

Design Evaluation of Draft Policy on Community Colleges

Appendix 1: Policy Design Evaluation Fiche
Prepared for DPME/DHET

Evaluation No: RFP51/2014

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Design Evaluation of the *Draft* Policy on Community Colleges

1. Basic Information about the Policy design evaluation of the Draft Policy on Community Colleges

The main purpose of the design evaluation was to assess the relevance and appropriateness of the draft Policy on Community Colleges (PCC) gazetted for public comment on 7 November 2014, taking into account its fitness for purpose, its internal and external coherence and its implementability.

The evaluation was intended to answer four specific question:

1. Is the PCC's theory of change (logic) appropriate, and is it sufficiently robust to address the problems of youth and adults that have been identified in the policy?
2. Is the PCC internally coherent and is it aligned with other relevant pieces of legislation?
3. To what extent is the PCC measurable, and therefore capable of being evaluated in the future?
4. To what extent is the PCC ready to be implemented?

The findings of the evaluation will feed directly into the policy refinement process.

Although the evaluation would run parallel to the public consultation process before changes or additions are made to the policy, it needs to be noted that major recommendations in the policy have already been pre-empted by legislation, namely certain clauses in the Further Education and Training Colleges Amendment Act of 2013 (Act No.1 of 2013) and by certain administrative actions by the Department of Higher Education and Training (DHET) in relation to Public Adult Learning Centres (PALCs).

2 The PCC purposes

From the introductory explanation of the purpose of the Policy (in Sections 1 and 2) it is clear that there are two fundamental purposes (aims) to the draft policy:

1. To effect the transfer of the current Public Adult Learning Centres (PALCs) previously managed by provincial departments of education into the national control of the DHET and manage them so that they: (a) continue to operate and (b) are over time transformed to a more effective means of operation where they are linked to district level community colleges.
2. To create an entirely new institutional form, "the community college", which is not a TVET college and which is more closely linked to local and interest communities, and to pilot some at a limited number of sites.

These two purposes fit into the general rationale and justification for the Policy which is to provide appropriate education and training to adults and youth who are generally undereducated and

whose needs have not been met by, or who have great difficulty in gaining access to, or who are not ready or unqualified for, the current range of post-school education and training institutions. This rationale is more than adequately explained in Section 1 of the Policy.

3. The PCC objectives

There are three main objectives outlined in the policy:

1. To merge all the current PALCs in South Africa, previously administered by provincial departments of education, by legal fiat into nine “interim Community Colleges” whose institutional structure is nominally the same as a TVET college, and which will be administered by the DHET.
2. To pilot, at unspecified dates and places nine genuine local community colleges, again structured along the lines of a TVET college.
3. To start various ancillary process and sub-policy development activities related to programmes, examinations and assessment, etc.

There is little indication in the Policy as to how any of these objectives are to actually meet the learning needs of the target group of undereducated people or improve current practice in PALCs.

4. The Theory of Change/logical framework undergirding the PCC

Though the evaluation examined the extent to which a Theory of Change (ToC) process/preparation of a logical framework had guided the preparation of the draft policy (and noted the potential influence of the *White paper on post-school education and training* (2013) and the *Community Education and Training Centres Task Team Report* (2012)) through examination of documents and interviews with officials and stakeholders, it was necessary for a new ToC process to be undertaken to enable an analysis of the PCC to take place. Such a retrospective, if not reverse engineering, process is unusual. The results were that, as seen in the qualitative analysis of the PCC, it appeared that the draft PCC did not adequately embody the results of the ToC process. There is no evidence as to **how** the policy will achieve its purposes or indeed how these two purposes will meet the actual educational needs of adults and youth (as outlined in Section 1) that the policy is meant to address.

5. Description of the policy, its expected results and main activities

The draft policy is mainly a listing of a set of mechanical legal objectives and activities related to the function shift of the PALCs to the DHET and the equally mechanical application of the TVET College legislation supposedly “new institutional form”. See the section of the Evaluation Report on the Qualitative analysis of the Draft Policy on Community Colleges” for details. Timeframes are absent.

6. Stakeholders, links to other sectors and cross cutting issues

The Policy is silent on these (except in relation to examination accreditation with Umalusi and the QCTO. The right to adult basic education and references to gender and disability issues are absent.

7. Budget/Finance

There is no costing or budget at all. The only reference to finance is to the highly problematic assumption that monies previously dedicated in provincial education budgets to adult (basic) education and training will now be routed to the DHET. Such monies, even if fully transferred are anyway totally inadequate for the existing PALC system.

8. Implementation arrangements

These appear to be totally inadequate. The actual mechanics of the function shift are not outlined in any detail (and this was confirmed in interviews with officials at various levels) and the mega-“interim community colleges” bear no resemblance to the “new institutional form” envisaged in the White Paper. It is not apparent that the current DHET Adult Education and Training Directorate has the capacity to implement the desired policy.

There do not appear to be any measures for effective monitoring, evaluation and risk management.

9. Sustainability in relation to assumptions and pre-conditions

In the absence of a clear implementation plan and costing and budget there is no evidence to suggest sustainability.

10. Communication and visibility

The Policy did not appear to be widely known or understood within the DHET, officials from the previous provincial adult education and training directorates, except, and obviously, by those directly involved in the policy development process.

11. What needs to be in place?

The judgment of the evaluation team was that a more substantial policy development process needs to be started that is adequately resourced. A delayed start of implementation is better than a false start.