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Design Evaluation of Draft Policy on Community Colleges

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DPME/DHET

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Design Evaluation of Draft Policy on Community Colleges

1. Background

Despite extensive discussion on the establishment of community colleges in the early nineties, there has been no policy in this regard. Recently, the Department of Higher Education and Training (DHET) amended the Further Education and Training (FET) Colleges Act (Amendment Act, No. 1 of 2013) to provide for the creation of a new institutional type, the community college. It is envisaged that existing provincial Public Adult Learning Centres (PALCs) will be transferred from provincial to national administration under the DHET and will in time be transformed into community colleges.

Following on the FET Amendment Act (2013), the White Paper for Post School Education and Training¹ (DHET, 2013) acknowledged the dearth of education and training opportunities for adults and post-school youth. It also raised concerns about the quality of the Adult Education and Training (AET) system in general including its failure to meet the needs of adults and youth to gain labour-market and sustainable livelihood- skills. These pressing problems make the community college an urgent necessity. DHET therefore developed a draft Policy on Community Colleges (PCC) Gazetted in November 2014. In addition to releasing the draft for public comment, DHET together with the Department of Planning, Monitoring and Evaluation (DPME) commissioned a design evaluation of the draft PCC.

2. Policy purpose

The draft PCC has two stated purposes:

- 2.1 To provide a framework that must guide the management of the shifting of the AET function from the provincial education departments (PEDs) to the exclusive competence of the DHET.
- 2.2 To provide a framework for the establishment of community colleges, where Community Colleges are understood as a new institutional form in the South African context. This includes policy guidelines for governance and management; conditions of employments; funding; programme and qualification offerings; quality assurance; examinations and assessment; and monitoring and evaluation.

3. The purpose of the evaluation

The main purpose of this evaluation is to assess the relevance and appropriateness of the draft policy on community colleges (PCC), with a particular focus on its fitness for purpose, its internal and external coherence, and its readiness to be implemented and evaluated in the future.

The timing of the evaluation coincided with the release of the draft PCC for public comment.

The findings of the evaluation are intended to feed directly into the policy refinement process. The draft PCC was finally only released in November 2014, instead of the anticipated date of July, which meant that this final report was not complete prior to the refinement process. However Stakeholder Meetings and a presentation to DHET officials in February and March, 2015 provided the findings to the DHET to include in the refinement.

¹ The ToR refers to the Green Paper on Post-School Education and Training. This has subsequently been revised, approved and released as a White Paper at the end of 2013.

4. Evaluation Approach

A policy *design* evaluation approach was specified in the terms of reference (ToR). This was the first **policy** evaluation conducted by DPME and was thus intended to serve to pilot an approach to policy design and development process in South Africa in the future. (Until now, DPME has commissioned **programme** evaluations.)

The ToR required that a Theory of Change and Logical Framework matrix be developed as this had not been done earlier. These drew on the implicit Theory of Change evident in the White Paper and in the draft PCC, and were used to frame the evaluation.

A qualitative approach was used in the design evaluation. Methodologically, this included: A review of literature and aligned policies; the development of the Theory of Change and Logical Framework matrix; individual and focus group interviews conducted with a range of senior DHET and provincial AET officials, as well as representative from national Treasury and the Auditor General's Office; and a conceptual analysis of the draft Policy according to the four key evaluation questions. The findings and recommendations of this design evaluation were presented at a stakeholder validation workshop where the results from the evaluation were confirmed and accepted. A presentation was also made to DHET officials. Inputs from both these processes were used to finalise the evaluation report.

5. Response to the evaluation questions

5.1 Is the draft PCC internally coherent, and is it aligned with other relevant pieces of legislation?

Embedded in this overarching question are a number of components which include: an understanding of the type of needs identification process that was undertaken as part of the preparation of the draft PCC; the extent of consultation with stakeholders; the alignment of the draft PCC with other relevant legislation; as well as alignment with any relevant UN agreements.

Overall it was found that a more thorough needs analysis is required and there has been a lack of stakeholder consultation in the development of the draft PCC.

With respect to the two purposes of the draft PCC identified in section 2 above (the so called function shift and establishment of a new institutional form), the logic underpinning both follows automatically from the Further Education and Training Colleges Amendment Act, 2013 and to this extent it is logical. However, this Act was passed without prior policy, that legislation preceded policy is in and of itself problematic. No rationale for either the function shift or for the establishment of the community colleges is provided in the draft PCC. Furthermore, no guidelines are provided in either case for the management of either of these processes.

The draft PCC does not elaborate on the purpose and form of community colleges beyond that contained in the White Paper on Post-School Education and Training 2013. Moreover, it does not elaborate on the unique character of community colleges. This, together with the lack of a clearly articulated "ethos and mission" (Draft PCC Section 1.17: p6) and the tendency to use the TVET College model as a default, could undermine the focus and potential efficacy of community colleges.

The lack of any detail pertaining to the resourcing and the management of the function shift and the establishment of the community colleges is a significant omission.

Alignment with relevant policies is weak. A number of related policies are listed but linkages are not made in the draft PCC. A number of policies, including the Draft National Youth Policy (2014); and the Draft Policy on Qualifications in Higher Education for Adult Education and Training Educators and Community Education and Training College Lecturers (2014) that are not mentioned at all.

5.2 Is the draft policy's theory of change appropriate, and is it sufficiently robust to address the problems of youth and adults that have been identified in the policy?

No explicit Theory of Change had been developed for the draft PPC. However when reflecting on the implicit Theory of Change underpinning the White Paper and the draft PCC, it is clear that there is a significant disjuncture between the draft PCC and the White Paper on Post-school Education and Training (DHET, 2013). In the White Paper, a much more creative, diverse and contextually relevant system is envisaged. Community colleges with community learning centres and partner sites in a decentralised and network type system responsive to local needs is proposed.

The retrospective Theory of Change developed by the Consultant drew extensively on the White Paper and identified a range of components necessary for the development of community college that are omitted entirely in the draft PCC.

In conclusion, the answer to the question therefore has to be that the draft PCC's implicit theory of change is *not* appropriate and sufficiently robust to address the needs of the identified youth and adults.

5.3 To what extent is the draft PCC measurable and therefore capable of being evaluated in the future?

To what extent is policy delivery of the draft PCC in the future measurable, as presently defined?

The lack of detail related to targets, timelines and quality criteria, leads to the conclusion that the draft PCC as currently constructed is not measurement or evaluation friendly.

While the figures quoted in the White Paper (2013) related to the envisaged increase in enrolments to approximately 1 million in 2030 make it clear that the potential target group is extremely large, no targets for enrolment in community colleges or graduate targets are provided in the draft PCC.

In addition there are a number of silences in the draft PCC on resource allocation and capacity: does DHET have the resources to implement the proposed policy, in terms of staff, skills, money, training, expertise? Is DHET able to offer the necessary support in terms of facilities, equipment, and other support available for the proposed policy? Clearly then, there are no indicators developed in these respects and therefore no means of measuring whether the targets are met.

Apart from the requirement, that community colleges submit prescribed data to the DHET, which relates to policy implementation compliance, there is no reference to a review or evaluation process related to the draft PCC.

The lack of any discussion on data collection and on the current need to building an effective data management system for the AET sub-system within DHET is an important omission.

Which stakeholders contribute to the results of the policy, what are their contributions and what are the implication of these for policy coordination and programme delivery?

As the Theory of Change shows, all the stakeholders mentioned in this section (the quality councils, the South African Institute for Vocational and Continuing Education and Training, Universities and TVET Colleges and the SETAs) play a key role in contributing to the policy success.

The implication of having such a necessarily broad stakeholder base, is the need for the DHET to play a strong coordination and management role to ensure coherence. It is for this reason that one of the key outputs of the draft PCC Theory of Change is the establishment of a national Chief Directorate or branch and regional AET directorates with the mandate and capacity to engage productively with a

range of partners. Unless the national and regional directorates are fully functional, the positive results of the draft PCC will be impossible.

5.4 To what extent is the draft PCC ready to be implemented?

A close analysis of the draft PCC has shown that there is only a legalistic framework for managing the shift of the provincial AET centres to the control of the DHET (the so called 'function shift'), and not even the broadest plan. Equally there is only a legalistic framework for establishing the community colleges, and only a broad plan for piloting them. No framework nor guidelines for establishing Community Learning Centres that are associated with the community colleges were evident.

There is also no mention made of departmental agencies or units that will be tasked with the design and development of programme offerings and learning and teaching support materials. No guidance is provided on any of the related programme provision processes in the draft PCC. The draft PCC is also silent on the matter of educator qualifications and professional development. There is no mention of an education information management system (EMIS) which is key for planning, monitoring and management and most importantly, there is no mention of how this new institutional type will be resourced.

Given the silence and/or weak articulation in the draft PCC of all the above mentioned components of the proposed community college sub-system, it can be argued that the draft policy is not ready to be implemented.

6. Conclusions and recommendations

The policy, as it stands serves two main purposes. One purpose is the function shift of the public adult learning centres, previously managed by the provincial departments of education, to the oversight of the Department of Higher Education. The second is the initiation of a new institutional form of education and training provision, the community college (and its associated community learning centres). It is clear from the analysis documented in our report that neither purpose is adequately served by the draft policy document.

6.1 Conclusions and recommendations in respect of function shift

Whilst it is acknowledged that the PALC system is largely dysfunctional (as noted in the draft Policy, the White Paper (DHET, 2013), and the Report of the Auditor General [2014]) there is little in the draft PCC that indicates a detailed plan or process to improve the situation to ensure that these centres become functional. We conclude as follows:

- 6.1 The plan to nominally consolidate PALCs into one community college may actually replicate all the problems of the past system, particularly in the larger provinces where little district or local support was given to these centres.
- 6.2 The model may actually disadvantage those PALCs that in certain provinces are functioning well and are supported by district or regional officials.
- 6.3 The lack of any estimation of budget requirements in the draft policy document, allied with the known past experience of the difficulties in the re-allocation of money previously given to the provincial departments of education (after the closing of the teacher training colleges and the shift of the FET colleges to national), suggests the likelihood of a shortage of funding and other resources to do anything by way of improving functionality.
 - 6.3.1 The lack of buy-in to the function shift proposal from the officials who were previously in the provincial adult education and training directorates or units is potentially disruptive. In particular their scepticism about the amalgamated PALCs being

- designated as a community college must be ameliorated.
- 6.3.2 The concept of a new institutional form of community colleges being associated in the public mind with what is in effect simply the old dysfunctional PALC model renamed will severely undermine the potential of an inspirational educational development.

Recommendation 1

- 1.1 Ideally PALCs should remain as PALCs under Regional offices but the FET Amendment Acts (2013) and the (November 2014) Government Gazette 38158 preclude this. Accordingly, there needs to be a differentiated conceptualization of how the merged PALCs are meant to operate in different provincial contexts. It is known for example that Gauteng AET is administratively more successful than other provinces and has a fairly large AET staff.
- 1.2 A more comprehensive policy and plan must be developed that deals with the ongoing (even if only interim) existence and support of youth and adult learners currently at the old PALC sites. Key outcome, performance indicators, and sectoral coordination structures must be detailed. This is not to be confused with the policy and plan for the new institutional form of community colleges.
- 1.3 The name “Interim community college” is inappropriate and misleading. An alternative should be found.

6.2 Conclusions and recommendations for a new institutional form

In respect of the *setting up of a new community college system*, we conclude as follows:

- 6.2.1 Details on many of the aspects needed to set up a community college system are insufficient. The description of the new institutional type and how it is to be built is inadequate and, at points, entirely lacking.
- 6.2.2 That what is proposed in relation to the setup of the pilot colleges (as well as the PALC conglomerate colleges) slavishly follows the TVET legislation and does not appear to meet the principles (set forth in section 2 of the draft PCC) nor reflect the vision in the White Paper (DHET, 2013) and the Task Team report (DHET, 2012) of a decentralised system close to learners.
- 6.2.3 That the Task Team report notion of a local network of community learning centres supported by a community college has been totally inverted to one of a centralised community college modelled on a TVET College which may have some satellites. This is extremely problematic given the need for community colleges to be easily accessible to youth and adults.
- 6.2.4 That the draft PCC gives no attention to the key concept of community learning centres, except to say that their heads must be appointed by the Minister.
- 6.2.5 That the minimal consultation in preparation for the draft PCC that has taken place to elaborate on the broad conception of community colleges contained in the White Paper (DHET, 2013) proposals will jeopardise the potential of this new institutional form.
- 6.2.6 That the need for the DHET to establish a significant internal structure (e.g. a Branch) to handle the applied conceptualisation and, coordination building of this whole new sector has not been adequately prioritised. Given the seriousness of the Auditor General’s report on AET, this is a grave shortcoming.
- 6.2.7 That the apparent lack of attention to the financing of the new system is hazardous.
- 6.2.8 Given that new programmes, curriculum and materials development will be crucial to improve the provision of AET, that the absence of any proposal of an appropriate mechanism to facilitate the development of these crucial elements, is extremely serious.

Recommendation 2

Therefore it is recommend that a more substantive and imaginative policy be developed that deals with the creation and sustainable continuation of a new institutional form of provision of adult and youth education in decentralised community learning centres supported by community colleges, and with the requisite resources of programmes, curricula, materials and educators and trainers. This policy process should commence with the development of a set of guidelines for the pilot community colleges, including the notion that they should incorporate a number of local community learning centres (PALCs, satellites or NGO Centres).

On the basis of this comprehensive policy for community colleges, the current legislation (Further Education and Training Colleges Amendment Act of 2013) must be reviewed and amended where appropriate to ensure that the unique character of community colleges as articulated by the White Paper (DHET, 2013) and the comments of the Minister's Advisor, drives the governance, management, staffing, and funding arrangements for the sector. This is in contrast to the current situation, where the legislation was developed in advance of the policy.

We note that this recommendation should in no way interfere with initiation of genuine pilots of community colleges.

- 2.1 Given the recommendation above, the new internal DG Task Team which we understand has been established to develop a comprehensive policy for community colleges is welcomed and is encouraged to embark upon a broad consultation process, especially with civil society.
- 2.2 The DHET will need to establish a significant internal structure (such as a Branch) to be responsible for the applied conceptualisation and building of this whole new sector and to ensure that the crucial South African Institute for Vocational and Continuing Education and Training (SAIVCET) functions are made operational, especially in regard to programme and materials development.
- 2.3 A detailed project plan, with an accompanying monitoring and evaluation framework for the pilot implementation should be developed before implementation to ensure deliverables and timeframes are clear and that lessons can be extracted and documented to inform the full implementation of the new community college system.