

Ms Noluthando Skaka
Parliamentary Monitoring Group
2nd Floor, 9 Church Square
Parliament Street
Cape Town
8001

18 February 2019

Dear Ms Skaka

Following the request for comment on the NQF Amendment Bill, we wish to thank you for the document outlining the amendments and request your consideration for our recommendations contained in this letter.

- 1) With reference to #2.3 on the MEMORANDUM ON THE OBJECTS OF NATIONAL QUALIFICATIONS FRAMEWORK AMENDMENT BILL, 2018 page 8; we are pleased with the amendment that SAQA will be retaining overall responsibility for the NQF and that QCs will be required to consult on matters relating to their sub-frameworks and quality assurance.

- 2) Changes to existing qualifications registered on the NQF:
Currently, the NQF Act only allows for editorial changes to existing qualifications but given the rapid pace at which subject matter is evolving and the fact that there has been blanket re-registration of qualifications without content amendments since 2012, there is a need for an additional process which allows for structural and content changes to qualifications as necessary. (MEMORANDUM ON OBJECTS OF NATIONAL QUALIFICATIONS FRAMEWORK AMENDMENT BILL, 2018 #2.3 page 8).



- 3) Inclusion of maintenance of records of achievements against legacy qualifications is currently not listed as an amendment and it is our recommendation that this be added to #4 Section 13 of the Principal Act (b) (i) page 4.
- 4) #4 Section 13 of the Principal Act (b) (i) page 4 refers to the maintenance of a register of professional designations but does not allow for Professional Bodies to recognise and attach designations to additional qualifications which are quality assured by Quality Councils. Should this amendment be adopted, maintenance of these records should subsequently be included in Section 13.
- 5) #4 Section 13 of the Principal Act (e) (1A) page 4 refers “When verifying or evaluating a qualification...” it is recommended that this be done in consultation with the Professional Body / Training Provider in question to ensure that legacy qualifications and international partnerships are considered prior to a decision being taken.
- 6) Large amounts of data are submitted for upload to the NLRD on a regular basis. In the submission of this data mistakes may occur, what is the process to correct mistakes? We recommend that, if this recommendation is approved, the process be included as an amendment in 32B Offences and Penalties, page 6.

Should you have any questions, please contact either myself or Trudy Paul (trudyp@saica.co.za; 083 709 2919).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chantyl Mulder'.

Chantyl Mulder

Executive Director: Nation Building

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