.2 Recommendations to policymakers and regulators**

- Strive to be an open system.
- Review policy, regulations, frameworks, manuals, standards, criteria, and guidelines at regular intervals in response to the changing environment and evolving higher education sector and to achieve synchronicity and alignment.
- Be consistent in the application of policy.

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<sup>184</sup> “A quality management system refers to the institutional arrangements for assuring, supporting, developing and enhancing, as well as monitoring the quality of learning and teaching, assessment, research, and community engagement.” (CHE, 2021a, p.22)

- Review the regulations and/or guidelines for registration to indicate the minimum requirements for governance, leadership and management structures, and internal quality management systems.
- Review the regulations for registration and/or the guidelines regarding structural (material) matters to complement/align with external quality assurance activity, e.g. in the case of change of legal name or change of company, or new site and new programme feasibility.
- Document all strategies, processes, procedures, and developmental initiatives as the sector moves towards implementation of the new QAF, and beyond. Continue to keep the sector updated at regular intervals on a digital platform accessible to all.
- Break down systemic barriers through exploring efficiencies, providing clear guidelines and timeframes, and establishing a communication strategy.
- There should be attention to the terminology used in the sector – correct terminology to inform stakeholders accurately. The quality assurance language, albeit “accreditation speak”, “audit speak”, “national review speak”, should be clear – stakeholders should not be marginalised through jargon and parameters must be clear.
- Use inclusive, constructivist and positive approaches to draw in all stakeholders.  
*“Sometimes I’m overly sensitive but, when at every training session, somebody goes ‘there are those bad apples in the private institutions’, every single time. Surely there’s some bad apples in the public institutions too?”*  
(PHE association participant)
- Consistently employ reflexive practice and the generative methodology.  
*“It’s then fair for everyone to take a hard look at themselves, including the CHE, the DHET, everybody. We cannot have these same issues going round and round, year after year, and nobody’s addressing them.”* (PHE association participant)
- Do an internal capacity audit and invest in capacity building through formal qualifications for retention and upskilling of staff.
- Draw staff (from across functions) onto research projects to build internal research capacity.

- Provide an opportunity for sabbatical and staff exchange programmes to enhance the knowledge and skills in the field of quality assurance.
- Systematise accreditation and registration processes for seamless flow and streamlining and instant access to outcomes upon the conclusion of the process.
- Be transparent<sup>185</sup> about the quality of programmes and qualifications on the HEQSF.
- Ensure that the information on qualifications on the HEQSF is accurate to adequately inform stakeholders of the graduate attributes that need to be achieved.
- Collaborate formally and leverage interdependencies.
- Consider “PQM”/”Registration” clearance for private higher institutions based on documentation provided for registration and amendment of registration. Provide the clearance certificate upon application for accreditation.
- Produce the standard for internal quality management.
- Produce the criteria for a functional quality management system.
- Explore which enterprise architecture framework is most suitable to an organisation that is evolving within the context of an external environment and an internal environment that is changing.
- Research should underpin decision-making.
- When handing over the baton to institutional audits, reflexive practice should be done on the outgoing reaccreditation process, including analysis of the reasons for withdrawal of accreditation and conditions for reaccreditation to compile a compliance risk register for the private higher education sector but also to inform the CHE of where “over-regulation” (cf. David and James’ accounts) could present a barrier to compliance. “Pockets of excellence” could be identified for the opportunity to showcase success.
- Produce reports on the quality of programmes and qualifications in the sector after every external quality assurance cycle.
- Distil data from audit reports and use the data to inform capacity building and quality promotion workshops.

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<sup>185</sup> (cf. <https://accreditation.yale.edu/>. Following a reaccreditation cycle, Yale published its *2019 Self-study*, the *Evaluation Team Report*, *Yale’s response to the Evaluation Team Report*, and the *NECHE 2019 Reaccreditation Letter* – public disclosure; the student has information at his/her disposal to make an informed choice about place of study). Thus, institutions should be required to make visible the outcome of an EQA process.

- Do internal and external peer review of an external quality assurance cycle, e.g. an audit cycle.
- Within the differentiated approach, consider a mid-term review (for developmental purposes) within quality review cycles (QAF) until the institution can self-regulate and achieve functional literacy of the standards and criteria. Thus gradual release from dependence on external intervention to ownership of internal quality assurance.
- Consider whether certain Faculties or Departments of the Institution could self-accredit programmes (in terms of “pockets of excellence” or functional internal quality management systems). Consider leveraging on the Memorandum of Agreement with professional bodies in terms of Faculty or Department or School self-accreditation for a professional programme.
- Consider a “Material Change” policy whereby institutions have the responsibility to inform all the regulatory authorities (at the same time) of any material changes within the institution that could affect its ability to adhere to the threshold standards. Material changes could include “changes that may significantly impact governance and status, such as changes to ownership or major shareholdings or changes of Chief Executive Officer, Principal Executive Officer or principal academic leader” and “changes that may impact on financial viability, such as significant changes to the provider’s existing, new or anticipated revenue sources or the appointment of an external administrator, liquidator or receiver”<sup>186</sup>.
- In terms of withdrawal of accreditation and deregistration: The process must be clear and transparent and the basis on which accreditation may be withdrawn should be outlined.

*“I’ve got a representation, but I’m now challenging the people that did not accredit me. I’m challenging their decision.” (Stanley)*

- Institutions should not only respond to external quality assurance in the affirmative but also demonstrate the transformative aspects of their initiatives (i.e. compliance and quality enhancement).
- Close the feedback loop with all stakeholders.
- Demarcate programme-specific or qualification-specific accreditation criteria from institutional accreditation criteria.

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<sup>186</sup> (Tertiary Education Quality and Standards Agency (TEQSA), 2021)

- There should be clear guidelines, and a Code of Conduct, in place for peer reviewers/communities of practice regarding the CHE's expectations. The standards and criteria, and scope of work, must be unpacked for common understanding to be achieved.
- Attract highly qualified and experienced academics in each subject field from both public and private institutions for the communities of practice.
- Survey institutions about their COVID recovery plans and progress on implementation.
- Do a comparative study of the functional internal quality management systems and/or quality assurance processes of a private higher education institution and public university concerning, for example, improved quality of learning and teaching that can lead to transformation in the sector. This would seek to link the sub-sectors to the broader transformation imperatives of the sector as a whole.
- Do further study on internal quality management systems in the South African higher education context. The institutional audit findings would add to the body of knowledge in this regard.
- It should be decided how the institutional audit reaccreditation outcome (with the institution as the unit of analysis) will link with the existing *Framework for Programme Accreditation* (2004a, p.9) that states, "Only those programmes which satisfy at least minimum quality requirements will be allowed to enter and remain in the higher education system". Furthermore, the HEQC's "recommendation" to the DHET to "reregister" (amend registration) should be carefully considered as that deliberation and decision lies with the DHET that also takes other factors or requirements into consideration. The recommendation should align with the CHE's mandated function. The audit panel should recommend an outcome to the HEQC, i.e. programme reaccreditation/confirmation of accreditation<sup>187</sup>.
- Conduct impact studies on external quality assurance.
- There should be serious consideration of the potential of the private higher education sector to play a role in transformation – alongside public institutions.
- Live "quality" as defined in the new QAF.

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<sup>187</sup> The HEQC could consider communicating the outcome as a list of programmes per institution for the DHET Registrar to decide on.

## 7.5 CONCLUSION

The QAF (2021) aims to enhance the three core functions of institutions, i.e. learning and teaching, research, and community engagement, and indirectly the student's educational experience. To this end, the CHE is redefining its collegial, developmental, quality enhancement-driven approach in the endeavour to strike a balance between accountability and quality enhancement (CHE, 2021a, p.24, 30 and 57; 2021b, p.3). The idea is to move institutions beyond the threshold of quality compliance to a quality culture that permeates the organisation through strengthening internal quality management systems. How this would be achieved from an external quality assurance perspective, via implementation of the QAF, has to be carefully considered in the planning phase and would require the input and participation of all stakeholders, most importantly the higher education institutions that need to accept responsibility and accountability for establishing and managing internal quality assurance systems. Brennan (2018) indicates that "quality management arrangements are established to ensure that quality intentions are achieved". If the latter materializes, that in itself will alleviate the need to "police" a vast, complex sector because it has boiled down to a matter of policing if one considers unscrupulous activity in the sector. There needs to be collaboration and synchronicity in the application of internal and external quality assurance.

The QAF objectives are laudable but ambitious and it remains to be seen whether the CHE can stay the course in its developmental approach that seeks to capacitate and guide institutions towards quality compliance and enhancement, and, to some extent, self-regulation. Brennan (2018) raises the question whether internal quality assurance is a "mechanism for the implementation of state policies and the national quality management machinery" or if it could be viewed as a "mechanism for maintaining and possibly enhancing the autonomy of higher education institutions and using it to drive institutional change and development in different and changing contexts". If the latter, embracing internal quality assurance and establishing or fortifying internal quality management systems could lead to sustainable institutions that display as adaptive, agile open systems.



Systems need to be reviewed and measures put in place to manage implementation of the new QAF effectively. Stander and Herman (2017) indicate that there is a link between the diverse nature of the institutions and their ability to manage quality assurance. Thus, this diversity needs to be considered by the CHE upon implementation of the QAF, particularly in terms of whether “relevant and sufficient resources”<sup>188</sup> are available for effective and functional internal quality management systems.

This study is not an exploration of the programme accreditation criteria *per se* in terms of how these link to programme reaccreditation. However, touchpoints have been referenced.

The study is limited in scope and size and, therefore, the findings cannot summarily be generalised. The internal quality management systems cannot merely be transplanted onto other contexts. Internal quality management systems need to be evaluated in terms of the size and infrastructure of the institution as these have “an impact on institutions’ ability or inability to keep up with the demands of both HE and QA legislative frameworks” (Stander & Herman, 2017).

The study is distinct in adding to the body of knowledge and creating new knowledge around internal and external quality assurance in the form of programme (re)accreditation in the private higher education context. It adds to the body of knowledge around internal quality management at private higher education institutions and how these institutions display as open systems as viewed through the PHEI Open System Model conceptual framework lens. It is recognised that further study is needed, particularly with the advent of institutional audits and the QAF.

The institutional audits and/or institutional and qualification quality reviews (to be undertaken under the QAF) should utilise a Systems Approach and apply the PHEI Open System Model lens to determine whether internal quality assurance systems are functional to manage qualification and programme development, review and improvement. This would aid the peer reviewers in determining whether a robust, credible, systematic process from input to throughput has been followed to achieve

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<sup>188</sup> Stander and Herman (2017)

the output. Under the QAF, “output” would mean that “confirmation of accreditation” (to replace the term “reaccreditation”) of a programme has been achieved. The Open System lens would need to be applied dual-fold, i.e. to determine whether a quality qualification has been produced as well as quality programme(s) that lead to that qualification.

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## Appendix A: Letters of invitation (templates)

... 2020



UNIVERSITEIT VAN PRETORIA  
UNIVERSITY OF PRETORIA  
YUNIBESITHI YA PRETORIA  
Faculty of Education

Prof/Dr/Mr/Ms...

Director...

South African Qualifications Authority

SAQA House

1067 Arcadia Street

Hatfield

**PRETORIA**

0083

Email address:

Dear ...

### Invitation to interview: participant's consent

I am currently registered as a student at the University of Pretoria. I hereby request permission to conduct an interview with you and relevant staff in the Directorate for the data collection component of my research study. I have received permission from the Acting Chief Executive Officer of SAQA to conduct these interviews. The study comprises semi-structured interviews with SAQA staff involved in the registration of qualifications, particularly those recommended by the Council on Higher Education following its reaccreditation process. A purposive sample of minimum two participants is required. Attached, please find the research proposal for this study that should be taken into consideration.

**I hereby declare that no conflict of interest exists.** Although I am currently in the employ of the CHE, my employer has no vested interest in my study, which is self-funded. I was previously employed by SAQA (employment ended 31 October 2018) and SAQA also holds no financial or other interest in my study. I have received approval for the study from the Ethics Committee of the Faculty of Education. The

study will not infringe or impinge on the work of any staff member at the organisation who might currently be engaged in research of a similar nature. I am cognisant of UP's plagiarism policy and hereby declare that this is my own work. The study is the intellectual property of UP.

I hereby provide assurance that the participants' information and data collected during interview will be kept confidential and safe at all times. The anonymity of respondents will be protected throughout the process. Your participation will be entirely voluntary. You will need to provide written consent to participate in the study. An interview schedule will be made available ahead of time. Interviews will be conducted at the participants' convenience (on a virtual platform). Social distancing measures will be observed under the COVID-19 Disaster Management health and safety protocol. I hereby declare that I will respect the research site and participants, and conduct myself professionally at all times.

The findings of this study will be included in the thesis in partial fulfilment for the degree, Doctor of Philosophy (Education Management, Law and Policy); published in a peer-reviewed journal if recommended by my supervisors; and/or presented at a conference if recommended by my supervisors.

If this request meets your approval, it would be appreciated if you could contact me at the email address below to set up an appointment.

Yours sincerely

Zahida Myburgh (Mrs)

Contact details: 072 247 1597/ [zahida.myburgh@gmail.com](mailto:zahida.myburgh@gmail.com)

Supervisor: Dr T. Calitz  
Faculty of Education  
[talita.calitz@up.ac.za](mailto:talita.calitz@up.ac.za)

Ph: 012 420 5624

Co-Supervisor: Dr Kolawole Adeyemo  
Faculty of Education  
[samuel.adeyemo@up.ac.za](mailto:samuel.adeyemo@up.ac.za)



UNIVERSITEIT VAN PRETORIA  
UNIVERSITY OF PRETORIA  
YUNIBESITHI YA PRETORIA  

---

Faculty of Education

... 2020

Prof/Dr/...

Director...

Council on Higher

Education

1 Quintin Brand Street

Persequor Technopark

Brummeria

0020

Email address:

Dear ...

### **REQUEST PERMISSION TO CONDUCT RESEARCH**

I am currently registered as a student at the University of Pretoria. I hereby request permission to conduct interviews at the Council on Higher Education for the data collection component of my research study. The study comprises semi-structured interviews with CHE staff involved in the process of programme reaccreditation. Members of the CHE will be interviewed to gain insight into the current reaccreditation process applied as external quality assurance measure. A purposive sample of minimum two participants is required. Attached, please find the research proposal for this study that should be taken into consideration.

**I hereby declare that no conflict of interest exists.** Although I am currently in the employ of the Council on Higher Education, my employer has no vested interest in my study, which is self-funded. The study will not infringe or impinge on the work of any staff member at the CHE who might currently be engaged in research of a similar nature. I am cognisant of UP's plagiarism policy and



hereby declare that this is my own work. I have received approval for the study from the Ethics Committee of the Faculty of Education at UP. This study is the intellectual property of UP.

I hereby provide assurance that the participants' information and data collected during interview will be kept confidential and safe at all times. The anonymity of respondents will be protected throughout the process. Their participation will be entirely voluntary. Written consent to participate in the study will need to be provided. An interview schedule will be made available ahead of time. Interviews will be conducted at the participants' convenience (on a virtual platform if required). Social distancing measures will be observed under the COVID-19 Disaster Management health and safety protocol. I hereby declare that I will respect the research site and participants and conduct myself professionally at all times.

The findings of this study will be included in the thesis in partial fulfilment for the degree, Doctor of Philosophy (Education Management, Law and Policy); published in a peer-reviewed journal; and/or presented at a conference if recommended by my supervisors.

If this request meets your approval, it would be appreciated if the invitation to participate could be circulated among staff members. They may contact me at the email address/cell number below.

Yours sincerely

Zahida Myburgh (Mrs)

Contact details: 072 247 1597/ [zahida.myburgh@gmail.com](mailto:zahida.myburgh@gmail.com)

Supervisor:

Dr T. Calitz  
Faculty of Education  
[talita.calitz@up.ac.za](mailto:talita.calitz@up.ac.za)

Ph: 012 420 5624

Co-Supervisor:

Dr Kolawole Adeyemo  
Faculty of Education  
[samuel.adeyemo@up.ac.za](mailto:samuel.adeyemo@up.ac.za)



... 2021

Prof/Dr/Mr/Ms...

Department of Higher Education and Training

Email:

Dear ...

### **Invitation to interview: participant's consent**

I am currently registered as a student at the University of Pretoria. I hereby request permission to conduct an interview with yourself for the data collection component of my research study. The study comprises semi-structured interviews with staff at the DHET. I have received permission from the Deputy Director-General (see letter attached) to conduct these interviews.

**I hereby declare that no conflict of interest exists.** Although I am currently in the employ of the Council on Higher Education, my employer has no vested interest in my study, which is self-funded. The study will not infringe or impinge on the work of any staff member at the organisation who might currently be engaged in research of a similar nature. I am cognisant of UP's plagiarism policy and hereby declare that this is my own work. I have received approval for the study from the Ethics Committee of the Faculty of Education at UP. The study is the intellectual property of UP.

I hereby provide assurance that the participant's information and data collected during interview will be kept confidential and safe at all times. The anonymity of respondents will be protected throughout the process. Your participation will be entirely voluntary. You will need to provide written consent to participate in the study. An interview schedule will be made available ahead of time. Interviews will be conducted at the participants' convenience (on a virtual platform). Social distancing measures will be observed under the COVID-19 Disaster Management health and safety protocol. I

hereby declare that I will respect the research site and participants, and conduct myself professionally at all times.

The findings of this study will be included in the thesis in partial fulfilment for the degree, Doctor of Philosophy (Education Management, Law and Policy); published in a peer-reviewed journal if recommended by my supervisors; and/or presented at a conference if recommended by my supervisors.

If this request meets your approval, it would be appreciated if you could contact me at the email address below to set up an appointment.

Yours sincerely

Zahida Myburgh (Mrs)

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Supervisor: Dr T. Calitz  
Faculty of Education  
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Ph: 012 420 5624

Co-Supervisor: Dr Kolawole Adeyemo  
Faculty of Education  
[samuel.adeyemo@up.ac.za](mailto:samuel.adeyemo@up.ac.za)



... 2021

**For attention: The Registrar, Head of Academics, Programme Coordinator, Faculty or Department Head, QA Director/Manager, and/or lecturers involved in the programme reaccreditation process**

Institution

Address

Dear ...

**Invitation to interview: participant's consent**

I am currently registered as a student at the University of Pretoria. I hereby request permission to conduct an interview with yourself and colleagues for the data collection component of my research study. The study comprises semi-structured interviews with staff at the (PHEI). I have received permission from the Institution to conduct these interviews.

**I hereby declare that no conflict of interest exists.** Although I am currently in the employ of the Council on Higher Education, my employer has no vested interest in my study, which is self-funded. The study will not infringe or impinge on the work of any staff member at the organisation who might currently be engaged in research of a similar nature. I am cognisant of UP's plagiarism policy and hereby declare that this is my own work. I have received approval for the study from the Ethics Committee of the Faculty of Education at UP. The study is the intellectual property of UP.

I hereby provide assurance that the participant's information and data collected during interview will be kept confidential and safe at all times. The anonymity of respondents will be protected throughout the process. Your participation will be entirely voluntary. You will need to provide written consent to participate in the study. An interview schedule will be made available ahead of time. Interviews will be conducted at the

participants' convenience (on a virtual platform). Social distancing measures will be observed under the COVID-19 Disaster Management health and safety protocol. I hereby declare that I will respect the research site and participants, and conduct myself professionally at all times.

The findings of this study will be included in the thesis in partial fulfilment for the degree, Doctor of Philosophy (Education Management, Law and Policy); published in a peer-reviewed journal if recommended by my supervisors; and/or presented at a conference if recommended by my supervisors.

If this request meets your approval, it would be appreciated if you could contact me at the email address below to set up an appointment.

Yours sincerely

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Co-Supervisor: Dr Kolawole Adeyemo  
Faculty of Education  
[samuel.adeyemo@up.ac.za](mailto:samuel.adeyemo@up.ac.za)



... 2021

Prof/Dr/Mr/Ms

Institution

Email:

Dear ...

### **Invitation to interview: participant's consent**

I am currently registered as a student at the University of Pretoria. I hereby request permission to conduct an interview with yourself for the data collection component of my research study. The study includes semi-structured interviews with members of (PHE Association).

**I hereby declare that no conflict of interest exists.** Although I am currently in the employ of the Council on Higher Education, my employer has no vested interest in my study, which is self-funded. The study will not infringe or impinge on the work of any staff member at the organisation who might currently be engaged in research of a similar nature. I am cognisant of UP's plagiarism policy and hereby declare that this is my own work. I have received approval for the study from the Ethics Committee of the Faculty of Education at UP. The study is the intellectual property of UP.

I hereby provide assurance that the participant's information and data collected during interview will be kept confidential and safe at all times. The anonymity of respondents will be protected throughout the process. Your participation will be entirely voluntary. You will need to provide written consent to participate in the study. An interview schedule will be made available ahead of time. Interviews will be conducted at the participants' convenience (on a virtual platform). Social distancing measures will be observed under the COVID-19 Disaster Management health and safety protocol. I hereby declare that I will respect the research site and participants, and conduct myself professionally at all times.

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## **Appendix B: Interview schedule**

### INTERVIEW SCHEDULE

#### FOR SAQA:

##### Preliminary (introductory) questions:

1. Please introduce yourself and also state your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you would be willing to have this interview recorded, check the transcript of this interview and perhaps answer any follow-up questions (in meeting or via email) at a later date if necessary.
4. Please confirm whether you are involved in the qualification registration process. Explain your role in the process.

##### OPEN-ENDED QUESTIONS:

1. Describe SAQA's specific oversight role in the higher education sector.
2. Describe the process of reaccreditation and reregistration between the DHET and the CHE and/or SAQA. What are the timeframes? Is it a parallel or linear process? Is there a financial cost attached to the process?
3. What is the interval between reregistration cycles? What are the trends identifiable across the past three reregistration cycles, for instance? What are the current trends in the SA PHE sector?
4. Explain the process that follows when a programme is not reaccredited and accreditation is withdrawn. How is this dealt with by the SAQA?
5. Describe the process of deregistration.
6. Are there 'bad actors' (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the reaccreditation process be regarded as a useful process in terms of sifting the 'good and bad' actors in the PHE sector and ensuring that only compliant institutions remain in the system?
7. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are processed within

the expected timeframe for reregistration to occur? Are there any aspects of the process that could be improved? What would this process review achieve?

8. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?
9. A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and ‘protecting’ students against unscrupulous providers?
10. Are you aware of any constraints that PHEIs might face which provide a challenge in terms of compliance?
11. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?

## INTERVIEW SCHEDULE

FOR SAPHE:

### Preliminary (introductory) questions:

1. Please introduce yourself, state the organisation for which you work and also your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you are, or have been, involved in the programme reaccreditation process conducted by the Council on Higher Education. Explain your role in the process at SAPHE or at your own institution, or both.

### OPEN-ENDED QUESTIONS:

1. What was the motivation for starting the organisation? Which services do you provide?
2. How many PHEIs are members of the organisation? Are there specific requirements to join? Describe the composition of the body of members (size, shape, for-profit, NPO, etc.).
3. Do you sift applicants in terms of 'good and bad actors' (compliant vs non-compliant institutions)?
4. Your purpose and objectives are outlined as follows on your website [[www.saphe.ac.za](http://www.saphe.ac.za)]:

The **Purpose** of SAPHE is to:

- Create a platform to facilitate a basis for sharing common ideas and strategies in the interest of PHE,
- Develop strategies and initiatives to promote the role and interest of PHE in SA,
- Develop a network of support and alignment with regulatory authorities and business to facilitate the continuous role of PHE,
- Influence statutory and other regulatory processes to enhance the position and role of PHE,
- Engage and develop the relationship with USAF to contribute to the development of practical collaboration initiatives with Public HE in the interest of a productive HE system in SA,
- Support the development of the capacity of PHE to grow its role and impact in SA and beyond.

With regard to the above:

- 4.1 What do you perceive to be the current position and role of PHE?
- 4.2 Which 'practical collaborative initiatives' with public HE institutions could be to the advantage of PHE?
- 4.3 Is there a need for capacity building in PHE?
- 4.4 Have you provided assistance or capacity development with regard to the reaccreditation process that PHEIs have to undergo on a cyclical basis?  
Describe your involvement.
- 4.5 What kind of support network is there to ensure 'alignment' with regulatory authorities?
- 4.6 Are there barriers encountered by PHEIs to achieve 'alignment'/compliance?
- 4.7 A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be "less regulatory"? What would be the implications for compliance and accountability, and 'protecting' students against possible unscrupulous providers?
5. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?
6. What could be done to enable compliance, capacity building, better relationships between stakeholders (if needed), or engender trust in the HE system?

## INTERVIEW SCHEDULE

### FOR THE PHEI:

#### Preliminary (introductory) questions:

1. Please introduce yourself and state your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you are, or have been, involved in the programme reaccreditation process conducted by the Council on Higher Education. Explain your role in the process.

#### OPEN-ENDED QUESTIONS:

1. Provide an overview of the governance and management structures of the institution.
2. How many programmes are offered by the institution? How do these align with the Vision and Mission of the institution?
3. Which quality management structures are in place at the institution to attend to the internal and external quality assurance processes at programme and institutional level?
4. How many full-time and part-time academic staff are employed? What role do staff play in programme design, programme review and quality management processes?
5. Provide an overview of the budget and provision of resources for each programme and whether the relevant infrastructure and facilities are available for offering of the programme. Is there parity in terms of budgeting and resource provisioning across programmes per site and across sites of delivery?
6. How many reaccreditation cycles has the institution participated in to date?
7. Describe the process from a) reaccreditation of a programme by the Council on Higher Education to b) reregistration of the institution with the Department of Higher Education and Training. Describe the nature of engagement with the CHE, DHET and/or the South African Qualifications Authority and how the requirements of the regulatory 'triad' impact organisational management, quality

- management and quality culture. Is there a cost implication attached to the reaccreditation/reregistration process?
8. Describe the internal procedure followed in preparing for submission of reaccreditation applications to the CHE. Name the role-players and their responsibilities. Also refer to the programme review process.
  9. How many programmes were submitted for evaluation during the last reaccreditation cycle? What was the outcome of the process?
  10. Are there any structural or systemic constraints that prevent the Institution from achieving and/or sustaining compliance with the regulatory bodies?
  11. How are these constraints navigated to achieve compliance?
  12. Was there reflection and review of the reaccreditation process once completed? What was the experience of the institution and feedback from the institutional role-players?
  13. Does feedback from the CHE/DHET and/or SAQA feed into any programme review or quality management process for the purpose of quality enhancement or development?
  14. Which other forms of feedback (from students, industry, and other stakeholders) might be channelled back into a review process? What is the purpose thereof and at which intervals do these occur?
  15. Is it anticipated that the programmes currently on offer could be sustained in the long term? Which socio-economic, political, or other factors would impact programme longevity? What would be the academic and financial impact if a programme offering becomes unsustainable?
  16. Which measures can be put in place internally or by the CHE to better facilitate or strengthen the reaccreditation and quality management processes?
  17. Do you think that PHEIs are over-regulated? Is there an alternative?
  18. What is your opinion on the issue of trust in the PHE sector (i.e. in the quality of PHE programmes and the quality of service) considering that it is viewed as having a profit motive (rather than academic motive)? Is there trust between the PHEIs and the regulatory bodies?

## INTERVIEW SCHEDULE

### FOR THE DHET:

#### Preliminary (introductory) questions:

1. Please introduce yourself and also state your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you are, or have been, involved in the programme reaccreditation and corresponding DHET reregistration process. Explain your role in the process.

#### OPEN-ENDED QUESTIONS:

1. How many reregistration cycles have the DHET engaged in to date?
2. Describe the process of reaccreditation and reregistration between the DHET and the CHE and/or SAQA. What are the timeframes? Is it a parallel or linear process? Is there a financial cost attached to the process?
3. What is the interval between reregistration cycles? What are the trends identifiable across the past three reregistration cycles, for instance? What are the current trends in the SA PHE sector?
4. Explain the process that follows when a programme is not reaccredited and accreditation is withdrawn. Is this action by the CHE met with any objection or resistance from the institution? How is this dealt with by the DHET?
5. Describe the process of deregistration.
6. Are there 'bad actors' (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the reaccreditation process be regarded as a useful process in terms of sifting the 'good and bad' actors in the PHE sector?
7. How can the DHET assist PHEIs in terms of any identified developmental needs?
8. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are processed within the expected timeframe for reregistration to occur? Are there any aspects of the process that could be improved? What would this process review achieve?



9. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?
10. A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and ‘protecting’ students against unscrupulous providers?
11. In your opinion, what accounts for the sustainability of some PHEIs and the de-registration of others?

## INTERVIEW SCHEDULE

### FOR THE CHE:

#### Preliminary (introductory) questions:

1. Please introduce yourself and also state your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you are, or have been, involved in the programme reaccreditation process. Explain your role in the process.

#### OPEN-ENDED QUESTIONS:

1. How many reaccreditation cycles have the CHE engaged in to date?
2. Describe the process for reaccreditation between the DHET, CHE and SAQA. What are the timeframes? Is it a parallel or linear process?
3. Describe the CHE's reaccreditation process. What would be the cost implication if an institution submits 20 reaccreditation applications, for instance? Is it a once-off fee per programme or are there associated costs?
4. Explain the process that follows when a programme is not reaccredited or reaccredited with conditions. Is the institution permitted to continue offering a non-reaccredited programme? In the case of conditions to be met within a stipulated timeframe, how does the CHE verify that the issues have been addressed?
5. What happens in the event that accreditation is withdrawn?
6. How can the CHE assist PHEIs in terms of any identified developmental needs?
7. Are there 'bad actors' (unscrupulous/fraudulent providers) in the PHE sector? In your opinion, could the reaccreditation process be regarded as a useful process in terms of sifting the 'good and bad actors' in the PHE sector?
8. Is the reaccreditation process adequate and appropriate to deliver the anticipated results, for example that all applications for reaccreditation are processed within the expected timeframe? Are there any aspects of the process that could be improved? What would this process review achieve?
9. A recent study (by Stander and Herman; 2017) found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated

and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and ‘protecting’ students against unscrupulous providers?

10. Is there trust in the system (trust in the PHE sector; between the CHE and PHEIs; between the DHET and CHE and/or SAQA; between the DHET and PHEIs)? Has trust been eroded? Can trust be rebuilt?
11. Can the external QA process be improved? What would be the benefits?
12. In your opinion, what accounts for some PHEIs being able to achieve compliance while programme accreditation is withdrawn for others?

## INTERVIEW SCHEDULE

### FOR APPETD:

#### Preliminary (introductory) questions:

1. Please introduce yourself, state the organisation for which you work and also your position at the organisation.
2. Please confirm that you have been informed that your participation is voluntary and that you can exit at any point. Please also confirm that you have signed a consent form to participate in this interview.
3. Please confirm whether you are, or have been, involved in the programme reaccreditation process conducted by the Council on Higher Education. Explain your role in the process at APPETD or at your own institution, or both.

### OPEN-ENDED QUESTIONS:

1. What was the motivation for starting the organisation? Which services do you provide?
2. How many PHEIs are members of the organisation? Are there specific requirements to join? Describe the composition of the body of members (size, shape, for-profit, NPO, etc.).
3. Do you sift applicants in terms of 'good and bad actors' (compliant vs non-compliant institutions)?
4. Your mission statement (<https://www.appetd.org.za/about-us/>) includes "Capacitating new and existing providers to engage constructively in improving mechanisms of delivery for quality in education, training and development delivery". Who identified the need for capacity building? Is there a need for capacity building in the PHE sector? What would that need encompass? How many PHEIs have been engaged in capacity development? What does 'capacitating' entail (in which area/s, form of engagement, which 'mechanisms', etc.)?
5. The APPETD mission statement further indicates the endeavour to "Growing a presence for quality education and training provision within government,

regulatory and professional bodies”. What does this mean in relation to government and regulatory bodies, such as the CHE and SAQA, specifically? How does this relate to a service provided for your members?

6. It is indicated on your website that, through collaboration, you are “informing and guiding members regarding best institutional, educational and quality practices”. Define ‘best’ in terms of standards. Would this include guidance on the CHE’s quality standards? Which platforms are used to inform and guide APPETD members?
7. It is also indicated that, through collaboration, APPETD assists with the “development and empowerment of members to be effective, sustainable organisations”. Are there systemic or structural constraints that hinder sustainability? How can these be addressed if need be?
8. Have you provided assistance or capacity development with regard to the reaccreditation process that PHEIs have to undergo on a cyclical basis? Describe your involvement.
9. A recent study found that PHEIs found QA to be complex and difficult to manage. PHEIs also felt that they were over-regulated and identified the need for a developmental approach. What is your view on this? Is there a need to regulate? Can the CHE, DHET and SAQA be “less regulatory”? What would be the implications for compliance and accountability, and ‘protecting’ students against possible unscrupulous providers?
10. What could be done to enable compliance, capacity building, better relationships between stakeholders (if needed), or engender greater trust in the HE system?

## Appendix C: Participant's written consent form

### PARTICIPANT'S WRITTEN CONSENT

Title of study: ***Quality management of reaccreditation processes in private higher education institutions in South Africa***

Research Aims/Purpose Statement:

The study aims to investigate the reasons why programmes might not meet the minimum standards of the accreditation criteria to be reaccredited, the challenges that PHEIs possibly face, how they might navigate and address the constraints to achieve compliance, and how they sustain their efforts to ensure continued compliance. The aim is also to identify the internal quality management processes and determine which mechanisms could be established or fortified to enable the sustainability and quality enhancement of a higher education programme.

Please read the following statements and TICK (✓) next to each if you would like to participate in this study:

- I have read and understood the purpose of the study.
- I have noted the declaration of the student that there is no conflict of interest.
- I have noted the assurance that my participation will be anonymous and voluntary, and that I may withdraw from the study at any time.
- I have noted the ethical considerations for this study.
- I have noted that the data will be kept in storage at the university and that the findings will be reported as part of a thesis that will be disseminated upon recommendation by relevant supervisors and as authorised by relevant UP authorities.
- I have noted the ethical considerations and guarantee of the trustworthiness of the study.
- I have noted the student's declaration that she is aware of UP policies, including those relevant to the prevention of plagiarism.
- I am knowledgeable on the subject under review in this study and participate in the relevant processes at my institution which is a requirement for this study.

I, \_\_\_\_\_ (full name in block letters), hereby undertake to participate in this study, free of coercion, obligation and entirely voluntary. I declared that I am an adult \_\_\_\_\_ (M/F) of sound mind, currently employed as \_\_\_\_\_ (position) at the \_\_\_\_\_ (institution). I have read and understood all of the above, acknowledge and accept all declarations above. I reserve the right to withdraw from this study at any time of my own volition without fear of reprisal. I will not be held liable for such a decision and my contribution (if any provided prior to withdrawal) may not be used for the study at any time of the research and reporting process.

I hereby assent to my full participation in interview and have liaised with the student to agree on this scheduled meeting at a place, date and time for my convenience. I consent to checking the transcribed interview notes and participating in a follow-up interview session if so required. I reserve the right to withdraw from either of the two aforementioned activities if I so wish and acknowledge that the data will continue to be used for the study, regardless, unless I retract my contribution in writing. I will engage with the student in a professional manner and will not hold any authority/ interest in this study beyond the relevance of my participation.

Please note further:

We also would like to request your permission to use your data, confidentially and anonymously, for further research purposes, as the data sets are the intellectual property of the University of Pretoria. Further research may include secondary data analysis and using the data for teaching purposes. The confidentiality and privacy applicable to this study will be binding on future research studies.

Signed at \_\_\_\_\_ on this the \_\_\_ day of \_\_\_\_\_ 2021.

Signature: \_\_\_\_\_



## Appendix D: Register of Private Higher Education Institutions (Issued 5 October 2020 [Last Update 21 September 2020] to 13 September 2021)



### REGISTER OF PRIVATE HIGHER EDUCATION INSTITUTIONS

LAST UPDATE 21 September 2020

This register of private higher education institutions (hereafter referred to as the Register) is published in accordance with section 54(2)(a)(i) of the *Higher Education Act, 1997 (Act No. 101 of 1997)* (hereafter referred to as the Act). In terms of section 56(1) (a), any member of the public has the right to inspect the Register.

#### IMPORTANT NOTE FOR THE MEDIA

The Department of Higher Education and Training (hereafter referred to as "the Department") recognizes that the information contained in the Register is of public interest and that the public may wish to publish it. In order to avoid misrepresentation in the public domain, the Department of Higher Education and Training kindly requests that all published lists of registered institutions are accompanied by the relevant explanatory information, and include the registered qualifications of each institution.

The Register is available for inspection at: <http://www.dhet.gov.za>. Look under Documents/Registers



### REGISTER OF PRIVATE HIGHER EDUCATION INSTITUTIONS

LAST UPDATE 2 FEBRUARY 2021

This register of private higher education institutions (hereafter referred to as the Register) is published in accordance with section 54(2)(a)(i) of the *Higher Education Act, 1997 (Act No. 101 of 1997)* (hereafter referred to as the Act). In terms of section 56(1) (a), any member of the public has the right to inspect the Register.

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**REGISTER OF PRIVATE HIGHER EDUCATION INSTITUTIONS**

**LAST UPDATE 2 AUGUST 2021**

This register of private higher education institutions (hereafter referred to as the Register) is published in accordance with section 54(2)(a)(i) of the *Higher Education Act, 1997 (Act No. 101 of 1997)* (hereafter referred to as the Act). In terms of section 56(1) (a), any member of the public has the right to inspect the Register.

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**REGISTER OF PRIVATE HIGHER EDUCATION INSTITUTIONS**

**LAST UPDATE 30 June 2021**

This register of private higher education institutions (hereafter referred to as the Register) is published in accordance with section 54(2)(a)(i) of the *Higher Education Act, 1997 (Act No. 101 of 1997)* (hereafter referred to as the Act). In terms of section 56(1) (a), any member of the public has the right to inspect the Register.

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The Register is available for inspection at <http://www.dhet.gov.za>. Look under Documents/Registers



**REGISTER OF PRIVATE HIGHER EDUCATION INSTITUTIONS**

**LAST UPDATE 13 SEPTEMBER 2021**

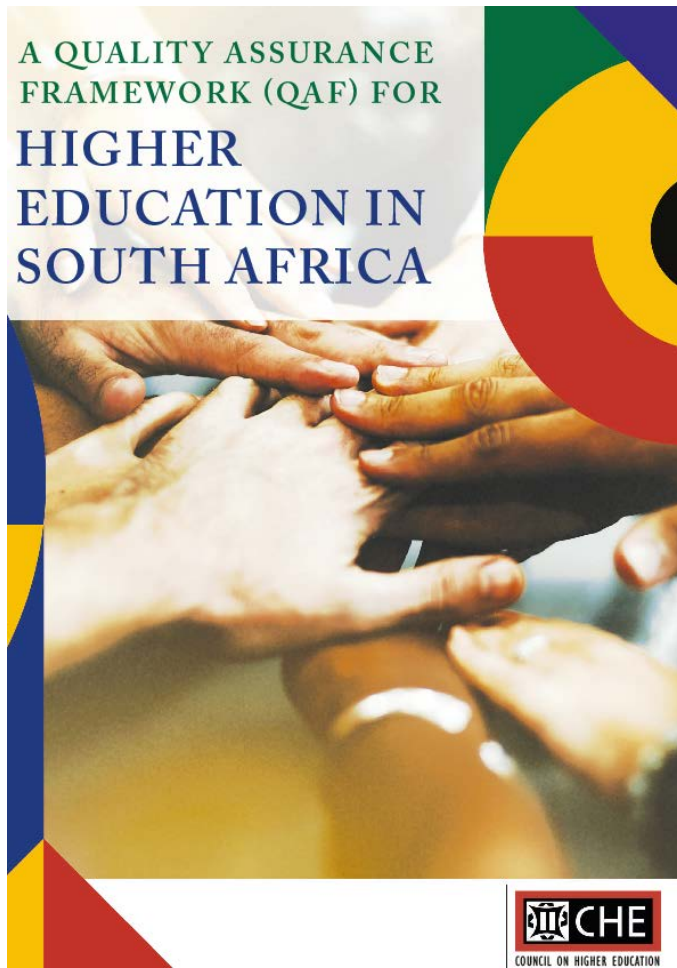
This register of private higher education institutions (hereafter referred to as the Register) is published in accordance with section 54(2)(a)(i) of the *Higher Education Act, 1997 (Act No. 101 of 1997)* (hereafter referred to as the Act). In terms of section 56(1) (a), any member of the public has the right to inspect the Register.

**IMPORTANT NOTE FOR THE MEDIA**

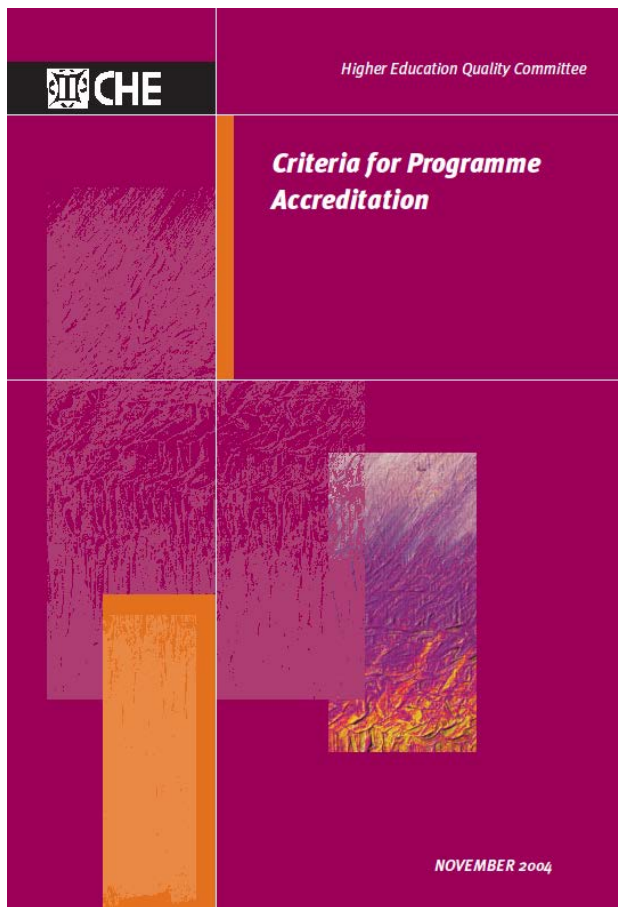
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**Appendix E: QAF (CHE, 2021)**



## Appendix F: Criteria for programme accreditation (CHE2004b; 2012)





Criteria for Programme Accreditation

September 2004, revised June 2012

## SUMMARY OF CRITERIA FOR PROGRAMME ACCREDITATION

	<b>Programme areas</b>	<b>Criterion</b>
INPUT	Programme design	1
	Student recruitment, admission and selection	2
	Staffing	3 & 4
	Teaching and learning strategy	5
	Student assessment policies and procedures	6
	Infrastructure and library resources	7
	Programme administrative services	8
	Postgraduate policies, regulations and procedures	9
PROCESS	Programme coordination	10
	Academic development for student success	11
	Teaching and learning interactions	12
	Student assessment practices	13 & 14
	Coordination of work-based learning	15
	Delivery of postgraduate programmes	16
OUTPUT AND IMPACT	Student retention and throughput rates	17
	Programme impact	18
REVIEW	All of the above programme areas	19

(Council on Higher Education (CHE), 2004b)

## Appendix G: Framework for institutional audits (CHE, 2021)

