

**BACKGROUND AND DISCUSSION PAPER**

**Development of a Framework for the Recognition  
of Short Courses in Namibia**

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**for the**

**Namibia Qualifications Authority**

**Wider Consultation Version**

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## 1. Introduction

- 1.1. All learning has value. At times, however, the value may not be immediately detectable or be associated with a known purpose. This may, perhaps, be one of the factors that differentiates formal, structured learning from non-formal and informal learning. In many cases involving non formal and informal learning, the ‘absence’ of value reflects that outcomes of learning are not easily expressed or assessed.
- 1.2. The National Qualifications Framework of Namibia is premised on valuing all learning. Two of the principles underpinning the NQF have particular significance:
  - Namibians have rights to accessing learning lifelong regardless to where, when and how that learning is undertaken
  - the qualifications system must be able to give recognition to all learning and encompass all qualifications attained in Namibia.
- 1.3. The NQF is, however, a qualification system – and qualifications are only awarded following robust and quality assured assessment after learning has taken place. The NQF is an outcomes or results-based system. It is not a record of the (often multiple and varied) learning pathways that equip people to gain a qualification to have their abilities formally recognised.
- 1.4. The regulatory provisions for education and training in Namibia have specificity in regards to formal learning that, through quality assured assessment, results in the award of qualifications and awards registered on the NQF. The teaching and learning associated with these qualifications and awards is subject to independent verification of quality through the accreditation and/or registration of education and training institutions and organisations and their courses and programmes.
- 1.5. Learning opportunities that are not associated with qualifications or assessment seem, however, to be largely overlooked in the regulatory provisions. Often, these learning opportunities are available through short courses. The apparent absence of quality assurance of these opportunities and the institutions and organisations offering them has resulted in the learning not being formally recognised by authorities and stakeholders in Namibia. This lack of recognition means that learning for many Namibians does not enable entry into or progression through lifelong learning or career pathways. The accepted principles regarding the value of any learning is not necessarily encompassed in practice.

- 1.6. As a consequence, the Namibia Qualifications Authority (with the active involvement of the Namibia Training Authority and National Council for Higher Education), as the recognised custodian of the qualifications system and the related accreditation system, has called for this investigation into whether formal recognition should be extended to encompass learning from short courses and how such learning and the providers of the learning could be recognised.
  
- 1.7. The central intent of the investigation is to explore options for assigning a status to any course that does not include robust summative assessment and, thus, result in a recognised award or qualification that would optimise the utility of taking the course to learners.

## 2. Interpretations

- 2.1. The terms of reference for this project sought soundly-based advice towards the development of a framework for the recognition of short courses in Namibia. In order to source and formulate this advice it was necessary to derive some clarity regarding the meaning of some of the key terms.

### *Framework*

- 2.2. A framework is a supporting structure around which something can be built. For example, the National Qualifications Framework of Namibia (NQF) consists of structures such as expressions of outcomes of learning, Level Descriptors and Credits around which qualification and qualification components can be created, expressed and registered. It is not, however, anticipated that this investigation into the recognition of short courses will lead to a comparable register of courses. It is considered that a listing of all ‘recognised’ courses is currently available through the Scope of Accreditation certificates and listings for the respective providers.
- 2.3. The term *framework* can also refer to an approach to doing something, a device or method that allows things to be planned or decided upon. These are usually premised on a system(s) of rules, ideas or beliefs. It is this interpretation that has been adopted in this Discussion Paper – the intent is to develop a suitable structure based on agreed understandings that will enable decisions on the recognition (or otherwise) of short courses in Namibia.

### *Recognition*

- 2.4. Dictionary interpretations of this term refer to an approval or a process related to approving something. For example, recognition could represent an agreement that something is true or legal. It could also be an acknowledgement of respect for someone or something – that they or it has admirable qualities. Recognition could also refer to knowing something about a person or object because of prior experience(s) of the person or object.
- 2.5. In relation to this investigation, what is the focus of any *recognition*? Is it:
- the course, as documented?
  - the provider of the course?
  - the delivery of the course – the context and processes involved?

- the results or outcomes arising from the course?
- all of the above?
- some of the above?

A documented course can be closely scrutinised and judgements about its qualities expressed. But the qualities of a course as expressed on paper do not necessarily equate to the qualities of the course as delivered. A very well structured and written course could be delivered and managed poorly in an unsuitable context. Any recognition of a course should, perhaps, be viewed in a holistic manner.

2.6. The term *recognition* has, for the purposes of this Discussion Paper, been interpreted as being an expression that a course, its delivery and the provider of the course, has certain **qualities that make the outcomes of the course acceptable for or in other formal processes**. These ‘other’ formal purposes could be:

- Accreditation by the NQA as per the provisions and requirements of the Regulations for the Accreditation of Persons, Institutions or Organisations: Namibia Qualifications Authority Act, 1996 (published as Government Notice 124 of 2006) in order that a recognised qualification may be awarded
- the awarding of a qualification eligible for Evaluation by the NQA as per Regulations Relating to Evaluation of Qualifications: Namibia Qualifications Authority Act, 1996 (published as Government Notice 182 of 2007)
- eligibility for claims of refunds against the VET Levy as per the Regulations relating to the use of Vocational and Training Levies for Funding Vocational Education and Training Programmes and Projects and for Providing Technical and Financial Assistance: Vocational Education and Training Act, 2008 (published as Government Notice 5 of 2014)
- endorsement by a regulatory body or statutory professional body, perhaps for professional membership or permission to work or operate.

2.7. The term *recognition* could also be used in less formal applications. For example, recognition could be used in or as statements of:

- credibility
- usefulness to the developmental or interest needs of learners or employers, etc
- value in being a likely contributor of evidence in recognition of prior learning or experiences (RPL).

## *Courses*

2.8. In November 2009 the NQA Council made a number of decisions regarding the interpretation of the term *courses* as used in Section 13 of the Namibia Qualifications Authority Act 1996 and the 2006 Accreditation Regulations. The term ‘course’ was defined as:

*a coherent and managed pathway of learning or training and/or component of a specified, coherent and managed pathway that is based on clear and consistent aims, content, outcomes of learning and assessment practices relevant to the requirements of a quality assured award(s) and/or qualification(s).*

2.9. Further associated decisions of interest included:

- ‘Courses’ shall be deemed to have characteristics that align, as a minimum, with Element 2.2 (2) of the Accreditation Standard (Annexure B of the Accreditation Regulations)
- ‘Courses’ linked to degree level studies shall, in addition, be deemed to have characteristics that align, as a minimum, with Element 2.2 (6) of the Accreditation Standard
- the term ‘courses’ shall, for accreditation purposes, be deemed to be inclusive of alternative nomenclature ... such as ‘programme’, ‘module’, ‘unit’, ‘subject’
- the term ‘course’ shall not be considered as an alternative to the term ‘qualification’ (though the name of each may be the same)
- accreditation decisions made by Council shall refer to named courses and named qualifications that these courses are pathways to.

2.10. These decisions limited recognition by way of accreditation by the NQA to learning and training activities that:

- have clear, specified purpose(s)
- result in the attainment of outcomes of learning (new knowledge, skills and/or attributes)
- are inclusive of attainment proven through summative assessment
- are well managed (including delivered)
- result in a named qualification.

2.11. What has emerged in recent years has been a number of requests to the NQA for formal recognition of pathways or activities (particularly those of a short duration)

that do not reflect all of the above features. The principal area of interest appears to be the decision that required the alignment of a course with a named qualification in order for the course to be eligible for the grant of accreditation.

- 2.12. The requests being expressed by providers, learners and employers have been the principal motivation towards the need for this Discussion Paper.

### ***Short courses***

- 2.13. It is accepted that participation in short courses is a significant activity in lifelong learning. It is also accepted that the provision of short courses is not a new phenomenon. Continuing education courses and non-formal adult education, traditional hallmarks of short course provision, have been particularly common in countries where access to formal education and training has been previously denied to many.
- 2.14. Learning from short courses can contribute to personal, academic, career and/or professional development of individuals and groups of people. Short courses may also be tailored to meet the needs of organisations, communities and professional bodies.
- 2.15. What, exactly, is a ‘short’ course? A possible answer is that it is any course of learning that results in something less than a whole qualification. In Namibia, it could refer to a course of learning that leads to the award of a registered component of a NQF (or similar) registered qualification(s) – eg, a unit standard - or a credit bearing component of a NQF registered qualification.
- 2.16. In some countries (eg, Republic of South Africa), minimum NQF qualification credit requirements mean that *short courses* refer to durational periods of less than one academic year unless the course leads to the award of a unit standard on the same Framework.
- 2.17. In Namibia, the minimum credit value for an award registered on the NQF translates to being approximately 10 hours of learner effort, inclusive of assessment. A short course could, therefore, be of **less than one day** where the assessment component requires the completion of a project or assignment, etc conducted after the course was facilitated.
- 2.18. In Namibia, a *short* course has also, to date, commonly been interpreted as being of limited duration, generally involving less than 400 hours of learning by learners.

- 2.19. The term ‘short course’ is seen in a number of countries as being somewhat problematic, particularly when associated learning is viewed as being less valuable. Despite the term being problematic, however, the term ‘short course’ has a global usage and is readily understandable to people. This may be a sound reason why an attempt at creating new nomenclature for such courses should be avoided in Namibia.
- 2.20. There are, however, some potential benefits in identifying Namibian interpretations of the nature of courses covered by the term. The differentiation between types of courses could enable the application of different and appropriate quality assurance processes that will give a recognised status to the learning from the courses. Such recognition may be desirable so as to optimise, particularly for learners, the value and acceptance of the learning derived from their participation in short courses.
- 2.21. Not all learning, however, must lead to the award of a qualification for it to be valuable. Not all learning must be highly regulated. However, regulation is needed where learning does lead or is closely aligned with a qualification in order to consolidate the broader credibility of the learning.

### **3. Short courses reflect a broad range of types**

- 3.1. There is a broad range of education and training options that could be referred to as *short courses*. The options can be broken into two main categories – Credit Bearing and non-Credit Bearing – with each of these comprising sub-categorisations:

#### ***Credit Bearing Courses***

- 3.2. These courses have a direct relationship with NQF awards and qualifications and/or with the NQF Levels and Credits systems.

#### **Those with a direct relationship with the NQF**

- 3.2.1. Courses in this subcategory result in the awarding or recording of attainment of NQF awards (such as registered unit standards) or with outcomes of learning related to identified components of registered NQF qualifications (they would likely be recorded on a transcript of learning issued by the relevant institution). They could also result in awards relating to qualifications formally recognised on qualification systems or quality assured systems similar to those of the NQF of Namibia (ie, those qualifications that are eligible for Evaluation by the NQA). Courses in this sub category have a quality assured assessment component and are (and the providers of these courses) presently covered by the current Accreditation Regulations and systems.

#### **Those with a potential alignment with the NQF**

- 3.2.2. The outcomes of learning arising from courses in this subcategory could be aligned with NQF Levels and NQF Credits<sup>1</sup> and used in recognition of prior learning processes and articulation arrangements.
- 3.2.3. Courses in this subcategory are not directly associated with NQF (or similar) awards and qualifications – but could readily be associated with NQF structural mechanisms. In many cases, short courses are made available to prompt learning or skills acquisition. People take these courses (or employers will purchase them on behalf of their staff) because they take the learner from a present to a new

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<sup>1</sup> Regulation 4 (4) (b) of the Regulations Relating To Evaluation Of Qualifications Namibia Qualifications Authority Act, 1996 (Government Notice 182 of 2007) makes use of a similar process. Decisions that cannot be expressed as a whole qualification can make reference to a specified volume of NQF Credits at a specified NQF Level in a specified subject area.

place in terms of their ability(ies). Thus, these courses generate outcomes of learning that can be:

- expressed as an ability – they are able to do something – as the outcomes of learning are expressed for the NQF
- perhaps related to a component of the NQF Classification System (Fields, Subfields and Domains, Designators and Qualifiers)
- aligned, on a best-fit basis, with one of the ten NQF Levels
- allocated a value comparable to NQF Credits – they reflect at least 10 hours of notional learning<sup>2</sup>.

3.2.4. For RPL and articulation to be given effect, there would need to be some proof of attainment of the relevant outcome(s) of learning. Thus, there would need to have been some form of summative assessment.

3.2.5. Courses in this sub category are (and the providers of these courses) presently covered by the current Accreditation Regulations – particularly by the provisions of Element 2.2 (2) of Annexure B (see reference in the next section). However, the NQA Council decision to only accredit courses that lead to named awards and qualifications (and qualifications eligible for Evaluation) would have to be amended if recognition by way of accreditation was to be conferred.

### *Non-Credit Bearing Courses*

3.3. Courses in this category have traditionally been those where Certificates and/or Letters of Attendance are issued to the participants. Short courses in this category generally fall outside the ambit or intended scope of any NQF system<sup>3</sup>. This may be because:

- The attainment of any outcome of learning represents learning effort less than that associated with 1 NQF Credit (for example, at a seminar, colloquium, or one-day workshop).
- The intended purpose of the short course was not aimed at the award of ‘credit’ because it was essentially for ‘personal enrichment’<sup>4</sup>. Consequently, there was no summative assessment.

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<sup>2</sup> Courses that involve less than 10 hours of learning would have to be placed in the non-credit bearing category.

<sup>3</sup> Such courses are sometimes referred to under a number of terms: ‘continuing education courses’; ‘adult learning courses’; ‘community outreach programmes’; ‘access programmes’; ‘capacity building programmes’; ‘corporate courses’; ‘extra-mural courses’; etc.

<sup>4</sup> It is acknowledged that a short course could be offered with a duality of purposes. Some people may take the course with the intention of deriving credit. Others may take it simply for personal enrichment. Where such a course has a duality of purposes it will be considered to be a credit-bearing short course.

- The course represented specialised learning to meet a particular purpose related to information sharing or updating (but not-for-credit). For example:
  - a Refresher Course for professionals
  - Briefings on changes to Regulations or Codes of Practice, etc.
- The course represented highly customised learning (but not-for-credit). For example:
  - Product/process/equipment-specific training (eg, training related to new beauty products, new vehicle parts, new computer programme application, etc)
  - Vendor-specific training (eg Microsoft, Oracle, Novell training, etc) – often ‘industry-credentialled’ to the extent that the industry and/or employer will give recognition or will give the learner employment.
  - Socio-political development (eg, training of Election officials, health promotion such as immunisation programmes, etc).

### **Professional courses**

- 3.3.1. These courses relate to recognition by statutory or professional bodies for formal, practice (rather than qualification) processes (such as retaining professional membership or meeting required ongoing professional development obligations). Participation is often by way of attendance at seminars, conferences or undertaking projects, etc. In some cases, more extensive interventions are involved, some of which require pass marks in related examinations.
- 3.3.2. It is common for courses and providers of such courses to be required to meet criteria (such as content, duration, facilitator qualifications, etc) prescribed by the statutory or professional body. Such bodies verify that criteria have been met and publish lists of ‘approved courses’.
- 3.3.3. It is, perhaps, a preferred option that recognition of such courses should remain, because of their special nature, within the ambit of responsibility of the relevant body. Providers of such courses would need to establish that their course is for a specific purpose. The relevant body could, however, also require that relevant courses be accredited.

### **Personal enrichment and/or special-purpose courses**

- 3.3.4. Participation in courses in this category is motivated by personal interest or enrichment or is for customised, particular purposes (not for credit) such as courses related to staff involved in the national registration of voters, the conduct of elections, or the introduction of new technology (ie, they are offered at irregular intervals or on an as-needed basis). The courses are not intended to relate to any specific outcome(s) of learning related to any named award or qualification or any NQF structural mechanism.
- 3.3.5. Courses in this subcategory usually fall outside any eligibility for public funding or for the attainment of immigration permits.
- 3.3.6. The provision of such courses is often covered by:
- no arrangements – it is a case of *caveat emptor* – let the buyer beware, or
  - contractual agreements between the relevant parties.
- 3.3.7. Participation in this type of course does not lead to any recognition by a quality assurance, statutory or professional body. Providers of education and training, and employers undertaking recruitment activities, generally recognise these courses on a case by case basis.

#### **4. Expectations of some Namibian Providers of Short Courses**

- 4.1. As noted earlier, the NQA has been approached by providers of short courses in Namibia to have their courses ‘authenticated’, ‘recognised’, ‘accredited’. Their approaches indicate a desire for Accreditation (and Registration with the NTA as many have also made enquiries with the NTA) rather than them seeking an alternative to accreditation. They are not looking to avoid the demands of becoming accredited – they see the obvious benefits of the external assurances of quality that the grant of accreditation confers on the provider and their courses.
- 4.2. Many of these providers are responding to obvious expressions and social indicators within Namibia of needs for personal and skills development. The courses often address both personal interest and career/vocational-related benefits. The courses are often delivered in shorter periods so as to make them more accessible to prospective learners.
- 4.3. The providers generally give Certificates of Attendance as a means to indicate that an individual has undertaken some formal learning experience. Attendance requirements are often supplemented by some form of assessment – presentations, projects, written and oral tests. However, because the courses offered do not require at least 400 hours of learner efforts or result in the awarding of credits for NQF unit standards they are currently precluded from any accreditation consideration by the NQA.
- 4.4. In some instances, the courses offered lead to readiness of the participants for assessments by international bodies that result in industry-accepted certification. Assessment and certification conducted by other bodies is not uncommon within Namibia and accreditation by the NQA is still possible. There is an expectation that formative assessments conducted by the Namibian entity is of good quality and accurately reports on attainment as readiness for the ‘external’ examinations. More importantly, however, is a need for assurances offered to learners, through accreditation and registration, of the quality of services that will be delivered to them - and of their treatment as learners and customers.
- 4.5. The courses that have clear career or vocational benefits may not be related to existing NQF unit standards. The unit standards registered on the NQF tend to have a very occupational-focused context in which ability must be demonstrated, even though they may also require what can be seen as ‘generic’ abilities. The absence of ‘generic’ unit standards for such things as customer care, workplace behaviours, interaction with others, etc, make it difficult for the providers to seek accreditation for courses related to NQF awards.

- 4.6. The processes and demands of getting unit standards registered on the NQF make it difficult for providers to utilise this option towards the recognition of their courses. The requirement for obtaining stakeholder support for what are seen as Namibian standards is, perhaps, the greatest obstacle.
- 4.7. The courses offered often do, however, have an observable relationship with some of the Elements and/or Performance Criteria of the registered unit standards. Consequently, an outcome(s) of learning and awarding criteria could be expressed for the courses offered.
- 4.8. Partial award of NQF Credits is not possible under the NQF Regulations. However, the observable relationship could, likely, be expressed using the NQF Levels and NQF Credits systems. The relationship could be expressed as a quantum of learner effort aligned with a NQF Level of complexity. This relationship could, if formally recognised through external assurances of the quality of provision and assessment, be transferable to other learning and certification through Recognition of Prior Learning processes. The assurances of quality would enhance the transferability of the prior learning and any related attainment.
- 4.9. Outcomes of learning may not be restricted to the individuals who participate in learning. The outcomes could also be for companies, organisations and institutions. Employers often arrange training for their staff as a means for improving productivity, for diversifying or strengthening their market presence, etc. These outcomes may not, however, be readily related to NQF Levels and Credit systems – and would perhaps fall outside the scope of accreditation processes. However, if the economic or cost-reduction gains to a company or organisation could be quantified, then perhaps the ‘value’ of the relevant courses could be recognised through eligibility for reimbursement under the VET Levy administered by the NTA<sup>5</sup>.

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<sup>5</sup> The current provisions of the VET Levy require that claims for refunds be made at the end of the year in which the course was delivered. The ‘returns’ to the company or organization may, however, only accrue after some period of time later. The NTA would, perhaps, need to investigate some mechanism to grant interim payments until such time as the benefits from the training could be reliably proven.

## **Multi-faceted providers**

- 4.10. Providers could be offering courses that are credit-bearing, potentially credit-bearing and/or non-credit bearing. If a provider is ‘approved’<sup>6</sup> because of their offerings in the Credit-bearing category (perhaps because they are registered with the NTA or NCHE and/or accredited by the NQA), this may be sufficient assurances of the quality (albeit with some risks) of the nature of a non-credit bearing course offered by them.

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<sup>6</sup> Care and caution must apply. Any term used to reflect the nature of the non-credit bearing course or the provider should not become confused with a term already having a significant meaning with relation to credit-bearing courses. Any confusion may be exploited by some providers and learners are misled into enrolments.

## **5. International practices for the recognition of short courses**

- 5.1. Searches using the Internet indicate that very few national quality assurance bodies similar to those of Namibia give formal recognition to non-credit bearing short courses. Where recognition is given, quality assurance activities follow accreditation-type processes for courses clearly linked to qualifications or credit-bearing awards and components of qualifications registered on the national qualification systems.
- 5.2. One can find arguments that quality assurance and recognition of any course, including short courses, cannot and is not carried out by all national accreditation bodies because there is such a plethora of courses and accreditation bodies that complete recognition is not feasible. It is often claimed that recognition in one way does not necessarily mean recognition in other ways. Such arguments are often made by providers who are members of international organisations that provide quality assurance services to the members, often using standards similar to those of national agencies rather than from national agencies – claiming that accreditation with national bodies adds little value but only adds to administration and compliance costs. Member organisations often associate with providers that are, in part or in whole, recognised by national agencies and/or with selected professional or industry bodies. This is used to give credibility to courses offered.
- 5.3. What follows are examples of recognition practices that appear to be the most common in the international domain.

### **South Africa**

- 5.4. With a NQF and quality assurance regimes comparable to those in Namibia it is useful to look at the recognition of short courses in South Africa. It is further of use as many providers of short courses in Namibia are from the RSA.
- 5.5. The advent of the NQF in South Africa led to a highlighting of differences between formal and non-formal learning (as well as informal learning). Formal learning was perceived to be structured and qualifications-linked. Non-formal learning did not have a direct link to qualifications. Some non-formal courses were, however, well-structured and of good quality.

5.6. Short courses have, however, been seen as an essential part of the education and training systems. They are seen as being useful complements to longer term and structured programmes, particularly in terms of:

- ‘just in time’ and ‘just enough’ learning to meet specific needs in the workplace – up-skilling because of the emergence of new technologies, legislation, regulations and policies, etc
- meeting and contributing to continued professional development requirements in the professions – in-service training
- the need for targeted interventions to close skills gaps, bridge into new or advanced learning, etc
- facilitation and promotion of national life-long learning goals.

5.7. The important status given to short courses was recognised in the publication of Criteria and Guidelines for Short Courses and Skills Programmes by the South African Qualifications Authority (SAQA) in 2004. It was SAQA’s preference at that time that the provision of short courses should be subject to the accreditation and quality assurance processes that were put in place for providers offering programmes for ‘full’ qualifications<sup>7</sup> – certificates, diplomas and degrees. This stated preference was strongest for instances where the provision of short courses was eligible for public funding and/or the award of credits for NQF registered unit standards and qualifications. However, SAQA limited its authority for the quality assurance of education and training to courses and providers for full qualifications. It did not require that the accreditation and quality assurance systems be applied to short courses.

5.8. Thus, in recent years, SAQA has not recognized learning for short courses where these are not aligned with NQF awards and qualifications. Skills programmes – longer ‘short courses’ and defined in the Skills Development Act – aligned to registered unit standards were able to be recognised so long as requirements for rules of combination were met (as in Workplace Skills Plans and Workplace Skills Implementation Plans related to the Skills Development Levy system of the Department of Labour). Modules offered at higher education institutions (also referred to as continuing education courses) were also not recognised by SAQA. The Higher Education Quality Committee (HEQC) did, however, allow institutions<sup>8</sup> to conduct their own quality assurance of short courses

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<sup>7</sup> The minimum credit value for a certificate qualification in the NQF of South Africa is 120 Credits – about 1200 hours of learner effort. Thus, a short course (or programme) was a learning event intended to take less than this number of hours.

<sup>8</sup> This delegation is currently being investigated as some people consider it to be outside the legal mandate of the HEQC. The practice continues albeit with acceptance that improvements are warranted.

(both credit and non-credit bearing<sup>9</sup>) using methodologies deemed appropriate by the Council. This delegated authority has attracted some criticism as quality is not always fully assured – and some students are charged high fees for courses that do not lead to a qualification or acceptance by others.

- 5.9. The SAQA has resisted any moves towards including short courses on the NQF – it is, after all, a qualifications framework rather than a training or learning framework (qualifications are seen, as in Namibia, as an outcome of training or learning once assessment has been conducted).
- 5.10. In 2000 the SAQA embarked on a process of recording short courses in an attempt to bring providers of them into the standards-setting and quality assurance process for the education and training system as a whole. This process was halted in November 2001 – it was difficult to capture information on all courses and providers and the recording was being done at the same time that standards setting and industry bodies were themselves being established – they were not ready to deal with short courses. The process also created some confusion in the marketplace, with some providers believing that a listing of their course gave them a licence to market the course as ‘SAQA recognised’.
- 5.11. The 2004 Criteria and Guidelines are scheduled to be reviewed – likely this year. Structural changes in the funding and quality assurance systems and some changed features of the NQF have made them outdated. New policy developments and the emergence of Sub-Frameworks for higher education qualifications, general and further education qualifications and occupational qualifications have also created a need for a revisiting of recognition for “short courses”, “continuing education courses” and “skills programmes”.
- 5.12. A White Paper on Post-School Education and Training (released in 2014) suggested that learning that does not lead to a qualification “need not be rigorously quality assured, as long as it meets the needs of learners, the relevant government department, private employer or community”. The White Paper continued by stating that “non-formal education provision targeted at specific community needs, as well as ongoing professional development, need not always lead to a qualification or be provided through accredited providers”. These statements were likely intended to encourage lifelong learning but have since created some confusion related to quality assurance processes.
- 5.13. It is likely, therefore, that a Working Group will be established to develop good practice principles for “learning that does not lead to qualifications” – a term being used to avoid

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<sup>9</sup> Certificates of competence are usually awarded for credit-bearing short courses as formative and/or summative assessment (subject to Moderation practices) is required. Attendance-only Certificates are issued for short courses where there is no assessment required.

what has become a problematic term – “short courses” – as there was a perception that the status of the course was related to its duration rather than its link with the qualifications system. The Working Group may also be charged with considering options for including learning that does not lead to a qualification on national learning databases.

## **Botswana**

- 5.14. Botswana is currently in the advanced stages of introducing a full NQF. This will encompass the qualifications and qualification components registered, for example, on the Botswana National Vocational Qualifications Framework administered by the Botswana Training Authority (BoTA) now being taken into the new Botswana Qualifications Authority, It is likely that quality assurance mechanisms such as provider registration and course accreditation will also be taken into the Botswana Qualifications Authority.
- 5.15. BoTA has, for some years, been accrediting short courses. These are mainly being submitted by consultants rather than training providers and are usually not aligned with BNVQF awards or qualifications. Because of this, BoTA has not given much attention to quality assuring any assessments arising from these short courses – nor have they been demanding credit reporting (as the courses are not aligned to credit bearing awards). This omission seriously limits any credit accumulation and transfers for the learners taking the short courses. Thus, the recognition given to the short courses has little value to the learners.
- 5.16. There are some thoughts being given to enhancing the quality assurance of short courses by treating them in much the same way as qualifications – there would need to be clear expressions of the outcomes of learning associated with each short course. Attention could also be given to determining an alignment of the course’s scope with the Levels Descriptors of the qualification system. There could also be a determination of a comparable Credit value, using the notional learning hour system. These processes could be enhanced through any obvious relationships with registered qualification components or standards.
- 5.17. Because of the ‘light approach’ being given to the provision of short courses suspicions exist that any recognition of short courses is being subjected to abuses. Short courses are submitted to gain recognition merely to access funds from the Vocational Training Levy rather than to build skills and assist credit accumulation for learners and for industry.

Accessing funding seems to have a greater attraction than to align training with national and industry training needs and standards.

## **Mauritius**

5.18. The Mauritius Qualifications Authority has set standards for:

- the registration of training institutions offering any training (the requirements are very similar to the Registration requirements of the NTA)
- the registration of any trainer used by a training institution
- the registration of centre managers/programme officers
- the approval of non-award courses
- the accreditation of award-related programmes.

5.19. The standards (requirements and criteria) for approval of non-award courses are not as comprehensive as for award-related programmes. Principally, the provider of a non-award course needs to provide substantiating evidence that:

- the course is needed and has relevance – there are clear, measurable aims, goals and objectives
- planned provision steps will achieve the stated aims
- the course is appropriate to specified target participants
- specified resources are needed and are available
- sufficient, registered trainers are available
- appropriate facilities and equipment is available
- the effectiveness of the training will be subjected to evaluation
- certificates of attendance will be issued in accordance with stated attendance requirements.

5.20. There are additional specifications to be met if the course is intended to be offered by way of distance or e-learning modes.

5.21. Though the courses do not relate to recognised awards, there is a requirement that clear outcomes of learning are specified. This requirement is intended to contribute towards recognition through RPL processes.

5.22. The requirements for award-related programmes are very similar to the Accreditation Standards applicable in Namibia. Additional to the scope of requirements for approval of courses, providers of award-related programmes are required to detail:

- learner support provisions
- financial management practices
- quality assurance systems and processes
- assessment and moderation practices.

## **Malaysia**

- 5.23. Formal recognition of short courses in Malaysia is generally restricted to those for which assessed skills can be related to qualifications, competency standards, and competency Levels associated with the Malaysian Qualifications Framework. There is a requirement for the specification of learning outcomes and learning effort for courses for which formal recognition is sought.
- 5.24. The Malaysian Qualifications Agency, set up in 2007, assumed many of the powers and functions of the former National Accreditation Board. It conducts an accreditation system to verify that any certificate, diploma or degree programme complies with the standards and criteria set by the MQA for the Malaysian Qualifications Register and with the requirements of the Malaysian Qualifications Framework. Accreditation by the MQA is a statement to learners, parents and employers that a specific course has been quality assured. This accreditation is also the basis upon which other parties (such as the Public Service Department, Ministry of Immigration, professional bodies, etc) can give recognition arising to or from participation and successful completion of the courses on offer.
- 5.25. The Malaysian Qualifications Framework makes provision for the issuance of Skills Certificates at the bottom three levels of the eight-level system. These Certificates recognised attainment of capabilities in task or work-based activities and usually represent “manual” skills. The specification for these Skills Certificates falls within the jurisdiction of the Ministry of Human Resources. The criteria and standards applicable are usually found in National Occupational Skills Standards. There is, perhaps, some comparability of this system with the capability under the NQF of Namibia to issue ‘certification’ for separate unit standards – and that these can be accumulated or contribute towards qualifications at semi-skilled to supervisory levels.
- 5.26. Accreditation of programmes by the MQA also enables:
- students to apply for a loan from funding agencies such as the National Higher Education Fund (PTPTN)

- students to continue their studies in higher education institutions and obtain credit transfer. However, the final decision lies with the institution concerned.
- students to be considered for employment in the public sector. In many cases, even private sector employers consider accredited programmes in their selection of graduates for employment
- institutions to franchise their accredited programmes to other institutions, subject to certain conditions.

## **Australia**

- 5.27. The formal education and training systems of Australia are very similar to those of South Africa (as explained above) and New Zealand (as below). In general, only credit bearing or credit aligned courses are formerly recognised by national education, training and quality assurance agencies.
- 5.28. Nationally recognised courses for vocational education and training may only be offered by Registered Training Organisations. Such courses are the only ones eligible for State and Federal Funding.
- 5.29. In higher education, institutions are granted self-accrediting status. This grant is based on there being proven and appropriate quality assurance processes governing the provision of all courses and the award of recognised qualifications.
- 5.30. The Australian education and training systems does, however, offer some insights into the recognition of short courses by industry bodies for professional practices and/or professional development purposes.
- 5.31. It is not uncommon for industry bodies to set and maintain their own standards for the delivery of short courses. The courses are often quite varied in terms of their duration and delivery methods. However, they are required to be of a nature that:
- will enhance professional skills and knowledge in a specific field, and/or
  - align with the requirements of any applicable professional development points systems.

Thus, in some cases, the short courses could be based on identified units of study from an award-related course. They can also be limited-duration learning events such as a conference or seminar.

5.32. Suitability of a course or learning event is usually based on such things as:

- content and structural alignment with key knowledge and skills areas identified as essential to the profession
- alignment of content with relevant industry standards, codes and regulations
- the input into or control over content and delivery methods that the professional body is able to exert
- the credentials of the persons offering the course or sessions at the learning event
- the quality of the resources used or provided
- admission/entry requirements and vetting
- assessment practices (where these are applicable).

### **New Zealand**

5.33. New Zealand's Qualifications Authority (NZQA) and NQF were models closely studied in the late 1990's towards the development of the Namibian qualifications system. Being one of the earlier NQF systems, it is not surprising that there have been some changes in the New Zealand system. However, fundamental structures, similar to those of Namibia, remain.

5.34. Currently the NZQA has a number of recognition categories for courses and programmes. For example:

- programme approval<sup>10</sup> – courses of study or training that lead to qualifications listed at Levels 1 to 6 and diplomas registered at level 7 on the NZQF. The approval is a formal confirmation that the programme is aligned with the qualification outcomes and is based on clear and consistent aims, content and assessment practices. Such programmes may only be offered by accredited providers<sup>11</sup>.
- programmes leading to or related to qualifications at Levels 7-10 of the NZQF

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<sup>10</sup> There are separate (but perhaps concurrent) process and criteria for programme approval and provider accreditation. Private providers must also be registered. To retain registration, at least one approved programme or training scheme must be provided each year.

<sup>11</sup> Accreditation is a formal confirmation by the NZQA that a provider is capable of delivering an approved programme. If the programme is linked to registered unit standards, the provider must obtain a Consent to Assess – confirmation that is capable of assessing against unit standards – prior to seeking accreditation and programme approval

- training scheme approval – such schemes lead to an award but not, of itself, to a qualification listed on the NZQF
- industry training programmes – developed by Industry Training Organisations and that lead to a qualification listed on the NZQF
- programmes leading to professional registration (such as teacher registration, nursing registration and social worker registration) – in which there is close quality assurance cooperation between the NZQA and the relevant registration authority
- programmes for international students – these are generally not be linked to NZQF qualifications.

5.35. Thus, formalised quality assurance and recognition in New Zealand is essentially given only to credit bearing or potentially credit bearing courses and programmes.

5.36. In higher education (generally overseen by the Tertiary Education Commission) the approval of short courses (less than 40 NQF Credits) is conferred by Academic Boards upon the consideration of submissions by faculty Academic Committees. In many cases, such approval relates to all short courses whether funded by government, Industry Training Organisations or ‘entrepreneurial’ courses (ie, cost recovery courses). The courses can be assessed (they have stated clear and transparent outcomes of learning) or non-assessed. Providers determine their own rules regarding the type of certification that can be issued. For example, attendance certificates can be given only for non-assessed short courses and, perhaps, where a significant attendance ratio has been sustained (eg 80%).

5.37. Short courses are usually required to be reviewed on a regular basis, often on the basis of student feedback. Departments within the provider are often required to formally report on all short courses annually to the respective Faculty Academic Committee.

5.38. The Tertiary Education Commission (TEC) stipulates specific requirements for any short courses that are government funded – that are Adult and Community Education-related. These courses must be developed in consultation with the community and must articulate with priorities stipulated by the TEC. Such priorities include courses that:

- target learners whose initial learning was not successful
- raise the level of foundation skills
- encourage lifelong learning
- strengthen communities
- strengthen social cohesion.

## United Kingdom

- 5.39. Education and training in the United Kingdom is conducted under a number of qualifications frameworks and quality assurance bodies. Despite this, there is a high level of comparability between the systems and requirements, principally because of the high degree of mobility of people within the UK and the European Union.
- 5.40. Formal recognition in higher, vocational and general education is overseen by recognised national bodies and authorities. For example, higher education providers and institutions fall within the oversight of the Quality Assurance Agency (QAA). Standards for courses and for delivery of them are signalled in a Quality Code for Higher Education – a definitive reference that provides a start point for the establishment and maintenance of quality. Providers are also required to meet the requirements of relevant legislation, particularly in relation to funding.
- 5.41. Providers are responsible for ensuring that learning outcomes for their programmes align with the relevant qualification descriptors in the national frameworks for higher education qualifications. They are responsible for defining clear academic standards – pass marks, grading/marking schemes and criteria.
- 5.42. Degree-awarding bodies often have other non-awarding providers offer course components that lead to the award of higher qualifications or academic credit. In such cases, the degree-awarding body is responsible for setting required standards and for ensuring that standards are met and maintained. The obligations of the partner-provider are specified in written agreements for each, specific arrangement.
- 5.43. Degree awarding bodies will have documented requirements and processes relating to the provision of short courses that are or are not credit bearing. For credit bearing courses or modules developed for continuing professional development opportunities, assessment practices and requirements approved by the institution apply. It is common practice that learners completing credit-bearing short courses will not be deemed to be matriculants. There may also be limitations on their entry into other programmes because of completion of a credit-bearing short course. Completion may, however, be used in recognition of prior learning applications.
- 5.44. Non-credit bearing courses are usually treated with a lighter-touch process. Rather than formal academic standards and processes being applied, approval of non-credit bearing short courses is often left to decisions being made by the Head of the School offering the course. Such decisions are, however, guided by requirements such as:

- the clarity of aims, objectives and learning outcomes and the alignment of course contents with these
- assessment practices (where used) being appropriate and relevant to the learning outcomes
- appropriateness of duration and pedagogical approaches
- the nature and status of any certification and how this will be managed
- systems being in place to ensure that quality is assured and enhanced.

Where provision of non-credit bearing courses could pose reputational risks to the institution, quality assurance processes applicable to credit-bearing courses would normally be applied.

5.45. Professional, statutory and regulatory bodies set standards for and regulate entry into professions. They also set standards and quality requirements for professional development and the retention of permissions to practice.

5.46. Ofqual is the regulator of qualifications other than degrees in England and Northern Ireland. It works in close collaboration with governmental agencies in Wales and Scotland. It has specific responsibilities for recognition of awarding organisations that award recognised qualifications. Ofqual believes that the market alone cannot be relied upon to ensure that standards for comparable qualifications and awards are consistent, that learners are treated fairly, and that training fees represent value for money. Its work is based on the premise that independent assurance of quality is essential for the establishment of trust in education and training. Its General Conditions of Recognition are closely aligned with registration and accreditation requirements administered by most national quality assurance bodies.

## 6. Regulatory landscape in Namibia relevant to the recognition of short courses

### Powers of the Namibia Qualifications Authority

6.1. The Namibia Qualifications Authority was established through Act 29 of 1996. Section 3 of the Act lists the specific objects of the Authority. Amongst these is to *accredit persons, institutions and organisations providing education and courses of instruction or training of meeting certain requirements.*

6.2. These “certain requirements” are outlined in Section 13 of the Act – principally that:

- the person, institution or organisation has the capacity to provide a course or courses of instruction or training and to assess the performance of persons partaking in any such course
- a course of instruction or training provided by the person, institution or organisation that meets the occupational standards<sup>12</sup> or curriculum standards<sup>13</sup> of the NQA for such a course.

The wording of Section 3 suggests that the NQA is able to accredit the provider or the course.

Section 13 and the definitions provided in the Act do not give any specifications as to the duration of the course able to be accredited. Further, Section 13 and the definitions do not indicate that the course must lead to a qualification or award.

6.3. Section 13 of the Act is given further elaboration in the Accreditation Regulations of 2006. Section 2 of the Regulations states that applicants shall seek accreditation for a course or courses. There seems to be no specifications relating to the duration of a course able to be accredited in the Regulations. Though there are references to the NQF there is no specification that a course must lead to a NQF qualification or award to be eligible to be granted accreditation status.

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<sup>12</sup> Defined in the Act as “a statement by the NQA describing the competencies required to fulfil the duties of an occupation, job, post, or position, and the criteria to be used to determine that such competencies have been achieved. Annexure H of the NQF Regulations makes the suggestion that, with the advent of the NQF in 2006, ‘occupational standards’ might be interpreted as being either unit standards and/or national qualifications.

<sup>13</sup> Defined in the Act as being a description of the course of study leading to a qualification. As the Act preceded the NQF Regulations, it does not refer to a NQF qualification or award. Section 3 of the NQF Regulations states the types of qualifications or awards able to be recognized on the NQF.

- 6.4. The Accreditation Regulations include reference the term *education services* as being related to the number of courses covered by an accreditation. The term is defined in the Regulations as being “the provision of structured teaching or learning programmes linked to accredited courses or the provision of assessments and the making of assessment decisions related to such courses” (emphasis added).
- 6.5. Annexure B of the Accreditation Regulations sets down the Requirements and Criteria to be met for the Grant of Accreditation. These are the things with respect to the standards of delivery of a course or courses and the assessment of the performance of people taking a course or courses that the NQA needs to be assured of. Annexure B is commonly referred to as the *Accreditation Standard*.
- 6.6. Element 2.2 of the Accreditation Standard refers to requirements and criteria for course design and documentation. There is a clear expectation in 2.2 (1) that processes applied will lead to the design of a course that:
- addresses substantiated national, regional or local economic, social, cultural and/or technological needs
  - specifies standards to be achieved and that aligns with international standards
  - expresses a profile of learning outcomes
  - has an appropriate pedagogical approach
  - is well resourced
  - is well structured
  - is inclusive of assessment
  - is inclusive of review and evaluation
  - represents a clear and effective synergy between the course provider and potential future ‘employers’ of any graduates and other relevant stakeholders.
- 6.7. Element 2.2 (2) states the expectations of the descriptions or statements given for any course. The descriptions and statements must be inclusive of:
- a clear rationale
  - the outcomes of learning to be achieved
  - the performance standards to be attained
  - entry requirements
  - mode, sequence and weighting of teaching and learning methodologies
  - the composition of the course in terms of modules or significant learning activities
  - key resources required

- assessment methodologies to be used and the weightings if a mix is to be applied
- statements of learner progressions
- evaluation sources and methods.

The statements must be sufficient to enable prospective learners to make informed decisions on the suitability of the course for their personal goals and needs. Thus, any information provided (inclusive of fees) must be comprehensive and not be misleading.

- 6.8. Element 2.2 (2) (d) states that information in course statements must “not be inconsistent with structural features or contents of the NQF”. This is, perhaps, quite a significant criterion. It appears to imply that accredited courses can relate to NQF qualifications and awards, parts of NQF qualifications or awards, or can be aligned with structural features such as NQF Levels, NQF Credits and/or NQF Subject Classifications.
- 6.9. It appears, therefore, that the Accreditation provisions administered by the NQA refer to any course, regardless of duration, where there is an expectation that required abilities (outcomes of learning) are developed and attainment proven and reported through assessment. It would seem that the provisions do not apply to courses where recognition of participation or engagement by the learner is not reported in any way other than through mere attendance.
- 6.10. Element 2.8 of the Accreditation Standard refers to assessment of learner performance. It is required, under this Element, that there are assessment plans and associated instruments (tests, marking schemes, etc) for all courses for which accreditation is sought.
- 6.11. Element 2.9 refers to learner records and reporting. There is a requirement that all information about a learner and their attendance and behaviour is “sufficient to serve the interests of the learner in case of any voluntary or forced transfer to another provider”.

## **Powers of the Namibia Training Authority**

- 6.12. The Namibia Training Authority (NTA) was established through Act 1 of 2008. This Act was intended to enable, amongst other things, the regulation of the provision of vocational education and training in Namibia<sup>14</sup>. The Act also makes provision for the implementation of a vocational education and training levy.
- 6.13. Section 5 of the Act sets out powers and functions of the NTA. In subsection 3, the NTA is potentially able, subject to the policies and procedures determined by the Namibia Qualifications Authority, to (amongst others):
- set occupational standards, curriculum standards and qualifications for vocational education and training
  - accredit education and training providers and programmes
  - register assessors and conduct assessments
  - conduct quality audits
  - issue awards and certificates.
- 6.14. Section 47 of the Act permits the NTA to offer advice to the Minister of Education in the making of regulations of relevance to vocational education and training. It is pursuant to this Section that the Minister, in 2012, issued Regulations for the Registration of Vocational Education and Training Providers. These Regulations apply to all providers offering vocational education and training programmes to learners. There is no reference in the regulations to any durational parameters for the programmes. Section 3 (3) does require, however, that assessment policies and procedures must be applied within any programme.
- 6.15. The Regulations imply (eg, through Section 19 and Section 20) that Registration of the provider includes the Registration of any programme(s). The programmes must<sup>15</sup> align with qualifications and/or unit standards and must result (Section 21) in the issue of a mark, grade or outcome to the learner.
- 6.16. Section 22 (3) states that any registered provider must specifically state if any programme offered does not lead to a national qualification in any advertising or marketing materials. This is intended to heighten transparency for intending learners.

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<sup>14</sup> The Act defines this as any education or training that provides learners with occupational or work related knowledge and skills, except those related to the Defence Force and the Police Force.

<sup>15</sup> “Must” is currently being read as “preferably” so as to widen the initial interest in and take-up of the VET Levy (see 5.20)

- 6.17. Section 11 of the Regulations states that registered providers must, as soon as possible after becoming registered, submit a complete application for accreditation in accordance with applicable regulations. If this is not done, the registered provider must make an application for an extension of their registration. This application to the Board of the NTA must provide evidence that they are or have been in the process of applying for accreditation or provide motivation as to why the application for accreditation has not been made. Upon consideration of the application for an extension of registration, the Board may grant an extension for a specified period.
- 6.18. Section 11 (6) of the Regulations states that providers offering programmes that are not credit bearing towards NQF qualifications or awards must apply for re-registration every two years. Where programmes not linked to national training programmes or NQF awards are offered, there must be documented proof (Annexure 1B) that stakeholders have given support for the proposed services. Relevant stakeholders must also have been consulted in the development of any course statements and training materials. Furthermore, there must be a reliable way in place for proving that the intended outcomes or intended results of the programme have been achieved. Ideally, this should be an assessment process as required in the Criteria for Registration.
- 6.19. Thus the registration by the NTA of providers and their stated programmes is applicable to both credit-bearing and non-credit bearing programmes. If credit bearing, there is a stated expectation that accreditation of the programme is sought. If non-credit bearing, Annexure 1B suggests that appropriate and robust assessment of learner performance and moderation of attainments (or an alternative, appropriate means of measuring the success of the course) must, nevertheless, be in place.
- 6.20. Regulations for the use of the Vocational Education and Training Levy administered by the NTA were issued in 2014. In the Regulations, training able to be refunded to employers from the Levy is defined as training *related to vocational training provided by a private vocational training provider<sup>16</sup> accredited by the Namibia Qualifications Authority or a state owned vocational training centre*. A significant area of current challenge for the NTA is the ongoing populating of the NQF with vocational qualifications and awards. As many skills areas are not yet covered within the NQF, the NTA is presently taking a broad view as to what could constitute ‘refundable’ training. In essence, it principally looks at training related to NQF

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<sup>16</sup> The Vocational Education and Training Act of 2008 speaks of *vocational education and training providers* without distinguishing between private and state owned providers. The omission of the word ‘education’ with reference to providers may not be of significance. The Regulations for Registration of VET Providers also does not distinguish between private and state owned – and is inclusive of the term ‘education’.

qualifications and awards, courses offered by currently accredited and/or registered providers, and training programmes available through the Sector Education and Training Agencies (SETAs) in South Africa.

- 6.21. Advice given by the NTA to employers on their eligibility to claim training grants from the VET Levy indicates that they, if they themselves provide the training, should seek accreditation from the NQA.

### **Powers of the National Council for Higher Education**

- 6.22. The National Council for Higher Education (NCHE) was established by the Higher Education Act (Act No 26 of 2003). The Act's intent for the NCHE was the promotion of a co-ordinated higher education system for Namibia, promoting access to higher education institutions, and promoting quality assurance in higher education. With regards to quality assurance, the NCHE is able to offer advice to the Minister of Education at its own initiative or upon request.
- 6.23. One of the functions of the NCHE<sup>17</sup>, as stated in Section 6, was that the NCHE must accredit, with the concurrence of the NQA, programmes of higher education provided at higher education institutions (both private, as registered under the Act, and public, as established by or under any law). The NCHE has defined a programme as *a purposeful and coherent combination of learning experiences that lead to a qualification*<sup>18</sup>. Programme accreditation is applicable to programmes offered abroad by Namibian institutions and to programmes offered by foreign providers in Namibia, even if quality assured in the country of origin.
- 6.24. Key to the quality assurance processes prompted by the NCHE is the principle that the higher education institutions themselves are the main custodians of quality and, therefore, have the primary responsibility for the quality of their programmes and the assurance of the quality of these. There is a clear expectation that quality is internationally benchmarked so as to benefit students and other beneficiaries of the higher education system. Programme accreditation is aimed at safeguarding the quality of academic programmes offered in Namibia and at facilitating the employability of the graduates.

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<sup>17</sup> The Higher Education Act of 2003 is currently under review.

<sup>18</sup> Discussions with staff of the NCHE indicated that recognition of courses that are not directly linked to registered qualifications would likely be considered by the NCHE. Such recognition would, however, have implications for the number of quality assurance staff required by the organization.

- 6.25. For any programme to gain or retain accreditation status, there must be clear expressions of relevant and internationally benchmarked outcomes of learning. The attainment of these must be proven through appropriate modes of assessment implemented by qualified and experienced staff, and that have been subject to moderation.
- 6.26. The quality of “short courses” (any course of less than 40 NQF Credits) does not fall within the NCHEs programme accreditation activities. Institutions are required to establish internal mechanisms for ensuring the quality of such courses<sup>19</sup>. The NCHE will principally monitor the efficiency of these internal systems through the process of institutional audits<sup>20</sup>.
- 6.27. Any professional programmes offered must meet the requirements of relevant statutory councils<sup>21</sup> before they can be offered.
- 6.28. A significant challenge to the NCHE (and also the NTA) rests in identifying what courses and institutions fit within the ambit of ‘higher education’. NQF Level 5 has been identified as a useful delineation point – but it is acknowledged that courses relevant to vocational education (or further education and training) could also be beyond this NQF Level. Thus, recognition of courses that is inclusive of the need for statements of alignments with NQF Levels and NQF Credits would likely assist in deciding under which quality assurance regime a provider would fit<sup>22</sup>.
- 6.29. The NCHE also faces challenges with respect to the recognition of courses developed from outside of Namibia. Many do not have clearly identified relationships with, for example, NQF Levels or Credit systems. If short courses, they are often (see section 5 of this Paper) not quality assured by an external authority.
- 6.30. The NCHE also has responsibility for the registration of private higher education institutions. The focus of registration is to gain assurances of the qualities of the institution – that it will likely have the means to provide good services for a considerable time period. Programme accreditation processes principally focus on the qualities of the courses offered by the institution.

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<sup>19</sup> The Polytechnic of Namibia has, for example, approved policies and procedures for the development and approval of short (less than 400 hours and/or not listed as a programme or qualification in the Prospectus) and Industry Credentialised courses and qualifications. The policies draw upon best practice examples drawn from higher education quality assurance bodies and from other institutions. The policies are, therefore, closely aligned with examples referred to in Section 5.

<sup>20</sup> The NCHE has not, to date, conducted any institutional audits. It has started, albeit on a small scale, programme accreditations.

<sup>21</sup> Such as the Health Professions Council and Engineering Council

<sup>22</sup> Having a NQF made up of sub-frameworks has also been identified as a mechanism for placing providers and courses under the most appropriate quality assurance regime.

## 7. A quality assurance challenge of significance

- 7.1. In a number of cases, a request for the provision of a short course is made by an employing body. Their request is often made with some urgency attached – there is an organisational need that is required to be addressed with urgency. Accreditation and Registration of Provider processes can, however, be quite lengthy. In Namibia, the current processing times<sup>23</sup> would likely be completed some period of time after the course was required to be delivered.
- 7.2. As a consequence, formal recognition of short courses by way of quality assurance processes may only be granted after the course had been offered and completed. Learners going into such courses would not have any guarantees as to the transferable value of participating (and being successful) in the course.
- 7.3. The NQF Regulations in Namibia allow (in Annexure C) for a Scope of Accreditation to be expressed in broad terms rather than as specific courses. The suggested method of broad expression is to make use of the NQF Classification and NQF Level systems. For example, a provider could apply for accreditation to offer courses relevant to a Subfield of the NQF up to stated NQF Level. The intent was to limit the need for continual applications for an Expansion of Accreditation. It could also be an appropriate mechanism to enhance the responsiveness of a provider in providing short courses requested with short timeframes. In some respects, this is a mechanism very similar to the ‘self-accrediting’ delegations commonly given to higher education institutions. The risks associated with self-accrediting delegations (particularly those associated with the misleading of learners) may also arise.
- 7.4. In granting accreditations with a broadly expressed Scope of Accreditation, the NQA (or one of its partners) would have to be assured that processes for the development of new courses (as required in Element 2.2 (1) of the Accreditation Standard) were of an acceptable standard – and that they had been applied. The latter would likely be tested during any Re-accreditation activity (currently not more than every three years). A limitation of this, however, would be the currency of any verification of any alignment with an NQF qualification or award, or the validity of any claimed alignments with the NQF Levels and NQF Credit systems. Learners may also not accept any statements made by the provider that the course was, indeed, formally recognised as it would not, transparently, appear on the listings in the Scope of Accreditation for that provider.

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<sup>23</sup> The exception could be in the case of higher education, particularly with public institutions, where approval of short courses is principally addressed through delegated authority.

- 8.1. Providers that offer non-credit bearing or related courses could be given an alternate status to that of being Registered or Accredited. For example, they could be referred to as *approved providers* or *recognized providers*. Their non-aligned short courses could also be referred to as *approved*<sup>24</sup>. However, care must be taken that any term does not convey a meaning that is not intended. Care must also be taken that any term used is not also used in association with other education and training practices. Adding more complexity into the current systems is, perhaps, something to be avoided.
- 8.2. Staff of the NQA have indicated that, in their experiences, requests for the recognition of short courses is not an avoidance of accreditation processes. They also observe that many of the enquiries for recognition come from RSA providers that do not have access to formal recognition in that country.
- 8.3. Some learners undertaking these courses also submit certificates (mainly of attendance) to the NQA for Evaluation. The lack of quality assured status of the course precludes any detailed evaluation statement by the NQA under the current Evaluation Regulations.
- 8.4. It is, therefore, recommended that Recognition and/or Accreditation processes and nomenclature for short courses and the providers of short courses be kept as consistent as possible with processes applicable to providers and courses leading to qualifications or NQF awards. There is a risk that divergent and multiple models will lead to confusion amongst learners, employers and the public at large. Of greater concern is the potential for learners, employers and the public at large to be misled as to the status of a short course and the provider.
- 8.5. It is a recommendation from this project that the quality assurance of providers of credit bearing or credit aligned short courses and the short courses themselves remain closely aligned with the current processes and criteria applicable to provider registration and course and delivery accreditation where learning is oriented towards full or partial NQF qualifications.
- 8.6. There is also a potential for confusions to arise should a national register of non-credit bearing or aligned courses be held by the NTA, NQA or NCHE. In this case, the confusion will centre on the difference between a recognised course and a recognised qualification or award. Thus, it is not recommended that a Register of Short Courses be kept other than those short courses that are ‘accredited’ as listed on the respective Scope of Accreditation certificates.
- 8.7. There will always be providers of and courses that are not credit bearing or that cannot be credit-aligned. However, given the lack of stated outcomes of learning and

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<sup>24</sup> They could not be termed *recognised* as the absence of stated outcomes of learning and/or robust and quality assured assessment essentially means that there is nothing except attendance that could be ‘recognised’.

systems to prove that learning has been acquired to appropriate standards, there does not seem to be compelling reasons to excessively regulate the courses and the provision of them. This is not, however, to say that such courses are not to be of quality in terms of design and delivery. It is highly desirable that ‘Good Practice Principles and Guidelines’ for non-credit bearing courses be developed in an endeavour to prompt quality of learning in such courses.

- 8.8. It would appear that such learning would continue to take place under personal agreements between the learners and the providers. It would also mean that the learning and the transactions would continue to have little or no status in terms of entry into or progressions along formal learning pathways or the ‘public’ funding of them.

## 9. Proposals

The following proposals are made following the research and interactions undertaken as part of this project.

9.1. The following definition of short courses shall apply in Namibia:

A short course in Namibia is *any activity involving teaching and learning that requires less than 400 hours of learner effort*<sup>25</sup>.

9.2. Though the focus on duration of any training course is largely unhelpful in terms of any demands for recognition of short courses, the term *short courses* is global and accepted. Thus, it is not useful for new nomenclature to be developed in Namibia. There is, however, a need to identify Namibian interpretations of the nature of courses covered by the term. A differentiation between types of courses is to enable the application of different and appropriate quality assurance processes that will give a recognised status to the learning from the courses. Such recognition is desirable so as to optimise, particularly for learners, the value and acceptance of the learning derived from their participation in short courses.

9.3. The purpose of learning from a course can be quite varied. Courses could, for example, be intended to:

- build general education abilities
- build vocational abilities
- contribute to advanced academic abilities
- contribute to professional competence and practice abilities
- assist career advancement
- accommodate responsiveness to market, process, technological, and/or product developments
- assist the advancement of socio-political actions or goals
- satisfy personal interests.

9.4. In each case, stakeholders will have their own interests in the value of the course. As stakeholders, they are the ones who will give ultimate recognition as to the value of any course. They must be involved, meaningfully, in the design of the course in terms of content, pedagogical approach and mode of delivery. They should also be involved

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<sup>25</sup> Learner (or learning) effort reflects just that – the commitment of the learner rather than the provider of the course. It is the engagement of the learner in any teaching, their direct and indirect learning (including practice), and any involvement in summative and/or formative assessment.

in the evaluation of the effectiveness of the course and its delivery in order that future versions of the course are of an enhanced quality.

- 9.5. Not all learning, however, must lead to the award of a qualification for it to be valuable. Not all learning must be highly regulated. There should be a balanced application of quality assurance for short courses. Regulation is principally needed where learning leads to or is closely aligned with a registered qualification, a unit standard or otherwise to the NQF in order to consolidate the credibility and transferability of the learning. Regulation is not needed in the same intensity for courses that are not intended to be directly linked or closely aligned to the NQF.
- 9.6. Short courses in Namibia shall, therefore, be differentiated as fitting within two categories:
- those that are *credit bearing* in that they have a relationship to the National Qualifications Framework (NQF) of Namibia, or
  - those that are *non-credit bearing* in that they fall outside the intended scope and purpose of the NQF of Namibia.

### **Credit-bearing short courses**

- 9.7. Three clear types of credit bearing short courses can be readily identified:

- a) those that have a **direct relationship** with the NQF

Short courses in this category lead to the award of:

- i) NQF Credits for specific unit standards registered on the NQF, (for example, the Assessor unit standards 336 or 337)
- ii) Components (modules) of registered, partial (whole) qualifications by way of formal recording on the relevant institution's transcripts of learning.

Courses, and the providers of such courses, are currently required to be accredited by way of the Accreditation Regulations of 2006 (Government Notice 124) and/or the programme accreditation provisions of *Quality Assurance System for Higher Education in Namibia* (NCHE 2009).

It is proposed that short courses in this sub-category continue to be subject to these quality assurance requirements.

b) those that have a **close relationship** with the NQF

Short courses in this category are significantly based on NQF-registered unit standards or to components of NQF-registered portal qualifications. However, though substantially based, they do not result in the award of NQF Credits or formal listing on the relevant institution's transcript of learning. Short courses in this category have a high emphasis placed on learner attainment and summative assessment is a key component.

Some courses may be based on some of the Elements, a substantial number of the Performance Criteria, or a significant portion of the Range Statements of registered unit standards. However, because of the industry-specific performance context expressed in the unit standard, the NQF Credits for the relevant unit standard cannot be awarded. The courses would typically have an orientation to generic competencies such as, for example:

- Customer Service
- Health and Safety
- Office Procedure.

In higher education, formalised components of NQF-registered qualifications can be inclusive of key learning areas that can be isolated from the 'parent' course or programme. For example, a Business Development course could be inclusive of such topics as 'Entrepreneurship' or 'Writing Business Plans'. These topics could, perhaps, be taught separately by the institution as short courses, using the same resources and pedagogical approaches.

It is proposed that short courses in this sub-category be covered by the provisions of the Accreditation Regulations of 2006 if the relationship is to a whole qualification registered at or below NQF Level 5<sup>26</sup> or a registered unit standard.

If the relationship is to a whole qualification registered at or above NQF Level 6, the Programme Accreditation provisions overseen by the NCHE would apply.

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<sup>26</sup> For the purposes of this Paper, NQF Level 5 has been used for convenience to distinguish between 'vocational' courses and 'higher education' courses. It is acknowledged that this distinction is not found in any related regulations. Furthermore, it is acknowledged that differentiation between the two sectors at or around NQF Level 5 is not appropriate in all subject areas.

- c) those that can be **readily aligned** to the NQF

Short courses in this sub-category have clearly identifiable and expressible outcomes of learning (competencies) which are verified as being attained by learners through robust summative assessment. These learning outcomes are, however, not recorded as or listed in NQF unit standards or components of NQF-registered portal qualifications<sup>27</sup>.

Because of the clear existence of expressible outcomes of learning, an alignment with the broad, generic outcome statements of the NQF Level Descriptors is able to be determined. The quantum of learner effort towards the attainment of the outcomes of learning can also be expressed in terms of NQF Credits. Such alignment and expression may be of significance for learners in the acceptance by employers of learning listed as short courses in curriculum vitae (CV's), or acceptance by provider institutions in terms of recognition of prior learning in advanced placement and/or mature-age entry systems.

- 9.8. Because of the potential for meaningful transferability and recognition of learning (using the NQF Levels and Credits systems) there is a need for high levels of credibility to be assigned to the learning and attainment. Thus, it is recommended that accreditation be required in terms of the Accreditation Regulations of 2006 for outcomes of learning at or below NQF Level 5 or the Programme Accreditation provisions overseen by the NCHE if the learning outcomes are at or above NQF Level 6.
- 9.9. Where the credit-bearing short courses are clearly vocationally oriented (essentially at or below NQF Level 5), the provider of the short course must also be registered under the provisions of the Registration of Vocational Provider Regulations (Govt Notice 300 of 2012). There will be a clear expectation that accreditation be actively and appropriately pursued for such courses as per Section 11 of the Regulations. Furthermore, the provisions of Section 11 (6) whereby providers may seek re-registration after a period of two years will not be applicable to any credit-bearing short course.
- 9.10. Because of the need for verification of any claimed alignment with the NQF, the Qualifications Section of the NQA must be involved prior to any accreditation or provider registration decision. Such involvement could be initiated by the NTA upon the receipt and processing of an application for registration from a provider wishing to offer credit-bearing short courses.

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<sup>27</sup> The NQF of Namibia is still developing – in fact, the review of qualifications and developments in learning will likely mean it is never ‘completed’. Some key learning outcomes and learning areas are not yet registered as unit standards or whole qualifications but there is a strong likelihood that this will happen. Thus, there may be some fluidity in the categorisation of short courses within this credit bearing grouping and, perhaps, from the non-credit bearing groupings.

- 9.11. In addition to the proposals outlined in 9.7 - 9.9 above (and/or as an alternative to the proposals) the NQA should investigate the desirability and feasibility of restricting the provision of credit-bearing short courses to providers who have an existing accreditation, albeit expressed in a more broad manner rather than for named courses. That is, a provider could seek accreditation for a named subject area (perhaps linked to the NQF Classification System) up to a stated NQF Level. Such an accreditation could give the accredited provider the means to offer credit-bearing courses within this scope without submitting each course through an Expansion of Accreditation application<sup>28</sup>. This process would, to some degree, reflect the current situation applicable to higher education institutions.
- 9.12. Credit-bearing short courses accredited because they are closely related or readily aligned with the NQF of Namibia and that have robust summative assessment components will not be registered on the NQF. The NQF shall remain solely a framework for quality assured qualifications and awards (unit standards).
- 9.13. Providers of credit-bearing short courses from beyond the borders of Namibia must be recognised by the appropriate governance body in the country of origin (for example, one of the bodies responsible for a sub-framework of the NQF in South Africa).

### **Non-credit bearing short Courses**

- 9.14. Non-credit bearing short courses generally fall outside the ambit or intended scope of the NQF of Namibia<sup>29</sup>. This may be because:
- The attainment of any outcome of learning represents learning effort less than that associated with 1 NQF Credit (for example, at a seminar, colloquium, or one-day workshop).
  - The intended purpose of the short course was not aimed at the award of ‘credit’ because it was essentially for ‘personal enrichment’<sup>30</sup>. Consequently, there was no summative assessment.

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<sup>28</sup> There are significant matters that may need additional consideration. For example: claims of NQF Level and NQF Credit alignment would be unverified until, perhaps, the Re-accreditation processes that check that new courses were appropriately developed and resourced; the uncontrolled expansion of courses within an accredited provider could compromise the quality of provision of other courses; and it may be problematic for the provider to prove to learners or employers that a particular course was accredited as it would not be uniquely identifiable on a Scope of Accreditation Certificate.

<sup>29</sup> Such courses are sometimes referred to under a number of terms: ‘continuing education courses’; ‘adult learning courses’; ‘community outreach programmes’; ‘access programmes’; ‘capacity building programmes’; ‘corporate courses’; ‘extra-mural courses’; etc.

<sup>30</sup> It is acknowledged that a short course could be offered with a duality of purposes. Some people may take the course with the intention of deriving credit. Others may take it simply for personal enrichment. Where such a course has a duality of purposes it will be considered to be a credit-bearing short course.

- The course represented specialised learning to meet a particular purpose related to information sharing or updating (but not-for-credit). For example:
  - a Refresher Course for professionals
  - Briefings on changes to Regulations or Codes of Practice, etc.
- The course represented highly customised learning (but not-for-credit). For example:
  - Product/process/equipment-specific training (eg, training related to new beauty products, new vehicle parts, new computer programme application, etc)
  - Vendor-specific training (eg Microsoft, Oracle, Novell training, etc) – often ‘industry-credentialled’ to the extent that the industry and/or employer will give recognition or will give the learner employment.
  - Socio-political development (eg, training of Election officials, health promotion such as immunisation programmes, etc).

9.15. In general, courses associated with the above would be certificated by way of a Certificate of Attendance (or, in some cases, a Vendor-issued certificate). In general, there is no summative assessment applied to the people taking such short courses.

9.16. Because of this lack of summative assessment and clear intention of any learning not to be recognised in terms of any NQF-related award or any qualification articulation or credit transfer arrangements, it is recommended that such courses fall outside the regulatory processes associated with the NQF. This is not, however, to say that such courses are not to be of quality in terms of design and delivery. The intended provision of ‘Good Practice Principles and Guidelines’ for non-credit bearing courses is an endeavour by the quality assurance bodies in Namibia to prompt quality of learning in such courses. Annexure A provides an initial version of such Principles and Guidelines.

9.17. Because of the absence of independent quality assurance of non-credit bearing short courses, any short course provided or learning attained from it will not be sanctioned by way of formal recognition (such as through the Evaluation of Qualifications) by the Namibia Qualifications Authority. This is not, however, an assertion that such courses are ‘second rate’.

9.18. The 2013 Regulations for the Registration of Providers require that providers of vocational education and training courses that are not credit-bearing (ie, they fit one of the types listed above) must be covered by the provisions of the Registration Regulations. Section 11 (6) has particular significance as an application for re-registration is required every two years and must be granted by the NTA Board.

## Short Courses that benefit organisations rather than learners

9.19. The introduction of the VET Levy allows for vendor-specific or highly employer-customised training to be eligible for claims by employers against the Levy where there are clear benefits to the claiming organisation from conducting or having training conducted. Thus, rather than there being summative assessment of learner attainment, there could be an organisational gain in terms of such things as:

- Reduction in production costs
- Reductions in resource wastage
- Reductions in worker absenteeism because of improvements in worker attitudes or because of fewer injury-accidents
- Improvements in productivity rates
- Improvements in profitability
- Enhancement of market share
- etc.

9.20. Where a short course is utilised to achieve organisational rather than learner benefits, there should be a reliable way for proving that the intended results of the programme have been achieved – there should be some *assessment of impact* (as opposed to assessment of learner attainment). This possible assessment of impact should be carried out by the organisation benefiting from the training (rather than the provider of the short course).

9.21. In order for impact to be measured, there should be a valid benchmark(s) recorded that establishes the state of affairs before the training was undertaken. Periodic measurements after the training should be taken to determine the type(s) and magnitude of the impact for the organisation.

The system for measurement should be valid and could, perhaps, be audited by the NTA.

9.22. The current provisions of the VET Levy Regulations (Government Notice 5 of 2014), however, only requires evidence that training has been implemented in the manner required by the NTA. There is no specified requirement that proof of impact for the organisation must be provided<sup>31</sup>. There should, however, be a clear purpose for the provision of any training provided under the Levy system (see the provisions in the *Principles and Good Practice Guidelines* in Annexure A of this document).

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<sup>31</sup> Section 4 (3) (b) of the Regulations, however, does enable the NTA to require other documents, information or evidence. It is not proposed, at this stage, that an assessment of impact be made a requirement, principally as claims for training grants must be made for a specified calendar year – the impact of any training may not be evidenced within that year. Evidence of impact could, however, become a requirement where employers or providers make an application under the provisions of Section 5 of the Regulations pertaining to key priority grants.

9.23. In order to accommodate the demands of responsiveness and customisation with short courses that benefit organisations rather than learners, it is recommended that these ‘special cases’ not be subject to high levels of external quality assurance. Thus, accreditation of the provider would not be expected.

### **Professional short courses**

9.24. The provision and taking of profession-related short courses is commonly associated with rules and regulations regarding rights to continue professional practice and/or the meeting of continued professional development obligations. Such courses could be credit or non-credit bearing in nature.

9.25. Where professional practice and continued professional development is subject to regulatory provisions of a professional body recognised by law (or by other means by the Government of the Republic of Namibia) the provision and recognition of such professional short courses will not be subject to regulatory processes such as Accreditation or Provider Registration unless the relevant professional body requires such regulations to be complied with.

### **Accreditation decisions**

9.26. Accreditation decisions for credit-bearing short courses should continue to refer to named courses<sup>32</sup> and:

- a named Namibia NQF qualification or award, or
- a named qualification or award from another country, in terms of “as awarded by <name of approved awarding body>” or “as awarded by <name of Namibian provider> under the authorisation of <name of approved awarding body>”, or
- an alignment with a Namibia NQF Level and NQF Credit value.

9.27. Scope of Accreditation Certificates should state the name of the course and:

- a named Namibia NQF qualification or award, or
- a named qualification or award from another country, in terms of “as awarded by <name of approved awarding body>” or “as awarded by <name of Namibian provider> under the authorisation of <name of approved awarding body>”, or
- an alignment with a Namibia NQF Level and NQF Credit value.

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<sup>32</sup> Any outcomes from a more broadly scoped accreditation system (explained in 9.10) would have implications for the current practice of accreditation decisions of the NQA being linked to named courses.

## Certification of Short Courses

### *Credit-bearing short courses*

- 9.28. Certification of any credit-bearing short course should only be undertaken by a person, institution or organisation that has been duly accredited to do so by the relevant quality assurance body.
- 9.29. Any certification arising from short courses that are *directly* credit-bearing must comply with the general certification provisions stipulated in the Regulations pertaining to the National Qualifications Framework of Namibia. That is:

Qualification certificates should clearly and accurately state:

- the full name of the qualification (or award)
- the name of the person, inclusive of their date of birth and/or Identity Number, to whom the qualification (or Award) has been awarded, and
- the date of the award, and
  
- refer by name, seal (where applicable), and/or coding identifier to the awarding body (and any relevant quality assurance body), and
- display the signatures of relevant persons (from such bodies).

Qualification certificates must contain sufficient security features to minimise unauthorised duplication and/or aid the identification of false copies of the certificate.

Security features would include such things as the use of watermarks, invisible UV features, embossment, numbering, anti-copying format and colouring, etc.

- 9.30. Any certification arising from short courses that are *closely related* or *readily aligned* with the NQF must contain similar security features as above. The name and identity of the person to whom the certificate was issued must also be clearly named. The date of award must be shown. The certification must relate to a *named course* as stated on (or reflected by) any Scope of Accreditation certificate (or similar within higher education in Namibia).

The naming of the course must be:

- consistent with the learning outcome(s) developed and assessed within the course
- inclusive of the verified alignment with a NQF Level and NQF Credit value.

Where accreditation has been conferred by the NQA, the certification must state that the award has been made in accordance with the Scope of Accreditation granted by the Namibian Qualifications Authority pursuant to Section 13 of the Namibia Qualifications Authority Act of 1996.

### ***Non-credit bearing short courses***

9.31. Certification relating to non-credit bearing courses must not be misleading as to the scope of meaning assigned to the certificate. Thus, a Certificate of Attendance would be the most likely form of certification.

There must be no reference (or inference) on any certificate of attendance to any completion or attainment of learning by the holder of the certificate.

The duration of the short course should, ideally, be stated on any certificate of attendance issued.

### **Advice/Guidance to learners**

9.32. Learners (and the community at large) must have a clear understanding of the status of any short course offered in Namibia. The potential for being misled by bogus or unscrupulous providers and those overly-driven by commercial gain must be minimised.

9.33. Learners should be encouraged to participate in credit-bearing short courses that are covered by an Accreditation decision as there will be optimal benefits towards their lifelong learning in terms of credit recognition and transfer in learning and career pathways.

9.34. The benefits derived from non-credit bearing courses will be less obvious and more narrowly recognised. Learners need to be aware of the limitations in recognition of these courses. For example, non-credit bearing short courses covered by the VET Provider Registration will have some assurances of quality assigned to them. However, the acceptance of learning attainments by employers, other training providers, etc will not be automatic or, perhaps, substantial.

9.35. In some cases (such as vendor-specific training or continued professional development courses) there may be some real recognition or value assigned, albeit to and by a defined community of interest. The benefits could be in the form of employment, rights to ongoing professional practice, etc. Communities of interest may also give some recognition to short courses that have been developed or customised to meet specific purposes. Such recognition is, however, unlikely to extend beyond the relevant and immediate community of interest.

- 9.36. There will be some regulatory restrictions to any recognition of non-credit bearing short courses. Any certification for non-credit bearing short courses will, for example, not be evaluated under the provisions of the Evaluation of Qualification Regulations (Government Notice 182 of 2007).
- 9.37. Any certification for short courses not covered by an accreditation decision in Namibia or by a recognised quality assurance body in the country of origin (as defined in the Evaluation Regulations) will, similarly, not be evaluated by the NQA.

## List of Acronyms

BNVQF	Botswana National Vocational Qualifications Framework
BoTA	Botswana Training Authority
NCHE	National Council for Higher Education (Namibia)
MQA	Malaysian Qualifications Agency
MQA	Mauritius Qualifications Authority
NQA	Namibia Qualifications Authority
NQF	National Qualifications Framework
NTA	Namibia Training Authority
NZQF	New Zealand Qualifications Framework
RPL	Recognition of Prior Learning
RSA	Republic of South Africa
RTO	Registered Training Organisation (Australia)
QAA	Quality Assurance Agency
SAQA	South African Qualifications Authority

## Reference materials

ACS Distance Education (ASCEDU) website <http://www.acedu.com/about-us/accreditation-and-recognition.aspx>

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## **Interviews and discussions**

Namibia Qualifications Authority	Staff of the Accreditation, Audit and Assessment Section and the Qualifications Section.  Senior Managers of the above Sections  CEO and Deputy CEO
National Council for Higher Education (Namibia)	Higher Education and Quality Assurance Officers
Namibia Training Authority	Chief Operations Officer Manager: Quality Assurance Manager: VET Standards Manager: Training Advisory Services Manager: Research, Policy and Planning Staff: Assessment and Certification
Erica Gacawa	Manpower Development Centre (a private training provider in Windhoek)
Colin Hangula	21 <sup>st</sup> IT Paradigms (a private training provider in Windhoek)
Polytechnic of Namibia	The Registrar Staff in the Programme Development and Registration section.
Quality Assurance Bodies in Namibia	NQA and NTA (July 2014) NQA and NTA (September 2014)

**Email exchanges (various)**

Liz Bowen Clewley, Owner, Competency International Ltd, New Zealand

James Keivy, (then) Director: International Liaison, South African Qualifications Authority

Richard Sengalo, Manager: Standards, Botswana Qualifications Authority (formerly Botswana Training Authority)

**ANNEXURE A**

**Principles and Good Practice Guidelines  
for the Design and Delivery of Non-credit Bearing Short Courses  
in Namibia**

**Working Document**

**October 2014**

**Brent Richardson  
Frameworks Africa Consultancy CC  
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## Introduction

Short courses (courses that involve less than 400 hours of learner effort) in Namibia will, according to their specific character, receive different levels of attention by the education and training regulatory bodies in Namibia. Greatest attention will be given to those short courses that have a clear relationship to the National Qualifications Framework (NQF) of Namibia. Less attention shall be given to those short courses that are significantly removed from the NQF environment – those that are non-credit bearing.

This reduction in regulatory attention does not mean that non-credit bearing short courses are deemed to be less important or less significant in Namibia. They are and will remain an integral and valued part of the education and training sector and within the philosophy of lifelong learning. The lesser attention does not, furthermore, suggest that the design and delivery of non-credit bearing short courses should be removed from the core tenets of quality – fitness of and fitness for purpose.

The principles and good practice guidelines outlined in this document are intended to prompt quality requirements on the providers of non-credit bearing short courses without there being heavy verification of quality by the regulatory bodies and the quality management systems associated with the NQF, and the higher and vocational education sectors. It is acknowledged that overly demanding (and bureaucratic) quality assurance processes can constrain responsiveness in providing education and training that needs to happen quickly and appropriately in meeting needs. Assurances of quality remain, however, significant in an education and training sector where learning attainment is formally reported and accountability is considered important.

The principles and guidelines are, therefore, a step towards a more balanced approach towards assuring quality in education and training that upholds accountability as well as supporting non-credentialed learning.

## Core Principles

The actions of the developers and providers of non-credit bearing short courses (in fact, any short course) should be guided by the following principles:

- Learning associated with short courses shall have a developmental focus that supersedes interests associated with commercial gain.
- All learning in Namibia will make a positive contribution to the lives of all people and communities, the success of all businesses and enterprises, and the achievement of national development goals.
- All learners in Namibia can expect to be treated with respect in any learning activity in which they engage.
- Learners and other beneficiaries of short courses can expect diligence in the design of learning activities and expertise in the delivery and management of learning.
- The design and delivery of courses shall be participative and inclusive of the relevant, interested parties.
- Learners shall be able to apply their learning experience beyond the immediate boundaries of the learning environment.
- Delivery of learning experiences shall be worthwhile and meet the desired needs of individuals, communities, and organisations.
- Despite being a short-term relationship, the interaction between the provider and the learners and any client organisation shall be exemplified by integrity and professionalism.
- The provision and delivery of learning experiences shall set a good example of the value and benefits of engagement in lifelong learning.

## Good Practice

The above principles shall be reflected in good practice actions, specifically with respect to:

- The purpose of providing a non-credit bearing short course
- The learning experiences
- Learning materials, facilities, and environment
- Instructors and facilitators
- Publicity.

## *Purpose of the course*

When developing a short course, providers should:

- Use an appropriate process or processes to define and analyse issues or problems of individuals, groups, and organisations to identify a learning need(s) that could be appropriately addressed by a short course. The process should:
  - be systematic and identifiable
  - minimise assumptions and maximise the use of objective data
  - be negotiated with and be inclusive of relevant parties.
- Ensure that the identified purpose(s) becomes the basis for determining learning activities.
- Develop clear, concise written statements of the purpose of the course and its associated learning.
- Use an appropriate process or processes to identify the relevant characteristics of the learners likely to be involved in the course.
- Conduct a follow-up evaluation inclusive of relevant parties to determine the extent to which the course met or supported its intended purpose(s) and/or was relevant to the target group of learners.

Where an employer organisation wishes to seek reimbursement from the VET Levy for the provision of non-credit bearing short course training, particular attention should be given to establishing the *purpose* of any such training. This will likely be by way of some claims relating to the *impact* of the training for the organisation. Such impact could be reflected in such things as:

- reduction in production costs
- reductions in resource wastage
- reductions in worker absenteeism because of improvements in worker attitudes or because of fewer injury-accidents
- improvements in productivity rates
- improvements in profitability
- enhancement of market share
- etc.

Where a short course is utilised to achieve organisational rather than learner benefits, there should be a reliable way for proving that the intended results of the programme have been achieved – there should be some assessment of impact (as opposed to assessment of learner attainment). This possible assessment of impact should be carried out by the organisation benefiting from the training (rather than the provider of the short course).

In order for impact to be measured, there should be a valid benchmark(s) recorded that establishes the state of affairs before the training was undertaken. Periodic measurements after the training should be taken to determine the type(s) and magnitude of the impact for the organisation.

The system for measurement should be valid and could, perhaps, be audited by the NTA.

### ***Learning experiences***

When designing a short course, providers should:

- Utilise learning experiences that optimise and promote active learner participation (doing is often more effective than listening).
- Use learning experiences that are appropriate to the characteristics of the target learners whilst also recognising the individuality of each learner.
- Use learning activities that enable learners to move from the simplest concepts to more advanced levels of understanding.
- Enable learners to relate their learning to their own and other contexts and situations.
- Use resources and instructional media that is appropriate to the learners and that optimises their learning.
- Document learning activities in a comprehensive manner and in a way that makes sequential and developmental sense.

### ***Learning materials, facilities and environments***

When providing short courses, providers should:

- Use instructional materials that have a clear instructional purpose.
- Periodically review and update materials where relevant.
- Use equipment that is appropriate, safe, and relevant to the intended learning.
- Use facilities that are appropriate to the number of learners and the pedagogical approach being utilised.
- Use facilities that are safe, healthy and accessible to all learners.
- Use facilities and create a learning environment that is conducive to learning.

## ***Instructors and Facilitators***

When providing short courses, providers should:

- Use instructors/facilitators that are suitable in having:
  - relevant and recent subject matter knowledge and expertise
  - relevant qualifications and/or experience
  - personal qualities that enable them to interact meaningfully with the learners.
- Use sufficient instructors/facilitators for the number of learners involved (so as to optimise attention to each learner)
- Involve the instructors/facilitators in the design, development and review of learning content, approaches and materials.

## ***Publicity***

When advertising or promoting short courses, providers should:

- Be truthful and optimise the openness and transparency of information disclosed in any promotional materials.
- Fully and accurately disclose all relevant information regarding things such as:
  - the nature of the course
  - the parameters of service delivery
  - fees and charges
  - limitations and boundaries associated with the learning
  - the nature of and recognition attributed to any certification offered
  - the legal status of their organisation.
- Take all reasonable steps to ensure that their publicity avoids misleading people and organisations.
- Take all reasonable steps towards minimising the potential for misinterpretation of the nature of the learning and certification offered.

## **Expectations of Providers of Credit-bearing Short Courses**

Many of the guidelines given above are equally applicable to providers of credit-bearing short courses. However, as the need for established and confirmed credibility of learning and certification is amplified for these types of courses, more rigorous quality assurance must be applied.

Providers of any short course that has a clear relationship to the NQF are required to meet the relevant criteria of the relevant requirements outlined in:

- The Accreditation Standard – Annexure B of the Accreditation Regulations of 2006 and/or
- in the case of short courses in higher education institutions, the relevant provisions for Programme Accreditation as stated in the *Quality Assurance System for Higher Education in Namibia* document (NCHE 2009).

Providers of vocational education and training courses are required to also meet the Registration of VET Provider Regulations of 2012. Private institutions of higher education must meet the relevant registration requirements set by the National Council for Higher Education (NCHE).

It is expected that all higher education institutions offering credit-bearing (and/or non-credit bearing) short courses develop their own policy statements regarding such courses. These policies must be made available to the NCHE on request. As a minimum, such policy statements must refer to:

- Developmental and approval processes
- Facilitation
- Development of learning materials
- Assessment
- Intra-institutional recognition (Credit transfer, progression, etc)
- Evaluation, Revision, Re-approval and Quality Assurance
- Record keeping and Certification
- Funding
- Marketing.

It is not expected that the provision of short courses be the predominant business focus of institutions of higher learning.