

National Plan: Consolidated Comments on Consultation Draft

Notes on these collated comments

Approach

The comments collated here came from individual inputs and only include substantive comments on content of the plan and meaning. Comments on grammar and spelling are reflected in the merged documents with track changes.

Comments Received

The comments that are collated here were received from the following individuals and institutions. Initials or names used in capturing the comments are also provided:

- Monica Mawoyo – MM
- Richard Jewison – RJ
- James Keevy – JK
- Mark Burke – MB
- Theuns Tredoux – TT
- Volker Wedekind – VW
- Engela van Staden – EvS
- Prof Muxe Nkondo – MN
- Sinegugu Duma (UKZN) – SD
- Julia Levin – JL
- UNISA – UNISA
- Ken Duncan – KD
- Ahmed Essop – AE
- Mandla S Makanya – MSM
- Council on Higher Education – CHE
- USAf Think Thank Session – USAf TTS
- UNISA HE Consultative Session – UNISA HE CS
- Durban HE Consultative Session – Durban HE CS

- Cape Town HE Consultative Session – CT HE CS
- Aruna Singh – (AS)
- Adrienne Bird – (AB)
- Sizwe Nxasana; Simon Trupp and Chantyl Mulder – (SN, ST, CM)
- University of KwaZulu Natal – UKZN
- Durban University of Technology - DUT
- Debbie Budlender – DB
- Human Sciences Research Council – HSRC
- Judy Favish – JF
- CET Principals’ Strategic Session – CET Principals
- Minister’s Management Meeting- MMM
- TVET Strategy Session- TVET SS
- Stellenbosch University – SU
- Prof Liezel Frick (SU) – LF
- South African Qualifications Authority - SAQA

Chapter One: Introducing the National Plan for PSET

Section Title	Issue and Page no	Comments
Purpose of the Plan	Goal of PSET in contributing to reduction of social and economic inequality (p.8)	There appears to be increasing ethnic, racial and class differences rearing its ugly head of late in the country which the post school education should help in addressing to be able to achieve the socioeconomic inequality mentioned in the document (UNISA)
	Regarding the fact that the Plan is referred to as a framework to implement the vision of the white paper	The Minister's preface to the White Paper is clear: <i>Following the adoption of the White Paper by Cabinet, and based on the framework that it provides, the DHET will elaborate a <u>concrete development plan</u> for the period up to 2030.</i> Therefore, the NPPSET should provide a <u>plan to implement</u> the vision and strategies of the WPPSET, and not another framework for its implementation (SAQA)
Objectives	Objective 7 where it specifies an objective of the plan is to ensure ...	The Plan cannot ensure. It can provide guidance on how the system can work towards common goals. Only monitoring can ensure ... (MM)
	Objective 8 which specifies – To increase	The Plan cannot increase but make proposals to improve collaboration ... (MM)
	Framing of objectives	Suggestions made to reframe as follows: The objective of the National Plan for Post School Education and Training is to provide a framework for implementing the policy goals of the White Paper, in order to: 1. develop an integrated post-school system by 2030 that is purposefully differentiated to meet the wide range of education, training, skills development and knowledge demands of the country; 2. deliver a diverse range of quality post-school qualifications and programmes that are responsive to the needs of students, society and the world of work; 3. simplify and better integrate post-school qualification pathways and articulation possibilities so that these are clear and facilitate appropriate opportunities that can be accessed by students; 4. build the capacity of post-school institutions to grow, transform and become more

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		sustainable, with a particular focus on the human capacity necessary for teaching, research, support, engagement, management and governance; 5. support the continued implementation of systemic initiatives that will result in improved quality of programmes and curricula, excellent teaching and learning, and significantly improved student success and throughput; 6. align the planning, funding and monitoring of the different components of the PSET system, wherever possible; and 7. increase collaboration and resource-sharing across the system, while ensuring the development of a diverse set of institutions and qualification types (MB)
	General on objectives	There is the need for the targeted differentiated offerings to try to achieve national goals but individuals come from communities and the need to try to tap into community resources needs to be emphasized as one of the objectives as well (UNISA)
	To provide a framework that can be used to integrate the PSET system	Is it sensible to use a term like integration? Can universities be integrated with colleges? Employers with colleges? During the Green Paper process this term was not viewed as being appropriate, but then it crept back and even got onto the front cover. The trouble is that the whole plan appears to be setting out to do something that is simply not possible. The alternative to changing the term would be to define it in such a way that it is achievable. Difficult but possible maybe (RJ)
	Framing objectives (pp8 – 9)	Overall objectives - seems to be much tighter and clear; I would look for some consistency in the use of providing a framework/roadmap but this is not critical; the emphasis on articulation is good; I would use current (1) as a preamble and start with (2); perhaps (2) and (3) can be collapsed?; (7) and (8) also seem to have some duplication; perhaps 2-3 overall goals will work best (JK)
Focus of the Plan	Realism about what can be achieved during Plan period	The Plan is cognisant of the need for change in the post-school education system, but concedes that changes need to be carefully executed to be effective and that timeframes for these changes need to be realistic (though no frame of reference is given for “realistic”). Presumably the notion of ‘realistic’ derives from an acknowledgement that a data driven approach is needed to inform systemic change (UKZN)

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	The White Paper points out the complexity of the relationships between education and the labour market, and calls for the establishment of a central skills planning mechanism. Substantial progress towards this has been made by the Department, and the Plan builds on this, <u>proposing strategies</u> for provision of information on the demand side to plan enrolments in PSET.” (p.10)	Instead of proposing strategies, the Plan should provide for implementation of the strategy proposed in the WPPSET and provide for resources to make this Plan a reality (SAQA)
	TVET Colleges also play a central role in the post-school system.... The Plan takes this forward to provide further guidance about the nature of the programmes to be offered in TVET colleges, staffing of colleges, as well as college relationships with formal employers in the public and private sector. In order to implement the goals of the White Paper in this area, the Plan provides a justification for rationalising and re-envisioning the programme landscape of the TVET colleges, to develop a strong and dynamic TVET sub-	This approach introduces confusion into the NPPSET as it no longer focuses on implementation, but also includes a new vision, approach and strategies for achieving the vision. It is recommended that this part be removed from the NPPSET and be included as an addendum to the WPPSET for further comment, debate and deliberation (SAQA)

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	system, including public and private provision. (p.10)	
	The Plan further provides strategies that will improve public understanding of qualification types and pathways, streamline the work of the Quality Councils, and develop meaningful articulation routes and reduce blockages to articulation across post-school education and training (p.11)	This can only be successfully achieved if it is done in consultation with SAQA and the QCs, and if it is aligned to the NQF Act and NQF Policies (SAQA)
	The Plan clarifies that programmes offered by different institutions must be defined by <u>purpose and type</u> , but institutions should not be limited to narrowly offering programmes at particular <i>levels</i> of the National Qualifications Framework (NQF). In particular, in the future, level 5 and 6 qualifications (Higher Certificates, Advanced certificates and Diplomas) will be offered at a range of different institutions, depending on their areas of specialisation and the occupational and professional area in which they are operating.” (p.11)	SAQA does not have a problem with this recommendation as long as the institutions meet the requirements for accreditation by the relevant Quality Council/s and/or professional body/bodies (SAQA).
	Description of new interventions (CAS, CDS, SAIVCET) pp 13 - 14	Here we explain only what SAIVCET does. For completeness we should also briefly elaborate what CAS and CDS are about (MM)
		The NPPSET must specify what each of the interventions needs to do and by when in order to

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		meet the objectives of the WPPSET. Regarding the DHET and SAIVCET/DHET and QCTO foci on developing curricula to meet “occupations in high demand”, it needs to be remembered that emerging but key sectors – such as Green Skills for the Green Economy and Sustainable Development – must be taken into account. The Sector Skills Plans and LMIP information will clearly feed into the choice of curricula to be developed. Care must be taken to include other robust sources of information on scarce skills/ skills gaps. For example, there is comprehensive research on the learning pathways needed for sustainable development (eg SAQA Bulletin 2017(1) and Ramsarup, 2017) (SAQA)						
	Career Development Services	At which level will the Career Development Services (NPPSET, 2017: 12) be pitched – will it also include universities through all their qualification levels? (LF)						
	Clarity of shifts in the Plan	<table><tr><td colspan="2">The shifts that Plan aims to bring about are currently buried in the text - consider concluding Chapter 1 with a table that sets out the major shifts the Plan aims to bring about (for example): (MB)</td></tr><tr><td>From...</td><td>To...</td></tr><tr><td>a proliferation of quality assurance bodies and cumbersome quality assurance system</td><td>a streamlined quality assurance system</td></tr></table>	The shifts that Plan aims to bring about are currently buried in the text - consider concluding Chapter 1 with a table that sets out the major shifts the Plan aims to bring about (for example): (MB)		From...	To...	a proliferation of quality assurance bodies and cumbersome quality assurance system	a streamlined quality assurance system
The shifts that Plan aims to bring about are currently buried in the text - consider concluding Chapter 1 with a table that sets out the major shifts the Plan aims to bring about (for example): (MB)								
From...	To...							
a proliferation of quality assurance bodies and cumbersome quality assurance system	a streamlined quality assurance system							
	The Plan moves away from the current focus on <u>scarce and critical skills</u> and proposes that the focus should be on qualifications and programmes for occupations in high demand, using three dimensions: programmes that are specifically needed for economic growth; programmes that will provide opportunities for employment for large numbers of people; and programmes that support social	In theory, SAQA has no problem with this shift. However, the Plan needs to go further to state how this will be achieved. It should also be noted that emerging key sectors – such as Green Skills for the Green Economy and Sustainable Development – should be taken into account. The Sector Skills Plans and LMIP information will clearly feed into the choice of curricula to be developed; care must be taken to include other robust sources of information on scarce skills/ skills gaps. For example, there is comprehensive research on the learning pathways needed for sustainable development (eg SAQA Bulletin 2017(1) and Ramsarup, 2017). (SAQA)						

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	development priorities.” (p.10)	
	The Plan’s use of three dimensions to replace the currently used scarce and critical skills	This is a difficult concept to make sense of. Can a programme be a dimension? Three different types of programmes? Is this really the typology of programmes that makes sense? Do these all fit within programmes for occupations in high demand (RJ)
		We welcome a focus beyond critical and scarce skills to those qualifications which enable larger numbers of individuals to access employment (SN, ST, CM)
	Occupations in high demand	Drawing on our recent occupations in high demand (OIHD) work, it is important that the signals that drive demand are well understood, and whether the demand is likely to be short or longer term. Moreover, demand in a particular occupation does not necessarily warrant the development of a new qualification. Thus, we advise that the proposal to develop intermediate qualifications is accompanied by a clear outline of how the OIHD list will inform the development of new qualifications (HSRC)
	The three dimensions are: programmes that are specifically needed for economic growth; programmes that will provide opportunities for employment for large numbers of people; and programmes that support social development priorities (p.10)	Is it sensible to distinguish programme offerings in this manner? Are programmes supporting economic growth different to those supporting social development? This could end up being very confusing to work with (RJ)
	Regarding the dimension: programmes that will provide opportunities for employment for large numbers of people (p.10)	Can programmes be designed to provide a large number of jobs? This is surely not realistic. Only employers can provide jobs. Surely we are trying to describe the broader TVET programmes that do not focus on a specific occupation but on giving young people entry to the labour market and the skills to access jobs as they become available. This is part of the debate about what is "occupational" and what is "Technical and Vocational"? Finding the right words is not easy but this formula does not really work. If the aim is to help simplify the complexity then this is not doing that (RJ)
	Integration of institutions currently being perceived to be in the skills	It is in the area of skills development that the concept of integration is most problematic. If much of skills formation is done in a workplace (not workplace providers but workplaces where the

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	system (p.10 PDF)	focus is on goods and services) then is it possible to see workplaces integrating into the PSET system? Surely the goal is greater collaboration around shared aims? And perhaps a level of integration "at the point of contact" - in other words an individual should be able to experience a system that is integrated from a systems and processes perspective (applications and funding) (RJ)
	White paper clarity that skills development is different from education and training (p.11 PDF)	Stating that the two are different is not helpful but also stating that they are not different seems unnecessary. The danger is that we then have a debate about whether you can simply state that or whether it is an aspiration. Much of skills development is done in isolation from public education and training institutions (in workplaces for example) and the challenge is to get institutions working with employers to raise skills levels. Skills are a partnership not a product of education and training institutions alone. It is unclear why this emphasis is needed (RJ)
	the DHET will ensure that there is overall strategic alignment between all PSET sectors, including skills development, and that planning, funding and reporting mechanisms can be meaningfully aligned (p.11)	This is the key issue. Better collaboration around planning and perhaps add implementation as well as reporting and QA (RJ)
		The main problem with South Africa is the tendency to "throw money at problems". Issues of integrated planning as well of the relevance of our education programmes need to be considered (CT HE CS)
	Private skills providers and workplace providers are understood as integral to the PSET system (p.11)	It is probably achievable to state that you want private providers and workplace providers to consider themselves as part of the PSET system. However employer based trainers are not necessarily seeing themselves in that light. They are more likely to see themselves as supporting business in their companies. Again why the determination to state that they are part of PSET? As if it is a fact? It is a conceptual aspiration that may or may not be a good thing, but it is not something that can be "declared". It is a bit like the developmental state. The president declares that we are one but does that help us achieve anything? (RJ)
		There are no plans mentioned in the NPPSET that specifically talks about private education providers as part of the solution (SAQA)
	The integration of the National Skills Development Strategy III and the new National Skills Development Plan into the National Plan is part of	So this is decided? We have NSDSIII to 2020, and an NSDP that is under discussion and now the two are to be integrated into the National Plan. Again it is stated as a fact not an intention. It may be a good idea to do this but the case is not fully made as yet (RJ)

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	this creation of a common strategy (p.11)	
	By absorbing NSDS III into the NPPSET, and locating NSDP as a distinct section of the Plan (p.11)	This is saying something different to integrating the two. One is now integrated the other is a chapter. Does integration mean a status as a separate chapter or that it no longer exists? (RJ)
	Post-school education, training, and skills development are a critical pillar of this continuum of education from birth to adulthood, including lifelong learning (p.11)	This is a good formula. But see how it gives education and training and skills development a role. Earlier it is said that education and training is not something different to skills development and yet here we are giving the two a supporting each other relationship. Which is correct (RJ)
	The mandate of the National Skills Authority (NSA) shifts in the Plan, as guided by the White Paper and elaborated in the new National Skills Development Plan, to a more focused role in monitoring and evaluating the SETAs and the NSF (pp11 – 12)	There is a big question-mark over this. Is it sensible to place skills planning unit in the planning branch, the skills planning support function in the Skills Branch, strategic planning in Public Entities, monitoring in the SETA performance and M&E in the NSA? Is this not creating silos within the skills system? The NSA even want to set up a section 3 entity for M&E. Is there not a more rational approach? (RJ)
	Clarification of role of NSA on pg 11 and pg 38	Page 11: “The mandate of the National Skills Authority (NSA) shifts in the Plan, as guided by the White Paper and elaborated in the new National Skills Development Plan, to a more focused role in monitoring and evaluating the SETAs and the NSF.” This is in line with the WPPSET and SAQA agrees with this approach. However, Page 38: “NSA will also engage with the QCTO in relation to identifying occupations for which qualifications should be prioritised” creates confusion between the role of the NSA and the proposed Skills Planning Unit. (SAQA)
	The primary role of the HRDC is to provide high level political support	This may be the desired future but the original intention was to "unblock" or address strategic weaknesses in the system. They also have an understanding of an "HRD System" that is wider

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	for the broad goals of the entire education system, guided by the core policies and implementation plans of the different sectors (p.12)	than education and wider than PSET. It covers both and so that "higher level" birds eye and non-operational role needs to be discussed and brought in here (RJ)
	The private sector is not a monolithic group in terms of post-school education and training provision. It includes private education and training institutions and providers, for-profit and not-for profit providers, State-owned and privately-owned workplaces that contribute to education, training and skills development: in short a range of providers playing different complementary roles. These need to be understood in their diversity and their different abilities to contribute to the overall goals of the PSET system, and the right kinds of support and incentives must be provided to enable their integration where necessary and recognition where applicable.	Again why integration? Surely the aim is to incentivise these institutions to align their work to the PSET strategy? Integration is not needed nor achievable. Even PPPs are not integration but more collaborative agreements recognising different interests coming together around those interests that are shared (RJ)
	SETAs mentioned as labour market intermediaries (p.11)	This surely is broader than just SETAs. They are but one example. See for example Kruss's definition which includes private role players and a range of public ones (VW)
	These have typically included private training providers (including workplaces that also play the role of	Are these (NSF and NSA) being classed as intermediaries? If so the sentence doesn't work grammatically (VW)

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	providers), those that enable workplace-based experience, as well as labour market intermediaries (the Sector Education and Training Authorities – SETAs (p.10 – 11)	
	Integration	Quality Councils – The Plan speaks on an integrated systems, and yet the quality councils continue to function separately. We need a more rational system in terms of how the three bodies work together (CT HE CS)
<i>Principles that have guided the development of the Plan</i>	In line with the White Paper vision, the Plan builds on and consolidates those aspects of the system that are working well (p.9)	This is fine as long as the intention is to propose activities that strengthen implementation (SAQA)
	Where change is proposed by the White Paper, the Plan sets out implementation strategies to achieve this change, paying close attention to the need for careful transitions (p.9)	Instead of broad strategies, there should be clear action plans, identification of who should implement what, what resources will be made available for implementation and how the implementation will be monitored (SAQA)
	In instances where the White Paper provides a broad vision without specifying a policy implementation trajectory, the Plan converts policy vision into implementation frameworks and strategies (p.9)	This is confusing and introduces scope creep into the document. An Implementation Plan should not have elements of setting policy and developing strategies. This aspect could form part of the next version of the WPPSET instead of being included in the NPPSET (SAQA)
	The Plan builds on the current capacity of the system, which means being realistic about what can be	This principle contradicts principle 3. What is the purpose of introducing new strategies and frameworks if we are struggling to implement the strategies that have already been identified as priority areas? (SAQA)

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	achieved over what period of time, but making sure that there is substantial movement towards achieving policy goals (p.9)	
	The Plan acknowledges that post-school education has a complex set of histories, but that it is possible to transcend the inequalities and divisions of the past (p.9 – 10)	This is a good principle. It should go further to clearly state what needs to be done by whom and by when in order to achieve this (SAQA)
	Difficult decisions may have to be made in an environment of constrained resources, and these should not be avoided or postponed (p.10)	This is a good principle. However, there is no point in having a well written NPPSET if there are no resources to implement the plan (SAQA)
Other comments	Plan timeframes	There is a need to look realistically at the timeframes. Putting together a Plan (in 2018) that is targeting 2030 may not be a great idea as the time span is too short. We need to think long-term and not spend too much time debating issues without implementing them (CT HE CS)
	Alignment with other policies and strategies	The Plan aligns well with the NDP and resonates with White Paper 3 (DUT)
	Private provision	There is a need for a clearer focus on the role of private provision within the Plan (MMM)
	Open Learning	The role of open learning in expanding access needs further elaboration in the Plan.
		The NPPSET does not outline a Plan to achieve this goal of the WP PSET (SAQA)
	Framing of the Plan	In the document the problems outweigh the strategy, and it seems the document was overtaken by events such as the announcement of fee-free higher education. Had the recent statistics from Statistics SA on youth unemployment been factored in? (MMM)

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		The plan needs to identify future action in response to the current problems. Although the plan declares that the vision for the PSET system was to create a coherent, coordinated and articulated system; it still looked disaggregated. The problem has to be stated upfront with solutions and timeframes. The plan was not a discussion document and should be seen by the general public as a plan with short, medium and longer term targets and not as a planning framework. (MMM)

Chapter 2: Building an expanded, effective, people-centred and integrated post-school system

Section Title	Issue and Page No	Comments
Chapter title	Notion of people centred	The concept people centred is not taken up in the vision or objectives? I would align these, or remove the term (JK)
Introduction		
Shape and Size of the PSET provision system	Roles and relationships of post school institutions: The sentence <i>The provider institutions that operate within the post-school system are not new institutions</i> (p.17)	Maybe we should say <i>not new institutional types</i> as there are universities that can be regarded as new institutions. I actually think we are talking about institutional types if we consider the whole sentence (MM)
	Role of HRDC as unblocking blockages (p.14)	Is there some duplication re HRDC and a slightly different message. Earlier the unblocking role was not mentioned (RJ)
	PSET diagram tries to show the complexity of the system (p.15)	And it doesn't show this enough. There are many other govt departments and agencies for example that add to the complexity, huge private funding mechanisms, local and provincial govt, that muddy the waters. So it's not the full scope by any means (VW)
	PSET Diagram (p.15)	The addition of the diagram is a good idea, but the logic (more so with DHET across the 4 borders) is a bit messy, also some other parts. I think it can be improved and the logic presented more elegantly. (JK)
		The PSET diagram is useful in highlighting the institutions that constitute the system. However, it fails to show how the different institutions are related. Moreover, the NPPSET should consider bringing workplaces closer to other skill development institutions, especially the SETAs, in the context of challenges with workplace-based learning (HSRC)
	PSET diagram (p.15)	Figure 1 depicting the PSET System is incomplete and does not reflect the current situation. The SETAs are an extension of the QCTO. SAQA is the apex body of the NQF family, which includes the

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		QCs together with SAQA. There is also no mention made of professional bodies who are responsible for ensuring that there is continuing professional development among the professions (SAQA)
	Defining post school	Taking the long-term historical perspective on system development, starting at the original ANC Education Policy Framework ¹⁰ , in our research report to the Parliamentary High Panel we argued that the PSET system should be conceived as <i>all schooling outside of the compulsory ten years of schooling</i> (Grade R to Grade 9) and therefore that post-school education is really any post-Grade 9/post-NQF level 1 provision. In this regard, anybody who completed Grade 9 is considered as one of “those who have completed school” and thus ready for post-school education and training (which then proceeds either on an ‘academic route’ towards the NSC or any of the other routes available). Conversely “those who did not complete their schooling, and those who never attended school” cannot be considered ‘post-school’-ready but require schooling related <i>remedial</i> provision of education and training opportunities. If it was clear that all who enter DHET-related PSET provision have at least Grade 9, there would be nothing in the way of DHET providing a firm plan on how to address post-school education and training needs. (It also implies that the current division of ministerial responsibilities between the DBE and DHET would need to be revisited.) (HSRC)
	The future role and establishment of SETAs, as well as the roles of the National Skills Fund and the National Skills Authority are described in chapter 2, section 3 (the National Skills Development Plan) (p.16)	It’s not clear whether this refers to this document or the NSDP (VW)
	Continued existence of some supporting institutions	Hard decisions about entities are needed and some of them seem to be redundant and they should not continue (USAf TTS)
	Merging NAMB with QCTO (p.16)	The merger of the NAMB and QCTO is contested - I assume there is more buy in? The key issue

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		here is the capacity and also focus of the QCTO. While I am in personally in favour of a merger, I am not sure if it is going to be best for the country, certainly not in the next five years (JK).
	The role of Umalusi (p.16)	The role of Umalusi in Post School Education needs to be further clarified (SD)
	Size and shape of provision system (p.17)	Is it worth making a point that these figures do not include institutions such as public colleges under other govt departments? And that the data on private provision is highly suspect and likely to be underreported... and detailing whether this is FTE or headcount? (VW)
	PSET institutions	In keeping with Chapter 1 and the WPPSET, the PSET system is again defined in terms of the institutions that fall under the purview of the DHET, and which provide education and training for “those who have completed school, those who did not complete their schooling, and those who never attended school” (WPPSET, 2013: xi). While we understand that this is a given starting point for the NPPSET, conceptually and practically it is not a very helpful definition. For example, our research for the Parliamentary High Level Panel of 2017 took the view that the education and skills development system in South Africa should be viewed in the first place, in terms of the training opportunities and formal qualifications it provides, and their relation to the labour market, and only in the second place in terms of ‘provider institutions’. We therefore took the view that formal education provision overall should be viewed through the lens of formal education opportunities and qualifications. Thus the National Qualifications Framework (NQF) sets out an overarching understanding, alongside that of institutional provision (HSRC).
	Relationships between PSET institutions	The PSET system diagram fails to show how the different institutions are related. Moreover, the NPPSET should consider bringing workplaces closer to other skill development institutions, especially the SETAs, in the context of challenges with workplace-based learning (HSRC)
	Private provision	It appears that the NPPSET conceives of the PSET almost exclusively as a <i>public</i> system, without paying much attention to private provision (which is significant in the TVET and HE space), the potential of Public-Private-Partnerships (PPPs) (except as far as student housing is concerned), and the historical and potential future role of SOEs in skills development (HSRC)
	DBE	While there is a wide consensus that one of the challenges affecting higher education relates to the ‘academic preparedness’ of those who get into the system, there seem to be a general silence

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		in the NPPSET regarding ways of improving the linkages between the PSET overall and the basic education system so as to improve on the quality of the majority of first time entrants into the TVET and the HE subsystems. The transition from basic schooling into the PSET system is a critical point to address, not only in terms of 'academic preparedness' but also to start channelling learners earlier (post Grade 9) into the TVET colleges (HSRC)
	Figure 2 (p.17)	Fig 2 has been well used and the message is clear - just be careful as the image is somewhat misleading in terms of the relationships between the numbers and the areas (JK)
	Figure 3 (p.18)	Fig 3 needs some work as well, e.g. "HE sub-system" must be added; the location of the same institution types across sub-systems is also a bit messy but probably OK. My main concern would be a comparison between Fig 2 and 3 - the one is based on enrolments and the other on institutional types - this makes it difficult to compare the two. The text is clear, so feel free to ignore my point (JK) Note - Resonates with Denyse's point about a pyramid offering better comparison
	Figure 3 (pg. 17)	Circles represent shape and size better than the inverted pyramid (USAf TTS)
	The White Paper has highlighted the unquestionable need to provide more opportunities, across the post-school system (p.18)	How many more (VW)
	The White Paper and the National Development Plan (NDP) targets for enrolment in PSET institutions are aspirational (p.18) This costing showed that as the White Paper aims to increase enrolments in the PSET sector substantially, more than doubling them by 2030	What are these? (VW) Why not be specific? (VW)
	the growth targets for the PSET	It really feels like the case for adjusting these targets would be strengthened if they were

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	system are not attainable by 2030 without significant new investment (p.19)	provided in some detail i.e. provide a summary of what the white paper and NDP actually envisage so that when we make proposals these can be clearly contrasted (VW)
		It looks like the current growth of the sector, if it continues, may actually surpass growth targets and projections made in the National Plan (CT HE CS)
	and this Plan argues that without achieving greater resourcing over time the system cannot grow and develop to meet policy goals (p.19)	A semantic point perhaps, but it seems strange to think of a plan making an argument... a plan is a plan, it may have arguments and justifications to support the plan. I guess it does highlight a question about how much this is a plan... (VW)
	The category of Higher Education College, now provided for in the Higher Education Act, also offers opportunities for incorporating other State institutions and in particular single-focus institutions (agriculture, nursing, teaching) into the post-school landscape over time (p.19 – 20)	And allowing some new colleges to emerge or change their focus over time in an evolutionary process? (VW)
	Specialist colleges	The recognition and inclusion of the Colleges of Agriculture, Police and Nursing into Higher Education System should resolve the confusion around which department is responsible/ accountable for these colleges e.g. between DHET and DOH for nursing education and training in Colleges of Nursing. (UKZN)
	Student housing is a possible area of growth, but will be guided by the framework and principles set out in this Plan. Growth of student housing will increasingly take place through partnerships with private organisations, and where public	And local govt? Very important in urban planning and regeneration (VW)

Section Title	Issue and Page No	Comments
	investment in student housing takes place (p.20)	
	Regarding the fact that costing will determine targets	This costing should be part of the Plan and not a stand-alone document (SAQA)
Qualifications, articulation pathways and quality assurance	Collection of adequate data to understand articulation (p.21)	The section on Articulation is too narrow. It should take cognisance of the: (a) Ministerial Policy for Articulation in PSET, (b) SAQA and Quality Council's policies for Credit Accumulation and Transfer (CAT); and (c) National Articulation Baseline Study (SAQA, 2018) which shows considerable actual articulation initiatives across institutions of learning (SAQA)
	Regarding the fact that occupational qualifications at levels 7 and 8 will be referred to as Specialised Occupational Certificates (p.25)	I think one of the comments from the last round was that this contradicts the logic of aligning nomenclature. I agree with that comment (MM).
	Simplifying the NQF	Streamlining the NQF and empowering institutions to be involved in the process and not merely being compliant is an excellent initiative. There will still, however, be some necessity for oversight from DHET to ensure standards are maintained and are consistent across institutions. Considering that institutions will be required to determine the efficacy of their programmes for training graduates for the workplace, having control over the implementation of new programmes will be essential. This will enable institutions to be more rapidly responsive to changes in the expectations of graduate skill sets (UKZN)
	Simplifying the NQF	It is worth pointing out that the reviewing the structure of the NQF proposed in this Plan will inevitably involve a reconfiguration of the HEQSF and the roles of the various Quality Councils (DUT).
	Role of the QCTO	Some of the proposals in the White Paper are flawed and need to be reviewed for example how

Section Title	Issue and Page No	Comments
		the QCTO designs and accredits qualifications (USAf TTS)
	Summing up the section	The section may benefit from bringing together the many different actions that will be taken and summarising it in bullet point form at the end (MB)
	Understanding articulation (p.21)	The distinction between systemic and specific articulation is useful (see the DHET's draft policy on articulation) (JK)
		It can be anticipated that articulation problems will persist as long as the institutions (and sub-systems) operate in silos (HSRC)
	This was done by introducing a distinction between the terms vocational and occupational which has no clear basis and is unworkable in practice (p.22)	Controversial. This will open up a big debate. Is that necessary? More important to clarify the distinction than to challenge the whole basis of the NQF Act (RJ)
	This was done by introducing a distinction between the terms vocational and occupational which has no clear basis and is unworkable in practice. (p.22)	Dismissed without saying what the distinction is or why it is not workable (VW)
	What it did not assist with, however, is articulation. Its weakness is a lack of integration across qualification frameworks (p.22).	It is said earlier that the NQF alone cannot achieve articulation and that all stakeholders must work to achieve that. This simplistic statement undermines that approach (RJ)
	Establishing a PSET ombud (p.22)	Strongly supported - see the report that JET prepared for SAQA on this matter in 2015/16. I would argue strongly for this to be outside of the DHET, possibly within SAQA, but ideally a completely separate but "lean and mean" body (JK).
		The establishment and role of the ombuds office seems to be minimised, yet this is so crucial (SD)
		The suggestion of introducing an ombuds or complaints office for the PSET system is supported; however, an ombud typically does not have a decision-making role, but rather provides advice

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		after independently observing all the facts (SU)
		SAQA developed a proposal to implement the Ombuds function specifically for Articulation. This proposal has been with the Minister since 2016. While the broader education and training issues such as student funding is outside the ambit of SAQA's mandate, dealing with issues of articulation sit squarely with SAQA and the QCs. DHET will need to work with SAQA and the QCs to address matters relating to Articulation (SAQA)
	Differences in nomenclature make integration difficult (p.23)	Integration was not intended in the NQF Act. The intention was to allow the three sub-systems to coexist. The issue is getting them to work together to achieve articulation (RJ)
		While SAQA does not oppose the nomenclature proposed for the QQSF, it should be noted that changing the nomenclature does not automatically promote Articulation. It is the design of the qualification that determines its Articulation within and across sub-frameworks (SAQA)
	Occupational certificates at level six will include Advanced Occupational Certificates and Occupational Diplomas. They will both have specializations included in their titles (p.24)	Does this mean that there will be no diplomas at level 7 and no occupational postgrad diplomas at level eight? Or is there supposed to be an occupational Diploma at level 6 and an advanced occupational diploma at 7? (VW) If there are existing quals that serve these purposes can names be retained or must everything be renamed according to this logic? (VW)
	The development of occupational certificates (p.25)	This section of the document is aspirational and does not lend itself to be easily implemented. Yet another layer has been added to the process through the Skills Planning Unit and the SAIVCET . While the idea of curriculum development taking place through one body – Skills Planning Unit – seems like a good idea, it is pie-in-the-sky because of the envisaged volume of qualifications needed and the human and financial resources required to make this happen. No plan is provided in this document as to how this will be achieved. The section on Curriculum Development must take into account the existing qualifications development and registration processes under the NQF Act, many of which are working efficiently and effectively. The sections on these pages need to engage with the system as it is, and with recent research (eg the DPME's NQF Act Implementation Evaluation) in order to move

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		the system forward. If the QCTO needs to take on the extensive additional functions described, it would need the additional resources to carry out these functions. The same could be said for the other two Quality Councils, and for SAQA. This matter was also a finding in the recent DPME NQF Act Implementation Evaluation (SAQA)
	One key problem is the idea of a one-on-one correspondence between qualifications and occupations. The Organising Framework for Occupations (OFO) is used as the basis for qualification development, but the level of the OFO that is utilised to support this design process is too detailed—so in fact, many ‘occupations’ are really jobs. Qualifications are therefore designed to be too fragmented and too narrow. Qualifications need to be broad enough to accommodate a family of jobs which involves greater aggregation. This applies across the NQF(p.26)	This is not how OFO is understood. It would be interesting to see the analysis that resulted in this conclusion. The OFO is certainly not intended to focus on jobs. So examples would be useful (RJ)
	Plans for the Department to capacitate SETAs to determine occupational demand (p.26)	ISFAP supports the proposal that DHET support and guide the SETAs to assist them in determine work- place demand, as it would appear that the current SETA mechanisms for performing this function do no lead to credible or reliable data (SN, ST, CM)
	An additional problem is that the current models are significantly	Not clear. I think I know what you mean but not sure a general reader would (VW)

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	based on a model that contracts work out of the core institutions, rather than on building institutional capacity (p.26)	
	The Skills Planning Unit is now being conceptualised as a PSET Planning Unit (p.26)	When was this decision taken? Sounds like something that needs a discussion. Is this just a name change or is the role of the unit different to the one envisaged? One issue that needs to be explored is whether planning, monitoring and evaluation should be in separate locations. Another is whether the term planning is correct. Is this a skills research or supply and demand research unit or does it get involved in planning? Does it provide information to planners or does it plan? (RJ)
		The plan is not clear where the PSET Planning unit will be located and what its functions will be. For example, if it is only to support PSET planning, then it would make sense to locate it in DHET; but if a broader approach to skills planning is contemplated, inter-departmental co-ordination will be required which means that only a part of the skills planning mandate falls with DHET (HSRC).
	The Plan and skills planning	In 2009 government articulated objective 5.1.1. which was to develop the evidence base to support DHET build a credible skills planning mechanism. To this end, in 2012, DHET commissioned the HSRC lead a consortium to conduct research related to skills planning. It is a surprise that this DHET commissioned research is not referenced and the only reference in the on skills planning is the section “understanding demand” on page 26. There is no reference to the key Skills planning reports (Skills Supply and Demand for South Africa and the Occupations in High Demand Report) (HSRC)
	Skills Planning and enrolment planning	There is much emphasis in this chapter on conducting system planning and it is clear that the focus is planning to inform PSET enrolment plans. It should be noted that this approach to planning departs from some of the suggestions from the Labour Market Intelligence Project (LMIP) which argues for a much broader notion of skills planning that incorporates a wider range of actors to address both labour market needs and social problems (HSRC)
	occupations—across various groups (managers, professionals, service and clerical workers, artisans, plant	If this is intended to be the 8 OFO groups it is not completely accurate. Sales is missing (RJ)

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	and machinery operators and elementary workers), (p.27)	
	The occupational framework will be revised to define the parameters of each of the occupational qualification types e.g. what are the characteristics of an occupational diploma in terms of purpose, credits etc. (p.27)	This probably assumes that the previous recommended nomenclature is agreed. However in this section it is confusing to have the new terms. Maybe use Certificate/Diploma/Higher Diploma in future to be referred to as..... (RJ)
	However, the QCTO and the Department must also be responsive to groups which advocate for the development of new qualifications (p.27)	Not too clear what this means and why it is here. There is an important issue that is so far not addressed and that is whether "Occupations in Demand are the only priority occupational categories that will be prioritised. There are occupations that are not in high demand but which are crucial to future growth. The danger of focusing solely on actual current demand is that future skills needs might be ignored. So rather than a general "loophole" clause perhaps address this in a bit more detail (RJ)
	The development of Intermediate qualifications (p.28)	Previously "intermediate occupational qualifications" is the term. Should this heading include occupational? (RJ)
	This will also require engagement with relevant industry associations and <i>growth-strategy driving government departments</i>	Weird term. Does this refer to DTI and DED? It isn't only about growth. Demand may be created in social services departments and sectoral departments like DAFF, Comms or DST (VW)
	The overall number of occupational qualifications will be aimed at between 150 – 300, to ensure that there are an adequate range of responsive qualifications for which	Just public? Maybe there is a need to think about whether public institutions will focus on an agreed priority list, that others will be public and private partnerships and others in the private sector (RJ)

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	there is demand, and which can be offered in public institutions (p.29)	
	The overall number of occupational qualifications will be aimed at between 150 – 300 (p.29)	Based on what? (VW)
	Qualifications must be organized in occupational families/clusters. <i>A one-size fits all approach may not be necessary for all qualifications</i> (p.29)	Does this refer to the organisation of the families or the size of the qualifications? (VW)
	The process must take into account qualifications which already exist (p.29)	What does this mean? Could be take note of, or could mean that if there are quals that exist that these should be used as a starting point. (VW)
	The SETAs will play an important role as labour market intermediaries in the area of occupational and professional qualifications (p.29)	Is this the first time the term professional occupation is used? It is a bit strange to do this in a section dealing with occupational quals. if this section is also about professional qualifications the more needs to be said about them. Maybe need a heading change for that so it is clear what is being discussed (RJ)
	Occupational programmes and the workplace requirement	The key issue in this regard is the need for occupational qualifications to have a workplace component - while a good idea in theory, this is simply not realistic. From the draft IPPSET it seems that there is consensus on this (JK)
	Level 5 and 6 offerings	The Plan needs to categorically specify the institutions that will offer level 5 and 6 for clarity (SD).
	Development of qualifications	Will the HE mandates be adjusted so that they can develop qualifications at a lower level? (UNISA HE CS)
	Provision across sub-systems	Can universities offer TVET qualifications? (A participant responded that it is better to focus on expertise already developed in institutions and leave other sub-systems to also do what they are good at rather than provide everything even in areas they are not strong at) (UNISA HE CS)
	Specialised Occupational Certificate	The introduction of a qualification type called a <i>Specialised Occupational Certificate</i> will

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		necessitate a review of the operational definitions of vocational, professional, and academic / qualifications (DUT)
	Specialised Occupational Certificate	Regarding the proposed Specialised Occupational Certificates at NQF levels 7 and 8, our view is that they should be called Diplomas given their NQF levels and the foundational knowledge required by learners to access them (DUT)
	Articulation	Articulation should be clearer. Create good articulation possibilities and communicate them well to the system. (UNISA HE CS)
	Articulation	The 50% residency clause needs clarification as it is disadvantaging students as there are different interpretations by universities (The 50% “residency clause” means that 50% of a programme has to be completed at the qualification awarding Institution. The residency clause requires RPL applicants to complete at least 50% of the subjects at the Institution that will award the qualification). (Durban HE CS)
	Articulation	The Recognition of Prior Learning (RPL) and Credit Accumulation and Transfer (CAT) will be central to the implementation of a Plan that seeks to create an integrated, coherent and differentiated system of post-school education. For the system to function as planned, the policy should specify in most explicit terms how the quality assurance agencies will collaborate in managing inter-institutional articulation and credit transfer (DUT).
	Articulation	The articulation between post-school institutions has in the past at best been fragmented, and based on the interests and campaigning of champions for a particular cause of creating articulation routes between specific programmes and across specific institutions. The directive of the NPPSET for a more co-ordinated and improved relationship between sectors and improved articulation possibilities is a welcome addition to the plan, although the possibilities are probably greater, and more feasible, between for example adult education centres and TVET colleges; TVET colleges and universities of technology (UoTs); and UoTs and other universities than randomly between institutions (although obviously not impossible). The role and function of recognition of prior learning (RPL) also comes into play in this regard. Clarity on whether RPL is used solely for equity and redress purposes or for prior learning in general, and whether it is used only for access, or for both access and credit will need to be clarified (as there is much diversity within the

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		post-school system and even within institutions) (LF)
	Quality assurance of assessment	The quality assurance of alternative forms of assessment needs to be addressed in the Plan (UNISA HE CS)
	SAQA standards	SAQA standards are not succeeding in creating mobility (UNISA HE CS)
Other comments on qualifications section	Considering other research	It will be good to make sure that this section is aligned, or at least takes into account, NQF Act evaluation report (JK)
	Reviewing nomenclature	Reviewing the nomenclature of occupational certificates - this seems to be going in the right direction. I would argue with this, that the QQSF be reviewed and republished with these changes, as well as others that impact on the QCTO's business model and approach to qualification development. JET and DNA Economics prepared a business plan for the QCTO in 2016/17. If you do not have a copy I think it will be good to cast your eye over it. The key point here is that the QCTO will need additional funding if it is to take on the responsibilities outlined. 0.5% of the levy is not enough, nor does it allow for sustainability. From our analysis it is clear that the calculation of the amount is less transparent and does not allow the QCTO to make long-term commitments in terms of staffing (JK)
	Qualification development	The role of professional bodies in setting curricula and quality assurance is largely ignored. Professional bodies are in close contact with their members, with business and with their counterparts abroad and are, therefore, very well placed to make an informed contribution to these deliberations (SN, ST, CM)
	Role of professional bodies	No reference to or recognition of the role played by statutory and non-statutory professional bodies is provided for in the skills development landscape. Particularly in light of the NSDP's objective to (ii) increase collaboration between the skills system, government and industry (SN, ST, CM)
	Professional Bodies	The importance of outlining a workable framework for the role of professional bodies in a Plan of this scope cannot be over-emphasised. This has a direct bearing on vocational and professional qualifications (DUT)

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Improving the labour market interface	Reducing the scope of SETAs' work (p.32)	Is there any change management process and rationalisation needed to support this refocused function or do we assume the SETAs will agree with this and there will be seamless transition to this refocused role? (MM)
	Aim of the levy supported institutions – distinction between employed, unemployed and pre-employed (p.32)	This distinction is very useful as it alerts providers that programmes should not be developed in a singular format – not one size fits all. Providers should develop programmes to suit the various groups of people based on this distinction (MSM).
	SETA shared services	Shared services and improved efficiencies of the SETAs is strongly supported - the problem is that this requires greater capacity within DHET (JK).
		ISFAP support the proposed system of shared services for the SETAs. It is our belief that a tighter, more streamlined focus for the SETAs is a key step in strengthening the manner in which they operate. Standardising the processes across all SETAs (use of technology, online portals, data analysis and reporting, proposal and applications) is essential to the effective delivery of the mandate of these structures. It will be important to ensure that a clear understanding of all the sectors is had when bringing the application process to a central point. Resource distribution for this administrative function will be important to get right to ensure that no delays occur in the awarding of projects and the disbursement of funds, which is currently the case. (SN, ST, CM)
		And what happens to the economic sector that that SETA was supporting if it gets dis-established? I think this proposal goes against the developmental focus of the Plan. Firstly, there will be focused monitoring from NSA and there should never be a point where a SETA performs so badly without the proper intervention to support it to perform well, if NSA are doing their work well. If SETA fails, then NSA has failed. I think this needs some rethinking? We need to emphasise capacity building of SETAs so that they do not fail (MM)
	Disestablishment of non-performing SETAs (p.32)	This point requires clarity so that both SETAs and associated stakeholders have a clear

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		understanding of the implications of de-establishment and what counter measures will be in place to ensure continuation of the SETAs' work within the sector and completion of projects that are still in progress (SN, ST, CM)
	One word reference to NEDLAC process on NSDP process (p.32)	Is there not an assumption here that the readers know what happened at NEDLAC? Maybe we need in one line or as briefly as possible note what the agreement was (MM)
	SETA ETQAs (p.33)	SETA ETQAs have not existed since 2008 - this needs to be corrected on p33. The shift of the QA functions, over time, to the QCTO makes sense, but again, is reliant on funding and capacity within a QCTO that is not strong (JK)
	Funding cycles of between 3 to 5 years	ISFAP welcomes the proposed move to a longer term funding cycle with the intention to address occupations in high demand. We believe that this presents a positive step towards supporting medium to long term imperatives in lieu of ad-hoc funded projects. We suggest that that the proposed 3-year funding cycle not be prescriptive but rather provision made to allow for an even longer funding cycle in instances where the respective professional qualification requires a longer time frame to complete or where extended programs are offered (specifically referencing the HDIs) (SN, ST, CM)
	SETA funding	Any project that requires SETA funding should be identified during the annual budgeting cycle and be put before all SETA boards for approval and not be used for the funding of late applications after the SETA budgets have been approved (SU) Consider submitting Work Skills Plans for a three-year period rather than annually; publishing the dates for the payment of 20% levies annually, and improving the discretionary grants process to eliminate late notification of allocations and delays with service level agreements (SU)
	Development and completion of regulations on SETA accounting authorities (p.37)	In the CET and TVET sectors there is an emphasis on capacitating governance structures for improved oversight and success of the sub-systems. Should the same recommendation not be made here for the SETA accounting authorities? (MM)
	A focus of the NSF levy will be on development of skills programmes offered through community colleges	This is not supported by the current strategic priorities to 2020. NSF funding allocation is in line with PSET budget distribution which allocates the most to universities then TVET and the least to CET. Should we say something to the effect that the current funding distribution should be

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	(p.38)	revisited? (MM)
	Capacity development within the Department (p.38)	Capacity development of DHET (p38) - one paragraph only? This is the real concern I have. If this fails the whole NPPSET fails. I would strongly recommend that more attention is given to the structure, leadership and capacity of the DHET. Also see the findings in this regard from the NQF Act evaluation (JK)
	A number of challenges relating to the SETAs need to be addressed, including: the lack of achievement of targets; governance challenges; complicated, expensive and wasteful administrative systems; complicated application processes for the public; and uneven capacity across the SETAs (p.30)	Is this list the ideal set of examples. Arguably if the term "intermediary" is agreed as the priority role of SETAs one of the challenges is lack of industry expertise and lack of appropriately skilled people to play that intermediary role. The over emphasis on administration of grants is a bigger challenge than cost of processes. Certain goals cannot be addressed by grant processes and need a project approach. The lack of project management capacity is also a challenge (RJ)
	The White Paper highlights the need to build on the important policy shifts that were introduced in NSDS III, including: ... driving skills development primarily through the public education system (p.30)	Is this a realistic goal? The public system plays a very small role at present, and the role should expand over time but the term "primarily" implies a huge shift that is not realistic at this time or in the period to 2030. A better formulation would be to see a continuing expansion of the capacity of public education institutions to deliver quality occupational programmes. This formulation also implies that skills are developed within these institutions when in (RJ)
	Establishing SETAs as permanent structures (p.31)	It seems premature to take a decision to establish SETAs as permanent structures in the PSET landscape which will have lasting implications, while the consultation process for the Draft National Plan for Post-School Education and Training is still underway. While the National Plan also proposes the permanent establishment of SETAs as intermediary bodies between demand and supply, albeit with a reduced set of functions, it does not in our view, appear prudent to implement some of the National Plan's proposals before there is clarity on the acceptance and

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		buy-in into the proposed size and shape of the overall PSET landscape (CHE)
		In terms of timing and sequencing of the implementation of the proposal, there is a further issue. The NSDP (2017) refers to the need to rationalise the SETA landscape, but it would in our assessment be difficult to realise this where the existing SETAs have already been established as permanent independent structures (CHE)
		The NSDP (2017) does not sufficiently outline a clear and useful role for the SETAs in such a way that necessitates their establishment as permanent independent structures. There is no sound argument put forward on why the functions envisaged for the SETAs as outlined in 2.2. require 21 permanent structures to implement. In terms of function a), which is 'understanding demand and signalling the implications for supply planning', which essentially appears to imply collecting data to inform sector skills plans, there is no compelling case made as to why this cannot be done by one skills agency, or by only a few such bodies. Indeed, much of the labour market analysis is proposed to be undertaken by the DHET, yet the SETAs will still be funded for this. The CHE cautioned against over-centralising functions in its previous comment, and it reiterates that concern, but equally if the proposal is to entrench the current SETA landscape, albeit with greater monitoring and evaluation systems, there needs to be a stronger rationale for it (CHE)
	SETAs will engage workplaces (p.32)	workplaces? Employers? (RJ)
	occupations and professions that support economic growth, encourage employment creation and enable social development for workers (p.33) - Repeated 3 times up to page 33	This formula has been repeated a lot in the document and looks like becoming part of the whole motivation for the plan. Perhaps it needs to be reviewed? For example self-employment is not mentioned and NSDSIII talks of inclusive growth rather than just growth. It is also unclear how skills can "encourage employment creation. Maybe support or be aligned to measures and programmes designed to do this? (RJ)
	SETAs should only undertake quality assurance related issues as they pertain to workplace approval (p.33)	There are dangers in calling this quality assurance as it brings a whole load of practices developed for providers into the work place. Perhaps use the term quality management? Also from a change management perspective it would be better to separate out QA and the functions shifting to the QCTO and other functions related to workplaces. More work is needed to

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		define what is needed in relation to workplaces. People engaged in learnerships are more likely to contribute sensibly to this than ETQA people (RJ)
	This requires that the functions carried by the SETA ETQAs (Information on Education and Training Quality Assurance) as well as those undertaken by the National Artisan Moderating Body are effectively integrated into the QCTO (Quality Council for Trades and Occupations) as initially anticipated. This process is already underway and will consolidate the role that the QCTO plays in ensuring the quality of occupationally-related programmes (p.33 – 34)	This intention has been on the table for a long time. Surely in an implementation plan there should be some analysis as to why this has not happened and what will be done to manage this better (RJ).
	This shift in function will also support the refinement of the role of the SETAs and reduce the quality assurance complexity for providers who will only be required to engage with one quality council (p.34)	Sadly, to date, this is not the case and the reasons need to be set out and addressed (RJ)
	The role of private HEIs within the SETA environment	Policy objectives should include a focus on aligning the quality and type of training and qualifications to what is required nationally, regionally and internationally for South Africa to be competitive (SU)
		A more detailed plan should be drafted to include a broad calendar with key milestones and

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		target dates, along with identified role-players responsible for delivery, to be translated into clear goals from the senior leadership all the way down to the most junior employee of the SETAs (SU)
		There should be a simple, central and standardized Work-Skills-Plans-and-Reports system and - process to enable DHET and employers/SETAs to identify the scarce and critical skills needed, i.e. to understand the demand (SU)
	QCTO will take on most of the QA role of SETAs (p.34)	It is clear that the intention is ultimately to incorporate quality assurance functions that SETAs may currently be undertaking into the QCTO. Consequently, it is not clear how one of the main functions of the SETAs will be “driving the provision of quality qualifications” if they no longer have a quality assurance role
		Given the critical role that the QCTO needs to play in the delivery of occupational qualifications, ISFAP recommends a greater focus on the development, resourcing and funding of this quality council to enable creation and delivery of post school education and training interventions (SN, ST, CM)
	There are several costing implications in this regard. The funding allocation of the skills levy will be reviewed to ensure the funding is in line with a reduction of quality assurance functions previously performed by the SETAs. Further, based on the QCTO business case the skills levy allocation as well as the fiscal allocation be reviewed to enable the QCTO to achieve the objectives determined. The skills levy determinations for the QCTO should also be in line with the longer term	This is a complex HR issue. Normally in government a function shift is accompanied by a shift in budgets and staff but this is not being spelt out here. In an implementation plan it would be good to see some more detail on how this will be implemented. It will probably require legislation to get over boards not cooperating with such transfers (RJ).
		Current resourcing and budget constraints at QCTO are resulting in the inability to provide support to Professional Bodies and Training Providers with specific regard to the following: a. Realignment and subsequent registration of qualifications due to expire in June 2018. b. Registration as AQP where there are multiple applications by Professional Bodies and Training Providers for the same qualification/s. c. Reduced turnaround times with regard to the quality assurance process prior to qualification registration to ensure currency and relevance of qualification content. Establishment of dedicated training centre/s to support the achievement of the workplace learning component within occupational qualifications i.e. simulated work environments in the event that the workplace learning cannot be completed in the actual work environment (SN, ST,

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	planning of the system so as to ensure an allocation of the skills levy over a 3 to 5 year planning period (p.34).	CM)
	The QCTO will engage with the National Skills Authority on a regular basis in relation to its mandate (p.34).	More clarity is needed. What is meant by mandate? Need to narrow this as the governance of QCTO is already problematic. Bringing the NSA in could make the problems worse (RJ)
	The extent to which this results in qualifications being taken up and resulting to the intended outcomes will be monitored through the SETAs, NSA and the QCTO (p.34).	The Skills Branch currently has this function, so should probably get a mention (RJ)
	It is further recognized that the skills planning system will support programmes against qualifications that are quality assured by other quality councils and that articulation, through improved relations between the quality councils, and institutions, will be encouraged and supported through the allocation of funding (p.34)	How would this work? Is this explained? (VW)
	Any changes that are made will be consistent with the initial purpose of the skills development levy, and	These two things can very easily be in tension. Just saying (VW)

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	aimed at increasing efficiency and effectiveness of the use of the levy to <i>meet the demand for skills in the economy and to support expansion of the PSET system</i> whilst improving quality	
	0.5% of SDL to support the QCTO's capacity to perform the relevant quality assurance functions for intermediate level vocational and occupational programmes offered by both public and private providers (p.35)	Will this just be intermediate level? Has this term been clarified? Is it level 5 and 6 as per previous section? Or does it include level 4. What happened to levels 1-3? (RJ)
	Regarding the fact that the NSF will continue to operate as a catalytic fund (p.35)	This concept is quite problematic. One of the problems that DHET now has is that the NSF has funded certain things temporarily (as a catalyst) but the anticipated funding has not materialised. So what happens? Programmes get dropped and there is no sustainability. There is a need to define the role of the NSF in funding sustainable programmes that the levy administered by SETAs cannot reach. Is it intentional that this sections states "supporting the development of community colleges"? Could the NSF be a sustainable source of funding for community college programmes? This was suggested in the WP funding report (RJ)
	SETA boards (p.35)	The problem is that these boards will stop much of what is being proposed. After so much time trying to mend these boards maybe it is time to review the need for them (RJ)
	Use of SETA funding (p.35)	The document has been found to be ambivalent in several places on what the SETAs would be funding (apart from information collection). At various places in the document there are contradictory indications with respect to what the funding is to be used for: In 3.a.i. reference is made to funding institutions; in 5.a. the reference is to "funding of occupations in high demand"

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		and in 5.b. it is to “national imperatives the focus on the needs of the poor (20%)”, and in other places they are funding programmes for people to “access occupational programmes in high demand”. Is it students, employers, institutions, or learnerships for workplace-based experience? If it is providing grants to students to study at an institution, then how does this relate to the NSFAS system? This is confusing for a reader who is not familiar with the current SETA functions and should be spelled out with greater clarity (CHE)
	Allocation to SETAs and QCTO	The funding allocation to SETAs in this proposal appear to be little changed from the current dispensation (unlike the proposed changes in the NDDS 2015 document). There is an intention signalled for the use of more shared services between SETAs to effect cost-savings. The concern is that there is not a greater allocation to the QCTO to perform all the functions it is envisaged to perform as the SETAs’ roles are reduced (CHE)
	The decision about numbers on the accounting authority will take into consideration the nature of the sector (for example the number of sub-sectors) (p.35)	The important thing to achieve is a process of formal consultation with industry. This is not necessarily (probably not much at all) done via the board. Better to consider this criteria in relation to advisory structures (RJ)
	The planning cycle will in future align with the Medium-Term Strategic Framework (MTSF) 5-year planning cycle and the MTEF 3-year budget cycle. Thus SETAs will establish their 5-year priorities against defined outcomes, a 3-year budget against this plan, and submit annual performance plans (in accordance with the requirements of the Public Finance Management	I think this is all fine, but skills pipelines are much longer, and there should be an encouragement to do broad longer term (say 10 years) plans as well, so that we are planning, especially in high skill sectors where it can take 5-8 years to get one graduate out, and it takes two years just to get a new qual on the books (VW)

Section Title	Issue and Page No	Comments
	Act, 1999). These plans will be reviewed within the context of the DHET plans for the post-school system (p.36)	
	Standardised timelines for Awarding grants to workplaces (p.36)	Can a grant be awarded to a workplace? Employers? (RJ)
	There have been a number of concerns about the role played by the authority (p.37)	There are a number of sections making reference to the NSA. None analyse the current statutory role of the NSA or why a problem is seen to exist. The road map to changing from one role to another (including legislative change) is not clear (RJ)
	It is intended that workplace data will be analyzed centrally so as to allow for an economy-wide analysis of the occupations that are needed to support economic growth, encourage employment creation and enable social development (p.37)	Maybe this is where the longer term planning happens? (VW)
	The NSA will be restructured and refocused (p.38)	There is a strange debate going on in NSA at present where they want to be established as a section 3 entity. In addition to having planning, monitoring and evaluation in different places you could see the silos being made worse by making it an entity (RJ)
	NSA will also engage with the QCTO in relation to identifying occupations for which qualifications should be prioritised. (p.38)	This implies a planning role for the NSA. Again there is emerging some duplication of functions. If part of planning is to be here and part in the Planning Branch and part in the Skills Branch and part in Public Entities maybe a review is needed? Planning is beginning to look like a very fragmented process (RJ)

Section Title	Issue and Page No	Comments
	Individuals already represented (p.38)	Does this mean individuals or institutions. I don't think individuals are represented – could just remove that word (VW)
	All social partners will need to support the principles and proposals outlined in this plan (p.38)	Really crucial, but very difficult at broad level. Need to try and build this around very specific sector or industry programmes (VW)
	SETA funds being channelled into the provision system	The envisaged function b) for SETAs, i.e. 'steering the system to meet this demand', is very broadly described as follows, "The SETAs will manage and use the levy-grant mechanism to support the process of collecting information and steer the system to ensure that funding concentrates on driving the provision of quality qualifications and/or workplace-based experience". It is not clear what this actually means in practice, and whether these are functions that overlap with those of other bodies. Some sharp questions arise: Does this mean that SETAs will be providing a funding stream to education institutions outside of the formula-based subsidy grant? How, in the public sector, does this relate to the DHET's provision of subsidy funding to universities, TVET colleges and community colleges and its "steering of the system"? Given the important shift announced in 2.b) iii, to "drive skills development primarily through the public education system, and in particular through universities and TVET colleges", the rationale for why it is necessary to route skills levy funding through 21 SETAs to reach the institutions is not convincingly made in the proposal. The possibilities for distorting the system and for wastage through inefficiencies such as double funding for certain programmes are clearly evident. (CHE)
	Positioning of skills in the Plan	The organisation of the Plan based on skills is a seismic shift but the skills part of the plan is the weakest and needs to be conceptually strengthened. Skills can be positioned in relation to the political context (USAf TTS)
		The Plan reads like a manpower Plan as skills are overplayed (USAf TTS)
	Links with Industry	Linkages with industry is a critical area. Is the education relevant and is it going to be used and absorbed? (Durban HE CS)
	Scarce skills	Is there M&E in relation to scarce skills so that we track exit outcomes of what are regarded as

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		scarce skills? (Durban HE CS)
	Learnership grant	The grant amount per learner, per qualification for learnership requires review to ensure the right quality of learning delivery (SN, ST, CM)
	Youth unemployment	In the SONA by the President mention was made of how to deal with Youth Unemployment. It is our firm belief that SETAs have a critical role to play in assisting with the development of these internships/learnerships and making funding available to support the Youth as part of Youth Employment Services (YES). Again, it is critical that all the programmes are reliant and working harmoniously to achieve a single vision of dealing with unemployment. Our country cannot afford to have business not working within the current skills structures. It is all about collaboration and alignment (SN, ST, CM)
	Suggestions on vision, objectives, and impact measures of NSDP	Vision: Educated, skilled & capable workforce for inclusive growth Impact measures: Falling incidence of scarcity in critical occupational areas Rising skill profile of the South African citizenry OBJECTIVE 1: MAJOR OCCUPATIONAL GROUP TARGETS • Targets for MANAGERS (WITH FOCUS ON PUBLIC SERVICE) • Targets for PROFESSIONALS (INCLUDING RESEARCHERS AND TEACHING PROFESSIONALS); • Targets for ASSOCIATE PROFESSIONALS • Targets for SERVICE AND CLERICAL WORKERS • Targets for ARTISANS • Targets for PLANT AND MACHINE OPERATORS • Targets for ELEMENTARY WORKERS including those working in community / informal sector OBJECTIVE 2: SPECIFIC PRIORITY OCCUPATION TARGETS Detail under each of the above what occupations in particular are in demand (flowing from OiHD research). And determine which employment sector / sub-sector / informal sector they might be

Section Title	Issue and Page No	Comments
		developed for and which SETA they fall under and which of the three primary organisations they fall under (uMalusi, SAIVCET, CHE). OBJECTIVE 3: DEVELOPMENT OF OCCUPATIONS IN DEMAND At the third level there is a need to identify which institutions and workplaces will be targeted for investment to lift their graduation targets from where they are to where they need to be if targets are to be met. OBJECTIVE 4: IMPLEMENTATION SUPPORTED Expert teams, to be known as Occupational Teams or Professional Bodies, will work with institutions and workplaces to determine interventions required to improve their performance as Centres of Specialisation and associated workplaces. Funding will flow to these institutions and workplaces using a clearly determined model of funding between fiscus and levy (see Financial Agency above) NOTE: Objective or level 4 must synchronise with DHET Strategic Plan / APP which is the supply end of the strategy. (AB)
Infrastructure planning and development for PSET	Suggested addition to end of infrastructure section	Consider adding the use of the IEG as a mechanisms to steer the higher education sub-system towards the adoption of norms and standards for infrastructure development and maintenance over the life cycle such infrastructure investments (MB)
	Establishment of the infrastructure development Unit	Another addition to the PSET landscape is the Infrastructure Development Unit, but the plan does not address questions of capacity to support this unit (HSRC)
	Once established, a critical task of the IDSU will be to conduct a national audit of publically-owned	Does this include universities? Their infrastructure is technically not publicly owned, is it? (VW)

Section Title	Issue and Page No	Comments
	infrastructure (p.40)	
	ICTs	There should be a separate chapter on ICTs (USAf TTS)
		ICT needs a chapter on its own as a lot can be unpacked. (UNISA HE CS)
		A significant expansion in ICT infrastructure is cited as necessary. How will this be funded? Will it be part of the allocated budgets or will it require a dedicated strategic budget? This could prove extremely costly as infrastructure would have to refer to both venues and ICT equipment as well as qualified personnel to install and maintain the equipment (UKZN)
	Precincts	The concept of an education precinct is limited to infrastructure and can it not also include regional collaboration. Can there be regional precincts where it is feasible? (USAf TTS)
	Accommodation	It is not clear how accommodation issues are going to be addressed. The Plan just says about 20% of students are in university accommodation but does not say how this will improve (UNISA HE CS)
	Accommodation	The Plan does not address issues of accommodation. It does not address infrastructure (UNISA HE CS)
	Differentiated infrastructure	Integrated infrastructure planning is difficult in practice as we cannot generalise infrastructure and we do not want a system that is not underpinned by robust infrastructure. The Plan should not adopt a generalised approach. Balance of evidence should be used to make the decisions on infrastructure. The Plan should specify how we implement the recommendations of the ministerial student accommodation report. Infrastructure for teaching and learning should be based on a differentiated approach. (Durban HE CS)
	Differentiated infrastructure	There cannot be a one size fits all approach to infrastructure development. Look at differentiated way of funding for infrastructure. Infrastructure is also linked to success so it must be developed where enrolments have to grow. (Durban HE CS)
	TVET colleges as university campuses	TVET colleges are well spread in communities and universities are not so well spread. Could TVET colleges service more local people for university education to enable access at the infrastructure

Section Title	Issue and Page No	Comments
		that is available where the people live? (Durban HE CS)
	Conceptualisation of precincts	Although the idea of precincts is innovative, they seem to be conceptualised based on geography and not educational motivations. (Durban HE CS)
	Infrastructure audit	Audit of infrastructure proposed in the Plan is supported. (Durban HE CS)
	Efficiencies in infrastructure use	Resource sharing is proposed as one method for cost cutting. This is in principle possible as there are some areas where available resources could be better utilised. For example night classes for students who are already employed. This would link with the goal of opening access to a broader cross section of the population. The Plan notes that investment in various forms of infrastructure will be required. This includes student housing, larger multi-purpose lecture theatres, more student learning spaces, office and work spaces for additional academic and support staff, more libraries, e-learning centres, workshops, work simulation rooms, laboratories, research facilities and equipment, IT workstations and networks. Moreover, it is recognised that the maintenance and upgrading of present facilities is required to get them operating at full capacity and keep them operating optimally to accommodate anticipated growth. The document is therefore (encouragingly) realistic about what can be achieved with the current infrastructure and funding (UKZN)
	TVET College infrastructure	There are concerns that new infrastructure may well be required for the system, particularly given the new funding allocations to TVET- this should be re-visited. Optimal use of existing infrastructure through better timetabling and sharing resources may not be adequate for increased enrolment. (TVET SS).
	Whole section on infrastructure	Regarding infrastructure (Page 39): This whole section is too vague, and needs to be clarified. In addition, there is considerable research into the development and maintenance of infrastructure, which needs to be taken into account (eg SAICE, 2017; Wall, 2018). There is a lot of evidence for example, that (a) the <u>maintenance of existing infrastructure</u> is far more efficient and effective – and cost-saving – than the development of new infrastructure, and (b) the infrastructure maintenance creates jobs for people with entry-level skills upwards (SAQA)
Other comments	Overview of chapter	This is overall a good chapter, it should be noted that a few gaps remain: for instance, it can be anticipated that articulation problems will persist as long as the institutions (and sub-systems) operate in silos; it is clear that a redesign of qualifications every two years is not only expensive

Section Title	Issue and Page No	Comments
		but also highly impractical; and there is not much discussion on how to improve responsiveness (HSRC)
	Critical citizenry	The Plan should be more explicit about how issues relating to values, ethics, tolerance, diversity are to be dealt with in the various context of training, education and personal development (DUT)
	Career guidance	The role of career guidance and academic advising that cuts across various levels and sectors of the system should be highlighted. Therefore, the Plan should be read in conjunction with the <i>DHET Framework for Cooperation in the Provision of Career Development (Information, Advice and Guidance) Services in South Africa (2012) (DUT)</i>
	Regional Managers	The role of regional managers is not clear in the draft Plan. It should signal that these already exist, and give direction on what should be done next to strengthen these regional structures. (TVET SS).
	Education and training	professional bodies and professional learning need to be added to all mentions of the <i>education & training system</i> in order to complete the education-training-development-work picture. SAQA recognises professional bodies and registers their professional designations – and these are key parts of the PSET system (SAQA)

Chapter 3: Community Education and Training

Section Title	Issue and Page no	Comments
Introduction	Reference to CET Plan and NPPSET Plan	Not sure how we distinguish between the PSET Plan and the sub-system plans. Should we say the purpose of the CET Plan otherwise it becomes confusing that in chapters 1 and 2 we speak about the purpose of the Plan broadly and here we talk about the purpose of the Plan being about establishment of CCs (MM)
	WP enrolment target of 1 million students (p.45)	The target of 1 million students and 27 centres by 2030 is too low, given that the need is great (current estimates around 3 million 15 to 24 year olds and 4 million 25 to 34 year olds not in education, employment or training). Roll out needs to start by 2020 and a bigger target is necessary as these numbers are likely to increase (page 45) to address the current unemployment, post education and training crisis linked to

Section Title	Issue and Page no	Comments
		ongoing civil unrest. The only way to achieve a bigger target in the proposed timeframe is to accept the need to let go of a traditional infrastructure / teacher led approach and expand thinking to include well documented strategies that incorporate a strong focus on Information and Communication Technology, Open Access Resources and a Train-the-trainer approach (JL)
	For these reasons, South Africa cannot afford NOT to invest in Community Colleges (p.46)	The tone of this section is advocacy. Shouldn't the plan simply assert the steps needed to make the vision real, or is it still necessary to persuade people? (VW)
	Identification of unused buildings that can be refurbished - will require an infrastructure audit of both the former PALCs to establish where space is owned by CLCs, as well as of other public infrastructure that can be utilised for college learning and related activities (p.49)	Is there a need for the shared services model suggested by the Imbali precinct being reiterated as a principle for the future roll out of CCs? Seems a shame to build more Admin Centres when there may be possibilities of beefing up infrastructure at universities and TVETs, especially in municipalities that are well served by other institutions. This proposal is much weaker. (VW)
		Do community colleges not belong to the DBE for upskilling of adults? (UNISA HE CS)
Community colleges in 2017	Use of NPO and NGO (p.44)	Any reason for sometimes using NPO and sometimes NGO? (DB)
	Community Development Works (p.44)	I think Community Development Works is meant to be Community Work Programme (which falls under COGTA). If I am correct, you might want to make contact with Kate Philip who has been the main driver behind the CWP and has some quite interesting ideas about where it can go that might well fit in with your "vision" (DB)

Section Title	Issue and Page no	Comments
Community Colleges in 2030		
Why do we need community colleges?		
Objectives of the Plan for Community colleges to 2030		
Establishing and strengthening the sub-system	Establishing CCIBU within the DHET (p.47)	The current approach is still 'business as usual' in many ways. Structure still seems very hierarchical and bureaucratic – likely to create a lot of red-tape – which will impact on the responsiveness of the system. The current approach is likely to result in a high spend on salaries and infrastructure limiting budgets available for resourcing and capacitating for quality teaching and learning. The plan is unlikely to result in a contextually relevant model that is able to deliver learning suited to already available skill shortages, jobs and enterprise development opportunities in targeted communities (JL)
	Selection of programmes: Community colleges should continue to offer GET where there is demand (p.49)	Do we need to reconsider this in light of the Heher commission proposal about community colleges and the Presidential announcement on free higher ed? Maybe Adrienne's point would be useful here – DBE to take matric and community colleges skills programmes that are not being offered in TVET colleges or part programmes to articulate to TVET colleges (MM)
		We suggest that the fundamental programmes to be offered by Community Colleges: • be standardized and quality assured • include financial literacy in the fundamental programme (SN, ST, CM)
	Use of technologies in community colleges (p.49)	The plan does not make adequate use of Technology to achieve scale and quality Community Colleges are a good opportunity to develop capacity for innovative and increased use and integration of ICTs. This should be an integral part of the system and it must be compulsory for educators

Section Title	Issue and Page no	Comments
		that come on board. There is a need for innovation from day 1 and there are more than enough people on the continent and across the developing world able to provide support and advice in this regard. Nothing definitive/innovative being said about use of mobile learning – the plan is still talking the same language as existing strategies (i.e face to face/blended) but this will stifle the plans ability to widen access, provide support, reduce the need for physical teaching and learning spaces (and their associated costs) and could help mitigate costs of disseminating and sharing learning and teaching resources The plan also needs to interrogate resourcing and consider using Open Education Resources (JL)
	Infrastructure - There must be a physical structure where the college will attend to its main administration and this must belong to it (p.49)	How does one deal with the issue of needing a physical structure if elsewhere it suggests that DHET will not own the buildings? (DB)
	Establishing community colleges in rural areas	If you want Community Colleges to function in rural areas, you need to avoid the unnecessarily strict rules that the SETAs (or at least the HWSETA) imposes in terms of training venues, as venues that qualify are very difficult to find in rural areas (DB)
	Having 27 colleges by 2030	It is ambitious to have 27 colleges by 2030. Maybe we should just aim for pilots for this period (CET Principals)
	Staffing (p.49)	Building the capacity of traditional educators will take too long – a “train-the-trainer” approach with working professionals being upskilled into facilitators is needed. The capacity building approach in the plan is not clear – it is largely still pushing more of the same and there is a need to focus on how best to develop existing local capacity to implement, support and maintain planned interventions using Technology and workplace learning. If the same old approach is taken to build capacity – it will result in questionable quality as the system is already dysfunctional – there are few ‘well qualified educators’ even in the mainstream system. The plan should incentivize existing graduates and professionals as well as retired professionals to enter the system as facilitators, moderators and mentors (JL)
	Some programmes will rely on contract short term staff (p.49)	Much as it is true that permanent appointments should be weighed carefully, the high turnover rate at ABET centres and poorly qualified staffing is partly caused by job insecurity in the sector. This issue should be addressed well if the sector is to play the important role it is mandated to discharge.(UNISA)
		Use of short-term contract capacity/expertise to develop concept will result in loss of institutional development memory and will be expensive (JL)

Section Title	Issue and Page no	Comments
	Establishing community colleges	Community colleges - I strongly support the introduction of this institutional type, but I am very concerned about our capacity on many levels to do this. I would phase this in (delay even) to allow for other aspects of the IPPSET to be implemented first. Pilots and research can continue in the meantime, but I would wait at least five to ten years before taking this forward. I realise this may be politically unpalatable (JK).
		Instead of building community colleges they should work with schools to get accommodation. (UNISA HE CS)
		What determined the establishment of 3 community colleges per province? This seems inadequate and provincial geographies are different and have to be considered. The Plan should relook size and shape of community colleges (Durban HE CS)
		The stigmatisation of PALCs and aspiration for university will seriously hamper uptake of community colleges. A publicity campaign is needed to make community colleges more attractive. It can be useful to use public figures to publicise them, and maybe soap opera stars (Durban HE CS)
		Given the geographic spread of TVET colleges and their location in communities, why are we creating community colleges? Why are TVET colleges not carrying the mandate envisaged for community colleges, especially given how weak the PALCs are and the fact that there is no new money for Community Colleges? (Durban HE CS)
	Governance and management (p.50)	The hijacking of posts by politicians and unions is one of the reasons for the poor outcomes of the school and college systems in the country. Qualified and skilled people should be recruited for this important national imperative; otherwise it is doomed to fail (UNISA)
	Pilots (p.50)	The plan does not draw on existing innovative community learning pilots from NGO's and the Business Community The plan needs to incorporate lessons learned from existing pilots in the community education space to show the importance of contextually relevant knowledge and skills and how these can be linked to existing programmes like the Expanded Public Works Programme. Other examples from the corporate sector such as Harambee (they trained and placed 300 000 youth in jobs in the last five years) would also be useful to guide the approach (JL)

Section Title	Issue and Page no	Comments
	Programmes (p.51)	The plan should specify how it will promote articulation between the Community College programmes and those of programmes offered by other institutions because it is likely that some people will enter the Community Colleges, not only to get certificates, but to be able to access higher education, especially those who may have left school early due to poverty or other circumstances such as teenage pregnancy (SD) The plan does not take advantage of existing skills shortages within the civil service Under the discussion of community education programmes on page 52 additional thinking is needed around skilling up unemployed youth to specifically support civil service functions and improve the quality of local service delivery by skilling up local youth to provide support and auxiliary services at a stipended rate linked to Community works programmes in the same way as they have done with community health care workers. Focusing on education (ICT monitors) and social service sectors to address gaps in education and social development services bringing in the values of volunteerism and community service whilst furthering career pathways (JL)
	Accreditation	The biggest issue for community colleges is that Provincial Departments of Education are still the examination authority for both Adult Education and Training (AET) and the Senior Certificate which demands a seamless collaboration between the two authorities. One of the biggest gaps in knowledge about the work of CETAC is the lack of an accreditation system for community learning courses and articulation with SETA requirements. Courses can only be offered as certificates of attendance, which do not sit well with employers who need competency, albeit on an NQF level 3 or 4 (SU)
	Employer demand	There is a lack of research into what employers need so that training may be aligned to these needs. Greater collaboration is needed between the departments of Social Development and Economic Development and Tourism, Local and Provincial LED initiatives to align community employment capacity with the demand of local and provincial employers. Training service providers who have developed materials on a community college level, struggle to find SETA accreditation while these departments focus on controlling service providers instead of enabling them. (SU)
	Environmental issues	There is no reference to sustainability or environmental issues – critical to sustainable economic growth are green skills If the Colleges are to be visionary and remain relevant it will be necessary to take into consideration global issues around community development i.e. the SDGs, climate change and integrate them into the conversation/ language/actions of community education – must be firmly embedded (JL)
	Curriculum statement	There is no clear curriculum goal statement aligned to the National Development Plan or any other growth

Section Title	Issue and Page no	Comments
		and development targets of the government (JL).
	Programme mixes	Mechanisms needed to ensure “autonomy” to determine own programme mixes in line with available capacity and resources does not result in development and delivery of sub-standard and non-contextually relevant offerings (JL)
	Non credit bearing programmes	How is coordination going to be achieved if community colleges are being established on such a low budget and their programmes are non-credit bearing? (UNISA HE CS)
	Student Support services (p.50)	There is too little focus on mechanisms to support through-put and ensure appropriate matching of students and curricula In terms of how the community colleges will work on page 45 although they have mentioned psycho-social support to students and placement assessments there is a need to include modified psychometric testing or occupational therapy assessments that focuses on a community asset based approach (JL)
	Resourcing (p.53)	How is the Department intends to prioritise funding for the increase of the TVET and Community Colleges - which are both critical in skill development and alleviation of unemployment (SD)
	Community education funding	The plans financing model is unimaginative and is not in line with the multiple opportunities for alternative funding mechanisms presented by the BBB-EE framework and other corporate commitments already in place In terms of financing the Plan is very vague about corporate funding and the reallocation of existing skills levies. Although the plan talks about the National Skills Development Fund it would be good to push them to put in writing something about exploring the BBEEE rating as a mechanism for funding community colleges to be included in current legislation and explore other corporate incentives to fund such as tax breaks (page 53). (JL)
		The Plan should strongly propose the recapitalisation of community colleges similar to that of TVET colleges (CET Principals)
	Monitoring and evaluation (p.54)	There is no mechanism for stakeholder engagement and lesson sharing (JL)
	Partnerships	There is no mechanism for partnership management – government cannot do this on their own (JL)

Section Title	Issue and Page no	Comments
Other Comments on community college chapter	Clarity of terms	More clarity required on “skills development” aspects – eg learnerships and internships (JL) Need for good quality learning resources and ‘learning facilitators’ not ‘teachers’ (JL) A lot said about ensuring access but nothing about ‘quality’ – need to ensure access does not come at expense of quality (JL) Mechanisms will need to be built into model to ensure Colleges stay contextually relevant and dynamic – continually evolving and growing from the ground up... (JL)
	International benchmarking	The idea of Community Colleges to train people who have fallen out of or had to leave the School system has some merit. Considering the very large number of students for which these community Colleges would cater (in principle up to 18 million) there is a need to better understand the nature of the problem and to build on successful international models such as the Community College sector in the USA, and in particular the impact of the Achieving the Dream (ATD) initiative there, in elevating the quality and impact of the sector (UKZN)
	Community colleges should not be proxy for poor basic education	Community Colleges should not be seen as a symptomatic treatment of a much larger problem of the underperformance of general education and training. Yes, Community Colleges should exist to help students who are unable complete secondary Schooling, due to poverty or other circumstances such as teenage pregnancy, but it should not absolve the state from taking measures to reduce the number of students dropping out of school, which should be addressed as a matter of urgency. It is not realistic to expect intervention measures at a tertiary level to reverse the damage of 12 years of (in many cases) ineffective or inadequate schooling (UKZN)
	Financing community colleges	If there is no dedicated budget for Community Colleges, then why is this section included in this Plan? The DHET should signal in the Plan that various stakeholders will still be lobbied to support the various Community College programmes in terms of budget (CT HE CS)
	Establishing community colleges	Each of the proposed components for guiding the establishment of the CET colleges suggests an enormous amount of resources and time to guarantee the success of the project. Hence it is important for specific goals, strategic objectives, and priorities or outcomes of each component to be outlined. We recommend that the authors of the NPPSET follow a similar format as the 2001 National Plan for Higher Education and/or National Skills Development Strategy III in order to clearly articulate the goals, strategic objectives, and priorities of the respective components. Setting and achieving goals should be a critical element of the NPPSET. The NPPSET provides detail of the organisations in the design and delivery of the respective tasks but should be clearer on the specific tasks and responsibilities assigned to each organisation. It is important

Section Title	Issue and Page no	Comments
		that all tasks be put into a sensible order with sufficient timescales, and that start and end dates are clearly identified (HSRC)
	Articulation	It is not clear whether community colleges would be preparing students for admission to university studies and/or whether certain community colleges are to be associated with particular universities, offering preparatory pathways into specific programmes (SU)
	Purpose of community colleges	The NP-PSET should consider the role of community colleges in assisting school leavers who have not passed their National Senior Certificate, or who passed, but without the ability to access further PSET opportunities. There may be a huge need to assist youth >21 to obtain a senior certificate or to improve their matriculation marks as a key matter of articulation (SU)
	Role of TVET and universities in the growth of community colleges	The Plan does not address how universities and TVET colleges can contribute to getting community colleges to function. Before there can be growth in the HE and TVET sectors, the lower levels of education should get more attention, providing proper structure and quality assurance at the community college level (SU).
	CET Plan	The WPPSET is clear in terms of what needs to be achieved in this sector. The NPPSET should be clear about how, by whom and when the strategies and targets outlined will be achieved. There is an attempt at a Plan for the pilot project. This is good. What should be included is what happens after the pilot and how the plan will unfold (SAQA)

Chapter 4: Technical and Vocational Education and Training

Section Title	Issue and Page No	Comments
Introduction	TVET as the cornerstone of the PSET system (p.57)	If the TVET Colleges are the cornerstone, a strategy to communicate this appropriately to the public for a mind-shift from the current belief that only university education is superior is needed. I find this strategy missing in the Plan (SD)
		We must ask ourselves why students have not been turning up for TVET colleges even when education in these set of institutions is tuition-free. The reason is because students generally still see TVET education as less in terms of quality, and also not presenting many job opportunities upon

Section Title	Issue and Page No	Comments
		completion of studies (CT HE CS).
	The growth of stronger TVET colleges will expand provision of mid-level technical and occupational qualifications (p.57)	Are these defined anywhere? Just beware of how use of terms gets latched onto and becomes markers of distinction at some later stage (VW)
	Description of primary purpose of TVET (p.58)	May be worth highlighting this (VW)
	Purpose of TVET	The focus is too much on preparing people for work in the formal labour market. Yet increasingly it is evident that many of the graduates will not be able to find jobs in the formal labour market. So I think there needs to be reference to the role of TVETS in equipping graduates and young unemployed people with skills to generate livelihoods. In the long long long term training for cooperatives and the like may be taken over by community colleges but in the short to medium term I think TVETs should be playing more of a role in this area. I am attaching a paragraph from the draft Mandela Initiative Synthesis Report which I think captures this very well (JF)
	Enrolment	Maybe need some indication of the extent to which TVET enrolments are currently clustered in what called "commerce", but are often quite low-level occupations. Do we know how many of the graduates (if they ever get their certificates...) get jobs? (DB)
	Changing public perception of TVET	On page 56 (second paragraph), the NPPSET correctly identifies the need to expand the TVET sub-system to provide alternative and attractive opportunities for aspiring students. However, throughout the chapter the emphasis is on making TVETs an alternative but not much is said about enhancing its attractiveness. Hence, while the skilling to perform artisanal work in some sectors has become highly complex requiring higher levels of skills, few young people seem to find TVETs attractive enough. How will the low status and attractiveness of TVET for the average school leaver be addressed? (HSRC)
Objectives of the TVET plan	The objective of the plan is to explicitly provide an	Apropos my earlier comment: The qualifications are described as mid-level technical and occupational qualifications, but here we speak of technical and vocational education and training.

Section Title	Issue and Page No	Comments
	implementation framework to achieve White Paper goals of an expanded and strengthened TVET sector providing quality <i>technical and vocational education</i> and training that prepares students for the world of work (p.58)	Does the latter lead to the former. Is the distinction between vocational and occupational deliberate? (VW)
	The immediate focus will be on developing and introducing new occupational and higher certificate qualifications and conducting intensive staff development and support materials development, which will stimulate and consolidate the role of SAIVCET. Focus programmes should also include programmes in the business and hospitality areas and not just in the engineering-related qualifications (p.58)	• Has the role of SAIVCET been explained earlier? • Why is the point about engineering related qualifications made here? Is there a suggestion elsewhere that the focus should only be on engineering? Surely the point should be that the types of programmes offered should be keenly attuned to dynamics in the labour market and should cater for the spread of economic sectors as well as public and social categories of work... something like that. Maybe the point is actually covered by the next sentences (VW)
	The immediate focus will be on developing and introducing new occupational and higher certificate qualifications and conducting intensive staff	Should the immediate focus not be getting the colleges working efficiently? Or will this focus help to do that? I also wondered whether there should be a discussion of ECD and child and youth care worker qualifications. The latter is an accredited qualification but currently delivered by NGOs (where I personally think it should stay) but for ECD the TVET colleges have come in and government departments now want to fund them for the qualification rather than the NGOs, although the latter

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	development and support materials development The immediate focus will be on developing and introducing new occupational and higher certificate qualifications and conducting intensive staff development and support materials development ... (p.58)	probably deliver better training. Both of these are areas where government has said the numbers must expand rapidly, and both are mainly held by women. (One oddity is that some years ago Minister of SD declared social work a scarce skill. This is widely quoted within SD. However, it is NOT on the official government scarce skill list. (DB) Support from the branch for occupational programme development (TVET SS)
Policy imperatives for the TVET sub-system	Section on policy imperatives	This section seems a bit unfocused. Different paragraphs don't link up and seem unclear in terms of what this means as a policy imperative. I would suggest some restructuring that perhaps summarises strengths, weaknesses and policy pressures (VW)
	Countries with strong TVET systems have good relationships between <i>industry</i> and TVET institutions, and TVET plays a particularly important role in directly linking intermediate technical education to the labour market. (p.58)	Consider using employers instead of industry... although then you have a problem with entrepreneurship advocates (VW)
	The South African TVET system is complex and wide-ranging and has a long history, described elsewhere (p.59)	What's the point? (VW)
	TVET colleges are fairly accessible because of their geographical spread with multiple campuses, and core programmes (NATED	Too many issues in one (VW)

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	190/191 and the NCV) funded by government, with SETA funding dedicated to occupational and skills development programmes (p.59)	
Objectives for an expanded and strengthened TVET sub-system	The overarching objective in the strengthening of TVET colleges is the development and delivery of mid-level qualifications that are relevant and responsive to the needs of school-leavers and the demands of the world of work. (p.59)	Is it only school leavers? What about youth and older people wanting to access work opportunities, or even people looking to change work pathways? (VW)
The Plan for expanding and strengthening TVET	TVET Qualifications (p.61)	The way in which the TVET qualifications are presented (Table 2) is very useful, perhaps something similar could be done for the other sub-systems? A similar presentation will help the reader and assist with integration. The tables could also be moved to an annex with only a summary in the text (JK)
	Foundational programmes	Notes on Foundation Programmes at TVET colleges seem to be oblivious of lessons on these programmes at universities. We should be careful not to transfer what has failed at university level, to the TVET colleges (CT HE CS)
	TVET and community college programmes	We recommend that the fundamental learning programmes to be offered by TVETs and Community Colleges be addressed in detail in the Plan so as to avoid any uncertainty as to their nature (SN, ST, CM)
	QCTO Certification	We recommend that the Plan address the qualifications to be certified by the QCTO and that it be made clear that these qualifications will be at Levels 4-6 of the current NQF. It is not clear - • How and when NATED programmes will be phased out

Section Title	Issue and Page No	Comments
		- When NCV programmes will be re-designed and who will have responsibility for this - When artisan programmes (COS and Dual programmes) will be introduced by TVETs and who has responsibility for this process (SN, ST, CM)
	TVET Qualifications	TVETs should not offer all NATED and NCV programmes initially. Offerings should initially be based on market needs and employment trends in the areas served by the relevant TVET (SN, ST, CM)
	TVET qualifications	We suggest that the immediate focus should not be only on developing and introducing new occupational and higher certificate qualifications but should include reviewing and developing existing qualifications. (SN, ST, CM)
	Foundational learning programmes (p.61)	I think we need more clarity about the purpose, content and length of the FLC: is it an entry-level requirement for a course towards an occupational qualification or an exit-level part-qualification that has to be obtained in order to complete the requirements of an occupational qualification? My preference is for the former. I think the ideal would be for all applicants for occupational qualifications who do not already meet certain requirements (e.g. Gr12 with maths and English for engineering programmes) to write an FLC assessment. If they pass, they can proceed immediately into the occupational course. If not, they have to do an FLC course broadly orientated towards their chosen vocation and then re-sit the assessment in order to demonstrate that they are ready for the occupational course. This should help to reduce the astronomical failure and drop-out rates in most TVET programmes. My gut feel is that such an FLC programme need not be longer than 6 months. Compelling learners already in occupational programmes to do the FLC as a requirement for graduation (as is currently the case) seems me simply to add to learners' burden of study without doing anything to make them more effective learners (KD)
	Streamlining 3 streams model and NCV	The urgency of reconciling the DBE's intentions with the DHET's cannot be overemphasised. I know the TT cannot pre-empt the outcomes of those inter-departmental discussions but it might be just as well to flag that some of the DBE's reflect a completely different understanding of vocational and occupational training from the TT's. Moreover, if implemented, they will make some of the strategies proposed in the PSET plan redundant (e.g. retaining the NCV in TVET colleges) (KD)
	Table 2 – occupational qualifications	The varied times taken by students, especially those involved in workplace training, must be considered in the funding models used for these qualifications. Funding models need to be cognizant

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		that some students will take extended periods for acquiring practical skills, which is not a 'failure' as is the case in exams, or there may be workplace disruptions that extend the predetermined learning/training period. The problem then is who bears the cost of these extended periods given funding is always locked into a fixed period – The plan needs to indicate that flexible funding is needed to cater for the those in workplace training (AS)
	Table 2 – NCV (p.62)	A problem with referring to the NCV as if it is one thing is that it doesn't differentiate between the different versions. Some are quite well aligned to work, others not. My own sense is that some would want to be retained, whilst other strands can be merged with the schooling VET stream (VW)
	Table 2 - NCV	There's quite a lot of repetition in this column (VW)
	Table 2 - The NATED programmes, will be absorbed into the National Occupational Certificates over time, as they are developed.	Any position on the majority of the NATED students currently in the business studies stream? (VW)
	Learning pathways	The objective for <i>a single, coordinated post-school education and training system</i> requires discussion of 'pipeline' and the creation of a single coordinated system to ensure that all potential learners are catered for. However, the plan does not clearly articulate the education flows/pathways and answering the question of how this feeds into the refocussing of basic education towards a three stream model: The diagram illustrates a three-stream model. It starts with 'School' leading to 'Grades 9', '10', and '11'. From 'Grades 11', there are three pathways: 'Vocational Pathway', 'Technical Pathway', and 'Academic Pathway'. The 'Vocational Pathway' and 'Technical Pathway' both lead to 'NQF 4 Qualifications'. The 'Academic Pathway' leads to 'TVET'. A dashed line separates the 'Academic Pathway' from the 'Vocational Pathway' and 'Technical Pathway'. A blue arrow points from the 'Academic Pathway' to 'TVET'.

Section Title	Issue and Page No	Comments
		Delay HEI Progress Career awareness at most schools is lacking but must be present at all schools if policy objectives are to be achieved. (SN, ST, CM)
	Learning Pathways	All education pathways should be identified and explained. This will make it clear where learners will fit into the system. The roles of the DHET and the Department of Basic Education overlap. Currently learners who do not gain access to higher education enrol at TVET colleges usually without consideration of their career paths. This contributes to low throughput rates (SN, ST, CM)
	Table 2 – higher and advanced occupational certificates	Even where arrangements are in place for colleges to offer HCs in partnership with universities, this is failing to gain traction because student funding hangs in an abyss - they are funded neither by TVETCs nor by Universities. This needs to be flagged as a major impediment so that it receives the required attention in making funding decisions, particularly in Branch U – (AS)
	Table 2 – There are currently a number of partnerships between universities and TVET Colleges to offer level 5/Higher certificates at public TVET colleges.	But the majority of these are not occupational, but rather about access. So the current partnerships are not a useful model (VW)
	Table 2 – Foundational Programme	Reference is made to the fact that the Foundation programme must not be pitched at a particular level. This will have to be the case, at least initially because the curricula are nationally developed. As colleges become competent in managing the programme, they will use and modify it to meet a variety of student needs. The present model allows them to manage the whole QA value chain. Lecturer development will also play a big part in colleges using this curriculum to its full potential, through internal adjustments (AS)
	Table 2 – scaling down on NATED programmes	The plan suggests that the NATED programmes be absorbed into the National Occupational Certificates as they are developed over time. Since the NATED programmes currently provide the

Section Title	Issue and Page No	Comments
		best success rates and evidence of their value is notable in the labour market, any down-scaling of NATED programmes should be done cautiously (HSRC)
	Reducing external examinations (p.67)	The strategy to reduce excessive external examiner is needed, not only for TVET Colleges, but universities too (SD)
		The Plan notes that the external examination process needs to be reviewed and consolidated for TVET colleges. The reason for this is given as “internal examination will allow lecturers to develop their own material and focus more on diagnostic testing”. Diagnostic testing is very important in all education sectors, but the need for this form of testing does not render external examination unnecessary. There is room for both in the system. This practice helps ensure consistent quality across all institutions and helps bring in new ideas which serve as a form of training for the academic staff. External examination should not be sacrificed for the sake of “streamlining” the examination process (UKZN)
	4 th Industrial revolution	The Plan is silent on the 4 th industrial revolution. The Plan should foreground the new world of work. The system should produce graduates for the new world of work and this needs to be clearly outlined in the Plan (Dr Parker suggested that this should be brought into the contextual chapter. Also entrepreneurial project in higher education should be elaborated on) (Durban HE CS)
	4 th and 5 th industrial revolution	We must begin considering how to transform education and training to respond to 21 st century needs. An omission from the White Paper is a policy on education for the 21 st century. Such a policy must address teaching and learning suitable for the acquisition of the skills and attitudes necessary for the 4 th and 5 th industrial revolution... (SN, ST, CM)
	Technology and its effects on the WoW	The Plan should consider how computerisation and automation will impact employment opportunities. The Plan should look less at employment opportunities and consider a new way of being. Proactive planning is needed (Durban HE CS) (Durban HE CS)
	Utilisation of PSET provisioning by	How do we ensure active participation of industry so that they train staff members through the PSET

Section Title	Issue and Page No	Comments
	industry	system? (Durban HE CS)
	TVET Curriculum	Is the curriculum of TVET colleges responsive enough? (Durban HE CS)
	University/TVET linkages	Linkages between TVET colleges and universities is not clear. (Durban HE CS)
	Articulation of Plan with TVET Branch	The key areas in the document align to the position taken in the draft <i>TVET Qualifications Framework Policy</i> document that will soon be out for public comment (AS)
Other points	TVET colleges have also been offering various skills development programmes and short courses. These will continue to be offered based on demand but will not be part of the core qualifications (p.66)	Does this mean the categories listed above? (VW)
	Within occupations, criteria for awarding the status of Master Artisan or Master for an occupation will be agreed with relevant professional bodies or associations (p.66)	But who does the awarding? The professional body or some state entity? (VW)
PQM and enrolment planning	Given the low enrolment in <i>occupational programmes</i> , the shift to offering more occupational programmes is going to be a significant one and the transition has to be managed	Needs to be terminologically clear and consistent throughout. What is this actually referring to if we say that all programmes should be directly focused on work? Do you just mean the OC and HC and AC levels? (VW)

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	carefully to minimise disruption to the system (p.67)	
	Meaningful programmes that are responsive to national and regional economies (p.67)	Will there be a provincial or regional level PQM process across a number of colleges? i.e. will the DHET regional offices play some coordination role like in the WC? (VW)
	Funding of programmes through the SETA funds and the NSF (p.67)	How will this be determined? Possibly along the lines of the HEIs? (VW)
	Streamlining examinations system and reducing the number of external examinations (p.68)	This is also really important in the context of allowing for some curriculum responsiveness at local level. Making choices about what is assessed internally is a way of emphasising the local context (VW)
Building the capacity of the sub-system	Introduction of Centres of Specialisation (p.70)	Maybe we need a few lines describing these. They appear out of nowhere in the Plan
	Use of the term catalytic funding and whether this should be used in the plan	Will check and get back on this one ... (TT)
	Student support services	Low throughput rates should be addressed through career guidance and not just through student support. The provision of career guidance is clearly an objective but little attention is provided on implementation of this objective (SN, ST, CM)
	Staffing and staff development (p.68)	I may have missed this, but the role of SACE in relation to TVET lecturer professional development and licensing is a critical gap at the moment. Legally this is a SACE responsibility, but it has not been implemented. The possibility of SAIVCET or another, even new body, to take this up should be seriously considered (JK)
		I would add here that, in addition to the upgrading of existing TVET college staff, two other strategies

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		should be pursued: 1. A shift in job descriptions and employee specs, to focus on the recruitment in future of qualified artisans (This is about to be piloted through the Centres of Specialisation initiative and some excellent work has already been done on thinking through the HR and contractual implications for DHET and the colleges) 2. Staff exchanges between colleges and industry, which the international research literature suggests is the most efficient and effective way of getting the right expertise to the right learners a.s.a.p.. (SSACI actually developed a manual on this for DHET, which I attach in case you want to get some pointers on the practicalities of this in the SA context) (KD)
	More focus on Staff development required	There are a few reasons why the Plan should devote more time to outlining the goals for capacity building of staff in the subsystem: • <i>Increased responsibilities with regard to examinations</i> (cf. page 67). As noted in the draft NPPSET: “Changes in qualifications offered will impose new demands on the examination system and the changes provide a good opportunity for the Department to review and improve the examination system, a process already under way. The strategy is to streamline and reduce the number of external examinations that the Department is responsible for so that college lecturers do not only wait for Departmental exams but also get a chance to develop diagnostic and continuous assessment tests that they can use to improve teaching and learning.” • <i>More responsibilities with regard to management of finances</i> (cf. page 72) will be given to colleges: “TVET College budgets should include all components that are key for developing the capacity of the sector - staffing, student support services, programme development, LTSM, examinations, information systems, evaluation and research, capital equipment and infrastructure.” (HSRC)
	Some students are recruited from TVET colleges who proceed to university and come back to the sub—system (p. 69)	I’m not sure how true this is. My sense is rather that university students are recruited directly from UoTs and universities. So few have gone to university from colleges that this seems unlikely to be a large part of the picture (VW)

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	Strategies for staff development: Establish Regional Support Teams (p.70)	Regional Support Teams aren't explained. I think this is key strategy (VW)
	Role of SAIVCET	It seems to me that the roles and functions assigned to SAIVCET cannot possibly be discharged by SAIVCET as it is presently structured. The FET Act, the White Paper and the report of the 2013 SAIVCET TT all envisaged it as an institute jointly funded and governed by DHET and industry. Since then, it has metamorphosed into a couple of empty desks in a sub-department of the TVET branch of a government department (DHET). Most business-people are unaware of its existence; those who have heard about it neither know nor care what it is doing because they have no voice in it. Meanwhile, DHET has announced plans to turn the <i>ad hoc</i> National Artisan Development Advisory Body into a statutory body, to do for the artisan trades what SAIVCET was supposed to do for all occupations. This is a classic example of duplication of effort, funding and entities, without actually addressing the core issue - namely, how to get industry actively involved in TVET across the board. Any chance we can direct DHET back to its original ideas about SAIVCET, which at least back in 2013 evoked some enthusiasm from organised business? (KD)
	Explicitness about key institutions	In order to strengthen college responsiveness and establish better linkages with the country's economic and social development needs, much weight has been placed on two units, namely the South African Institute for Vocational and Continuing Education and Training (SAIVCET) and the Skills Planning Unit within the DHET. However, no concrete timelines and activities towards their establishment and functioning goals have been outlined (also see our general recommendations above). Many improvements in the overall functioning of the PSET system will rely on the support of these two units for implementation. We would thus advise that the draft NPPSET should present the chronological order of events within the implementation framework more explicitly. According to the draft NPPSET, SAIVCET should be operational in 2018 and the support for identifying skills demand should come from the department's unit for skills planning. As we are in March 2018, it is highly unlikely that this will be the case; this should be realistically factored into the overall planning (HSRC)
	Governance - Council powers	The Act establishing TVET colleges needs revisiting. Councils do not have any power at all. (WHO?)

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		There is support from the branch in working on improving capacity of Councils (TVET SS).
		There's a real tension in the system between the role of the councils and its power and the role of the DHET. This needs to be resolved – does the plan propose a more centralised and coordinated system or a more decentralised localised semi-autonomous college? (VW)
Modes of delivery and technology	Putting modes of delivery and technology together	I think putting these two things together mixes two really important issues and links them purely because of technology. One is about how colleges teach (mode of delivery), the other is what resources are required to expose students to authentic work contexts. The third issue about bandwidth is also distinct from the other two. (VW)
	More attention on e-learning and blended learning	Improved internet connectivity is envisaged at colleges by means of linking colleges to the South African National Research Network (SANReN). This is one of the main obstacles in information systems support between colleges, campuses and the DHET. While this is encouraging, we feel that aspects such as e-learning or blended learning could have received more concrete focus in the NPPSET as these are critical methods to engage and include generally more marginalised social groups. In the interest of better public access to internet-based educational resources, the NPPSET could also pronounce on DHET plans to engage with the high cost of privately paid for internet access/data (e.g. by petitioning ICASA and/or negotiating student rebates for data purchase from major cell phone companies) (HSRC)
	Colleges will at the minimum have the technologies being used in the workplace (p.71)	Hmm, not sure that this is ever possible (VW)
	Centres of specialisation (p.71)	Has this been explained? I may have missed it earlier (VW)
Funding and resourcing	Reference to fiscal funding and whether it is fine to talk about fiscal funding	I think you can refer to State or Government funding (TT)
	Funding by types of qualifications	Many if not most programmes in PSET sector require workplace learning – so make linkages by type

Section Title	Issue and Page No	Comments
		of occupations, NOT levy vs fiscus. If programmes do not require workplace, then fine, fiscus only (AB)
Monitoring and Evaluation	Indicators	We suggest that the key metrics to be monitored and used as the basis for TVET management are specified up front and those that should be added in priority are: ○ No. of students graduated within time (or within time +1) ○ % of students graduated of initially enrolled within time (or time+1) ○ Students employed within 3 months of finalising course (SN, ST, CM)
Other comments	Differentiation	A discussion of differentiation in the TVET sub-system is weak in the Plan yet there is a lot happening. The differentiation thread should be run across the entire Plan (USAf TTS) While differentiation is prominently referred to in the HE subsystem, it is curious that the TVET subsystem is treated without regard to the different histories, capabilities and contexts that inform different college's strengths and weaknesses (HSRC)
	Relations between TVET Colleges and universities	There should be synergy between HE and TVET which should be promoted strongly in the Plan. (UNISA HE CS)
	TVET Chapter organisation	We suggest that the TVET plans be divided between employed students (employer enrolled) and college enrolled students and for the two plans to leverage off one another. Within this would also be critical to define the employer as the client and put together detailed plan of how to build and fulfil client needs (SN, ST, CM)
	Transition	Drawing on an analysis of twenty years of restructuring in the TVET subsystem by comparing changes in programmes, policies, or projects aimed at transforming colleges, Paterson highlights how having a broad range of interventions may interfere with each other, causing a reduction in effectiveness. ¹² Based on this research he cautions against too many and rapid changes, especially if condensed into too short a time could ultimately become counterproductive as it puts TVET Colleges under severe pressure without the required support (HSRC)
	TVET and PPP	Based on an extensive review of successful TVET systems globally, as well as those on similar development trajectories as South Africa, Kruss et al argue for strong PPPs within the TVET system. ¹⁴

Section Title	Issue and Page No	Comments
		These partnerships offer valuable support in strengthening the capacity of TVET Colleges with regards to funding, training and governance. The Plan seems silent on facilitating PPPs (HSRC)
	Research opportunities	A few opportunities for research, emerge from our evaluation of Chapter 4. Particularly conducting a study on demand and supply of lecturers to identify scarce and critical technical and vocation skills (pg. 69) and monitoring and evaluation activities towards establishing implementation frameworks (pg. 75) are noteworthy. ESD has built up relevant and cognate expertise in these areas of research and could, in partnership with other stakeholders and institutions, contribute to filling this research gap (HSRC)
	Proposal for an integrated TVET system	The fundamental institutional challenges in the TVET/CET system (NOT colleges only, also workplaces) are not resolved – we remain in the Plan with a separate NSA, a separate QCTO, a separate SAIVCET, a separate INDLELA and no <u>systemic place</u> where the partnerships between TVET/CET colleges and SETAs can be formally streamlined. I know that the White Paper itself did not resolve this problem, however I have personal experience of working intensively in this field since the late 1980s – 30 years! – and in that time I have sat in uncountable meetings where ‘boundary negotiations’ (sometimes called ‘partnerships’) have been held – usually linked to ‘silo’ claims, with beneficiaries (employers as well as learners) confused and frustrated because different prescripts are issued by each. Surely the White Paper process is the right time to at least state our intent and lay out a process to transition to a more integrated system? Many actors in the field have shown that there is a continuous value chain from qualification development to curriculum and trade test (external summative assessment) development to learning material development, provider accreditation and then to support systems (including securing workplace learning opportunities for occupational learners). It makes little sense for these processes to have to jump over so many institutional divides where invariably contestations take place and time is lost (so response times are impossibly slow) – it should be more like a relay race where the baton is handed over along a smooth track. Enormous efficiencies can also be gained with single ITC, HR, financing etc arrangements rather than these being replicated for each institution. Proposals: the Plan should either integrate this idea OR add it as an possibility to be further consulted.

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		- In the meantime I propose that a DHET Working Committee be established consisting of SAIVCET, QCTO, NSA, TVET Branch, Skills Branch (including Indlela, NAMB and NSF) representatives where the proposal is refined before being consulted with all the Boards of stakeholders that govern these various institutions (where appropriate) and then more broadly of course. A champion needs to drive the process. - In this space 'apprenticeships' should be more broadly defined (beyond engineering, across levels and the National Occupational Pathway Framework, and including Modules of Employable Skills for CET) and become the anchor of this system. (AB)
	Planning for TVET	The Plan should pick up on strategies that are dependent on central planning, for example, TVET lecturer development cannot happen without universities developing qualifications so something like this needs to be coordinated at planning level.
	TVET Chapter	Chapter 4 further outlines a vision and further strategies for the TVET sector which goes beyond what is in the WPPSET. This is not helpful as it does not provide a Plan on how the WPPSET should be implemented (SAQA)

Chapter 5: Higher Education

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Introduction	Introduced as a chapter of the Plan (p.75)	Note - Address consistency. The CET and TVET chapters are called the CET Plan and TVET Plan and this a chapter of the Plan. I prefer this to the CET or TVET Plan as my comment in CET chapter suggests (MM)
	The NPPSET replaces the NPHE	The chapter posits that the draft national plan replaces the 2001 National Plan for Higher Education (NPHE). However, it does not assess and evaluate whether the outcomes linked to the policy goals and objectives outlined in the NPHE, and which in broad terms remain the same, have been

Section Title	Issue and Page No	Comments
		achieved. Such an assessment should be the point of departure for the draft plan. The latter cannot assume that it is being developed on a <i>tabula rasa</i> , a blank slate. It must build on what came before, which requires assessing what, if anything was achieved; identifying new outcomes to build on the achievements; what was not achieved and why; and address ongoing shortcomings and weaknesses, including adjusting policy goals and objectives and the associated outcomes, strategies, activities and time-frames in the light of changed circumstances (AE)
		What lessons have we drawn from the 2001 National Plan in developing this current Plan? We must be careful not to be blind to the “faultlines” that guided previous plans. There is also a need for clarity on the literature and practice that informed this document? What makes it a uniquely South African document? (CT HE CS)
		There is need for the Plan to start with a sober assessment of the current state of affairs in the PSET system and what achievements have been made to date, and gaps remaining to be addressed. The 2001 National Plan for Higher Education (NPHE) would be an appropriate starting point for such an evaluation in the case of this sub-sector and beyond, as some of its outcomes relate to the whole sector (HSRC)
Strategic Objectives	A purposefully differentiated public higher education system is essential for the sustainable development of public universities	And other higher education institutions? (VW)
	public higher education institutions (p.79)	Check for consistency between usage of public HEI and public universities
	The White Paper recognises the critical role played by universities in producing knowledge in support of social and economic development. It is this area of work that distinguishes universities from other kinds of post-school	All universities? Is it possible to be a university that is first and foremost a teaching institution? I would argue for that, but perhaps we want to call them something different... (VW)

Section Title	Issue and Page No	Comments
	institutions (p.79)	
Proposals and strategies for strengthening higher education	Differentiation framework	On differentiation, it appears that the DHET is planning to play a very direct role. The meeting recommended that the Department develop an enabling framework to guide institutions in making choices on what programmes to offer, or they may be conflict (MMM)
		Care should be taken that institutional differentiation does not result in the ranking of institutions. If this is not done, institutional differentiation can easily perpetuate social and economic inequality (MN)
		Included in the conception of a differentiated HE system should not only be all public HE providers but also private providers. For the purpose of improving the data available for system-wide planning, it would be immensely useful to require private higher education institutions to report their student (and staff) figures, as well as knowledge outputs, in a format akin to HEMIS (HSRC)
		The idea of purposeful differentiation of universities is important, but factors such as international rankings as drivers of the current situation should be addressed. Perhaps there should be strategies to incentivise universities who have adapted their programmes to their local/ regional needs e.g. rural universities versus research-led universities (SD).
		We agree fully with following statement: <i>a differentiated public higher education system is essential for the sustainable development of public universities, for appropriately targeted resource allocation to help develop the capacity of public universities and the quality of higher education, but also to ensure a diversity of appropriate opportunities for young people leaving school</i> (SN, ST, CM)
		We support the clear identification of each HE institution's identity, some as undergraduate universities with excellence in teaching and learning and scholarship and some as research-led universities with nationally and globally acknowledged areas of expertise (SN, ST, CM)
		The draft plan proposes mandate and mission differentiation linked to the PQM. This is no different from what was proposed in the NPHE. However, there is no assessment of the PQM process, including the challenges in implementing it. It seems clear that the PQM has not been successful in ensuring institutional differentiation – the most glaring evidence is in relation to career-oriented diploma programmes, which have seen a fairly significant drop in enrolments. If this is the case, why was it not successful and what would be done differently in future that would ensure that the PQM process results in institutional differentiation along the lines proposed (AE) The Plan takes us far in terms of differentiation. There should be an analysis of what has happened

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		with the differentiation framework, because a PQM system was introduced which is open to political manipulation. PQM has not achieved what it was meant to achieve. There is need to revisit how PQM can be done. Analysis can be put in the diagram or a technical report (USAf TTS)
		The rewards for research and teaching should be balanced so that quality of teaching does not suffer. In this regard, the Plan should not only address differentiation between institutions but also differentiation within institutions (UNISA HE CS).
		We are concerned that allocation of a clear identity to every university may be constraining and not in the national interest. For example an undergraduate university may have staff member who is an acknowledged expert and whose research is internationally recognized. A flexible approach to differentiation is, therefore vital. (this may be implied in the Plan – ‘Differentiation will be responsive to the contextual realities of institutions;’ (page 81)
		The Plan states that the ‘Department (DHET) will arrive at formal agreements with each institution, setting out its distinct mission and scope of activities’. We believe that this step may be unduly autocratic but acknowledge that it may be necessary to ensure that there is not a tendency for ‘research creep’ (SN, ST,CM)
		The Plan does not make it clear how the differentiation agreements will be monitored? (The Plan actually indicates that there will be a Plan developed for this) (UNISA HE CS).
		Differentiation is trying to perpetuate the inequalities of the past by stopping some institutions from offering some courses – (Note: Is the concept not explained well enough? Or is it just a matter of poor reading). (UNISA HE CS).
		The Plan does not address rankings and the competition among institutions and the implications of this for the sub-system. (UNISA HE CS).
		The Plan should give an overview of what the prevailing status quo is in relation to mandate differentiation and how this is different from the required, before providing the framework (Durban

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		HE CS).
		We should re-examine our planning assumptions and avoid falling into the trap of past mistakes as we finalise the Plan e.g. when we talk about repurposing campuses we must ask ourselves if these campuses are products of mergers? Would repurposing campuses built on a weak frame/base lead to success? (Durban HE CS).
		Community engagement needs to be structured in order for it to have any impact. The institutions should identify local challenges and map programmes in each region and the Department should provide resources as part of the differentiation framework. Currently it is left to universities and some control is needed. (Durban HE CS).
		There is no specific mention of post-secondary institutions e.g. nursing colleges. There is need to know what falls in this category. (Durban HE CS).
		Private provision has evolved in the past 10 years. One of the strengths of private providers is their ability to respond to the needs of students who do not qualify for the university diploma – level 5 and 6. They provide vocational career focused qualifications. Privates are very good with online learning and the Plan should consider the relationship of private providers with the Department as they constitute an important part of the differentiation of HE. (Durban HE CS).
		Much more is needed on private provision and how it can be steered in a differentiated manner (USAf TTS)
		Missions and visions should indicate the kind of graduates that the institution will produce to avoid producing unemployed graduates. (Durban HE CS).
		Community engagement should be based on an assessment of the catchment area so that community engagement programmes change the lives of that community. Differentiation is required in community engagement activities. (Durban HE CS).
		A one size fits all approach to infrastructure does not work. Look at differentiated way of funding for

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		infrastructure. Infrastructure is also linked to success so infrastructure must be developed where enrolments have to grow. (Durban HE CS).
		Restructuring is needed of what institutions must research, there should be a more Afrocentric research agenda. (Durban HE CS).
		Some common modules for transformation are needed for all universities so that transformation efforts are systemised instead of leaving it up to each individual university. (Durban HE CS).
		With respect to the “differentiation” section, there is concern that universities especially UoTs will be shifted to produce qualifications for jobs that do not exist (CT HE CS)
		Do not mention UNIVEN and UNIZULU by name in the Plan (CT HE CS)
		Institutional differentiation is likely to be perceived as being hierarchical especially in the Higher Education sub-system. We are not certain how the policy could allay fears about particular institutional types being restricted to offering particular qualification types (DUT). <i>Cf. draft NP-PSET page 81:</i> The size and shape of individual institutions and the HE system as a whole may increasingly be informed by resources other than that of government; will public HEIs have the freedom of self- or partial-determination if they become less dependent on government resources? (SU)
		<i>Cf. draft NP-PSET page 82:</i> To what extent should geographical location play such an important role, e.g. in situations where niche research foci address national and international needs or where the mode of delivery is technologically mediated? (SU)
		The nature (and type differentiation) of "Higher Education Colleges" versus "University Colleges" and the potential for collaboration between such institutions and Universities of Technologies and Universities within a region, could be unpacked in more detail, in particular the opportunities offered through the possibility of "foundational learning programmes which are not associated with a level on the NQF" to broaden access to particular programmes (SU)
	Relationship between the stated missions and the practiced missions	It will be interesting to see how the “mission as stated and mission as practiced” (Barnett, 1997) will be aligned in the light of the NPPSET, as the plan seems to emphasise a move towards more State input in the directions individual universities take and more overall control over the university sector as a whole focused on efficiency, effectiveness and economic sustainability – which has a direct

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		bearing on <i>fund allocation</i> . The NPPSET speaks about achieving a balance between accountability and autonomy, with the role of DHET as that of “regulation and oversight” (p. 97) whilst deepening the self-regulation of institutions. However, the plan itself seems to spell out more (rather than less) State control over post-school institutions in general, including universities (LF)
	Ways of purposefully encouraging institutional differentiation by means of agreed-upon performance indicators that reward universities, UoTs and colleges for being true to their mandates and missions, without discouraging innovation and creative exploration of e.g. new knowledge markets, open learning, etc. (<i>cf. NP-PSET pages 81-82</i>)	We are concerned that the list of “discernible identit[ies]” is offered as a set of discrete options, while an institution such as Stellenbosch University would like to position itself not only as a “research-led universit[y] with nationally and globally acknowledged areas of expertise”, but also as a university that strives for “excellence in teaching and learning and scholarship” (SU)
	Process for driving purposeful differentiation	Universities should be given the opportunity to self-identify with specific research and innovation missions related to local (regional) and national development areas and the international development agenda – taking into consideration current strengths and emerging strengths, as well as assessing what will be needed for the future (SU)
		The retention of fundamental (basic) disciplinary research should be a high priority, as it is pivotal to addressing future societal challenges (that we may not yet know about) (SU)
		Academic freedom as a principle point of departure should be applied throughout (SU)
		Where institutional research missions are to be adapted to adhere to a new framework, an incentivized (“carrot”) approach rather than a punitive (“stick”) approach should be followed, with sufficient adjustment time allowed for attracting academic researchers to new (multi-, inter- and trans-disciplinary) research areas to which they can contribute from their own disciplinary background and personal interests (SU)
		Research-intensive institutions support an immense variety of research foci across many fields and

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		disciplines, all with the potential of contributing to a particular academic field and/or major societal challenges in the short, medium or longer term. If the process is rushed, and the proposed formal five-year agreement with the DHET is too restrictive in terms of institutional mission and scope of activities, then serious damage could be done to the research and innovation endeavor of the sector as a whole – and may lead to the loss of highly skilled academic capacity (SU)
	Broad tracks of HE programmes - Career-focused qualifications (p.81)	Why was this term chosen rather than vocational? And how do these differ from professional quals? The B.Eng example has the same characteristics as the professional categories. I made this point in the 2018 SAQA lecture which I will send you. I would strongly advocate for a single category of professional and career focused programmes that vary across levels. This would also align with the idea of occupational quals that appear in the TVET section. These two sections have to be better aligned (VW)
	Text box on institutional mandates (p.82)	I don't think that this is very clear or particularly accurate. And I think that private HEIs are in many ways differentiated in terms of market dynamics and not programme focus (VW)
	The issue of binding agreements between DHET and universities, on mission and scope of activities	The most concerning issue in this chapter is the binding agreement – it seems to me to undermine the institutional autonomy of institutions. I can't work out the rationale for including all the different elements (distinct mission, scope of activities, enrolment planning, etc.) into a binding agreement with institutions – in know the document states that it is to integrate planning, funding and monitoring processes, but it seems like an instrument/ measure that may limit the scope for responsiveness (both opportunities and threats) on the part of universities to their specific contexts (MB)
		Nothing is mentioned in the document about the Department of Education's central and coordination role in the document. There is the need to clarify the coordination role of the Department of Education in this area as it appears the sector ministries or departments will be responsible for these to avoid any conflict situation between them (UNISA)
		How will the DHET enforce differentiation if universities resist it? Imposed decisions are needed to

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		achieve differentiation. The Plan is not rethinking the system but retrofitting. Differentiation is being framed within existing frameworks and not being reimagined and this can be constraining. If we want something new we have to create a new framework (USAf TTS)
	The Department will also determine the sanctions (p.82)	Does the plan not have to indicate what the sanctions can be? (VW)
	Considerations for institutional engagements - National and regional development priorities (including research & innovation priorities) and interventions to address the needs of disabled students and staff (p.82)	Does this refer to a supra or sub set, i.e. is a region within SA or within SADC? It should be recognised that SA universities have a wider role beyond SA. (VW)
	Clear rules of engagement regarding evolutionary transitions across the broad institutional types will be put in place, including a framework for consultation and approval by the Department (p.84)	This needs to be thought through across the sectors because some TVET colleges may morph into HE Colleges (VW)
	Specific strategies will be developed to promote and support greater levels of system and in particular regional collaboration (p.85)	It's striking how much in the plan is about developing mechanisms and strategies. It would be good for the plan to be more specific on some of these. What sort of strategies are envisaged (VW)
	Ongoing analysis of private institutions will be necessary to ensure that up to date	I think that this issue needs more detail (VW)

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	information is available on the PQMs and enrolment growth of private institutions (p.85)	
	NSFAS and DHET to ensure that there is no financial exclusion (p.90)	The governments free tertiary education for the poor is good but its sustainability should be considered carefully as the other competing societal needs may not allow for free tertiary education. How the cost-sharing can be applied sustainably should be explored (UNISA)
	Review of CHE (p.96)	A review of the CHE? Not sure I agree. The CHE functions well and disrupting the work of this body is not recommended when many others parts of the system are not stable (JK).
	Internationalisation (p.104)	Internationalisation - this should not be limited to scholarships and exchange programmes. I would argue that collaboration in areas of research, policy, implementation, etc. is far more important (JK).
		Though the NPPSET is obviously a national concern and focused on national post-school issues, South Africa remains one of the preferred destinations for many undergraduate, but particularly also postgraduate, students from other African countries. In addition, there are many adult learners from other African countries who may enter the national post-school system to start and/or complete their education, or re-skill themselves for better employability prospects. The plan does not detail how this post-school student population can be best accommodated within the South African post-school system in support of the greater Southern African society and geographical region (LF)
	Developing a more student-centred higher education system: supporting access and success (p.82)	While there is acknowledgement of multiple factors that affect student success, the Plan is silent on how DHET will address some of these e.g. campus safety and sexual violence on campuses. International higher education institutions require mandatory reporting of campus safety strategies and what institutions of higher education are doing towards promotion of safe campuses and prevention of all forms of crime –and its impact on student success (SD)
		The draft plan indicates that “significant enrolment growth”, “albeit at a slower rate” is planned going forward. However, there is a little or no analysis of enrolment trends, post the NPHE, other than in relation to the growth of absolute numbers since 1994. There were a range of outcomes linked to enrolments in the NPHE, for example, increasing the participation rate and shifting the

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		balance of enrolments in relation to fields of study. The participation rate target, which was set as 20% to be achieved over 10-15 year period, is close to being achieved – it was 19% in 2015. Should the target be revised? The current average for upper middle-income countries is 37%, which is probably a long shot, given both financial and human resource constraints. However, should a new target be set somewhere between 20% and 37% and on what basis? Similarly, in relation to shifting the balance of enrolments in fields of study, the target 49% (H); 30% (SET); 30% (BCM), has been achieved. Is the target still relevant or should it be changed given the changed context, for example, the debate of the fourth industrial revolution. Aside from assessing whether the enrolment outcomes and targets set in the NPHE have been met, a detailed analysis of enrolment trends would provide the basis for determining new outcomes and targets linked to the goal of expanding access and taking into account the current constraints. The point is that the “significant enrolment growth, albeit at a slower rate” should be translated into numbers and targets based on the analysis of the relevant factors such as the financial and human resource constraints, including the number of school-leavers with the requisite entry-level qualifications, higher education throughput, drop-out and graduation rates, and so on. Furthermore, although there is reference to the fact that extended programmes have contributed to improving success rates, there is no evidence to support this; nor is it clear why in future extended programmes would cover 30% of first-time entering students – what is the current coverage and why increase it to 30% and not 50% or even 100%. This is probably due to funding constraints; if so this should be indicated, including providing the relevant data. Finally, there is reference to system level targets being set for success rates, etc. but these should be outlined in the draft national plan and not left to a future date, especially as the information to enable this is at hand – (AE).
		CAS is trying to copy UCAS in the UK but not copying it well. CAS should be differentiated, each sub-system should have its own CAS and there should not be one CAS for all PSET institutions (UNISA HE CS)
		Has the plan learned anything from previous research on CAS? (UNISA HE CS)
		Factor in the cost of location in the allocation of funding for student housing. (UNISA HE CS)
		The Plan should address issues of campus safety. (UNISA HE CS)
		In terms of student support interventions only academic support is mentioned but not psychosocial support. (UNISA HE CS)

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		How do you create an integrated and equal system if curriculum for HE is not centralised? (UNISA HE CS)
		The Plan states that the long term goal is to have more students accessing university accommodation particularly first year students. The Plan should consider all students and not only first year students (UNISA HE CS)
		Norms and standards for accommodation should be developed so as to avoid students accessing sub-standard accommodation. (UNISA HE CS)
		How well does the system monitor the quality of the students who graduate and exit into employment? (UNISA HE CS)
		The relationship between financial reward and research output does not promote teaching excellence. Researchers are better assets than teachers at universities. Research rewards more than teaching so relook the value of research and teaching in the Plan. (Durban HE CS)
		The Plan needs to focus some more on responsiveness of universities to African challenges. (Durban HE CS)
		The Plan should make it clear how the appetite for postgraduate studies will be stimulated. In order to transform teaching staff there must be postgraduate students. This is closely tied to infrastructure as students need support to complete their qualifications. (Durban HE CS)
		Emphasis on student retention needs to be lifted out. How will they be retained in the system, how will they be supported and how will they be put through? (Durban HE CS)
		Students are not responsive to the interventions being provided in universities. Student centeredness should also be a responsibility of students. (Durban HE CS)
		The emotional needs of students are not being met and the Plan should address this. (Durban HE CS)
		There should be a policy on institutional environments where there is celebration of statues and building names which do not speak to a student centred culture. (Durban HE CS)

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		A working model is needed for supporting students who are coming from basic education which could focus on career guidance and study options. A period of intense career guidance after matric results come out and computer courses are needed to get students ready (institutional intervention issue rather than Plan issue). (Durban HE CS) Deficit model is used in thinking about students. What is the extent of preparedness of universities? (Work is being done in academic development in this area, not really sure if it is a Plan issue. The Plan is strongly advocating university preparedness in the proposals in this area) (Durban HE CS) Matric certificate is a marker of university entrance. Experience is that students who barely make it more often than not outperform those with very good results. Some poor students have lower aggregates because of their own effort and others do well because of spoon feeding. There is a need to measure students' own efforts rather than those who are nurtured (Interesting point but not an issue for the Plan really – maybe a research project). (Durban HE CS) Online education system is needed to offer flexible provision for students who get employed straight after school and do not get a chance to go to university but qualify for university education. (Durban HE CS) More evening classes can also accommodate working people. (Durban HE CS) With regard to student access and success a major issue is that the number of students who come to university to study the sciences are underprepared for university studies in mathematics. This needs to be addressed to improve student success and throughput at the first year level. Further many students at all levels seem to think that they will pass without putting in the required effort in their studies. There needs to be some regulation with regard to students satisfying attendance and completion of work assigned during the semester, in the context of very large classes. For example funding needs to be provided to install biometric finger-print devices to automatically record attendance at lectures. With access to free HE for students who satisfy certain requirements there needs to be a requirement that the degree needs to be completed within a fixed period; for example minimum time for the degree plus 1 year (UKZN)

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	Promoting African languages	The promotion of African Languages in and through HE, also in terms of the different types of public and private institutions, within learning precincts, may require purposeful planning to promote the use of particular African languages, while also building students' academic literacies in English (SU)
	Notion of student centredness	The development of a more student-centred system is welcome particularly in light of the extent of student rage against student un-friendly, unaffordable, and 'colonial' higher education witnessed almost nation-wide in 2015/16. Yet, the notion of 'student-centeredness' has to be viewed critically, and perhaps a more appropriate notion is that of 'student-friendliness'. Moreover, not only access and success should be supported with a more student-friendly system; rather what is required is a holistic view of the entire student experience, involving a theory of change and a model of the student lifecycle from application to transition into the first year experience, subsequent year experience, through and out of higher education, and into the world of work. HSRC researchers have been involved in a number of relevant related studies. For instance, our recent review of ten years of scholarship on the student experience of higher education in South Africa (2006-2016) indicates the extent to which student life is experienced by South African higher education students – and particularly by black students, female students, poor (and NSFAS-funded) students, and LGBTIQ students - as alienating if not outright traumatising. ²⁴ Our work also indicates that while there is indeed “no single intervention [that] can solve the challenges of improving success for all students” (NPPSET 2017, p. 86), there are known interventions that can solve a great deal of students' challenges and not only interventions that directly improve student success but also those that indirectly do so, by providing a more student-friendly learning experience. ²⁵ Hence, what is required is a holistic view of the full student lifecycle and a theoretically informed grounded theory of institutional change. ²⁶ We are looking forward to engage with the Department on this work as well as our ongoing work at the HSRC into the New South African Student Movement: From #RMF to #FMF. (HSRC)
		In terms of the NPPSET proposal to annually monitor system level performance of student success improvements by means of conducting monitoring and evaluation studies as well as annual cohort studies (NPPSET 2017, p. 87), we also propose that the DHET commissions comparative qualitative (in-depth) studies, including studies of best practice, in order to support systemic learning and develop a knowledge base of ways to improve student success within the South African context along with the DHET commitment to contribute to the strengthening of student support services (HSRC)
		Systems to promote student success and encourage not only student-centred approaches (and e.g.

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		the use of <i>learner</i> analytics), but also learning- and knowledge-centred approaches (and e.g. the use of <i>learning</i> analytics) (SU)
		A statement such as “students are the backbone of the higher education system, and are the primary reason why higher education institutions exist” (<i>cf. NP-PSET page 76</i>) points to a view which is “student-centred” at the cost of broader learning- and knowledge-centred notions (SU)
	From social justice to outcomes driven imperative	Higher education is linked to societal and economical contexts in inseparable and complex ways, which becomes evident in the NPPSET. Despite the references to transformation and student-centeredness in the NPPSET, I have noted (with some concern) the distinct shift in the White Paper on Post-school Education and Training (2013) and in the NPPSET from a focus on social justice and redress (as espoused in the White Paper 3 on the Transformation of Higher Education, 1997) to a more outcomes driven imperative with a focus on skills development for (immediate) employment (with a resultant emphasis on student success and throughput) and knowledge production, application and transfer (with greater involvement of industry and the workplace). Student access, success and employment are, of course, important given the current national higher education student success indicators, youth (un)employment figures, and the slow economic growth evident in South Africa. But the unintended consequences of such a policy shift may be that universities are seen as just other knowledge based institutions focused on the exchange of knowledge and knowledge workers with other organisations (LF)
		Though the strong focus on skills development within the NPPSET is to be expected in a plan focused on substantially growing the vocational education sector, it becomes a concern within particularly (but not only) the higher education sector where the purpose of education reaches way beyond a singular focus on skills development ⁷ . Such a vocationalisation of higher education holds the very real threat of a loss of academic freedom and institutional autonomy where outcomes are determined externally, rather than through excellence within disciplinary genres and when there is no clear demarcation of prospective employers’ involvement in curricular design (as is the case in the NPPSET). As such, skills acquisition becomes an individual quest towards immediate applicability (in becoming employable), rather than developing professional and intellectual knowledge. It also does not address the scholarship of teaching and learning necessary to achieve the envisioned ends of the plan, even though there is a strong emphasis on academic staff capacity building within the plan (LF).
		A more holistic notion of skills development in line with the so-called skills identified by the World Economic Forum (2017) as essential to succeeding in the Fourth Industrial Revolution (including

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		<i>complex problem solving, critical thinking, creativity, people management, coordinating with others, emotional intelligence, judgment and decision making, service orientation, negotiation, and cognitive flexibility</i>) may be called for. Yet the NPPSET does not set out whether these skills are indeed considered important, and if so, how the higher education system (and in particular at the postgraduate level) will be transformed towards this end. The NPPSET does refer to a need for curricula and programmes that will prepare students for a 21st century world, yet the strategies listed towards achieving this goal are not well aligned to the goal itself (planning, monitoring and evaluation of student access and success; teaching and learning, curriculum development and new technologies; student housing and other areas of student life; and financial support for students). A key concern may be whether there will still be future State support for university qualifications and programmes that do not produce graduates for occupations in high demand (based on the need for economic growth, opportunities for employment of high numbers of people, and that support social development priorities (LF)
	Student housing	Student housing challenges and the potential of residential education strategies to further enhance listening-living-and-learning environments, develop strong student governance structures and embed student leadership development opportunities in the co- and formal curriculum may need to be planned in more detail if student housing/accommodation were to be seen as co-curricular development spaces (SU)
	In service training	There must be provision to support students doing in-service training in the Plan (CT HE CS)
	Access and rural universities	Our planning of the system tends to be based on the assumption that in exercising their choices, students will equally consider rural universities as their study destination. However, the reality is that students still prefer metropolitan universities because these tend to be well resourced and offer students real prospects of employment upon completion of studies. The issue of rural de-population is also a key factor in the choice of universities in urban spaces (CT HE CS)
	Postgraduate students - Currently, 16.6% of the total students in public higher education institutions are studying at postgraduate level (2015) (p.94)	So what should it increase to and by when? (VW)
	Funding of postgraduate	<i>Cf. draft NP-PSET page 94, the two bullet points:</i> There seems to be a discrepancy in

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	students (p.94)	the percentages of NRF-funded postgraduate students in the two bullet points: 16% vs. 10% (SU)
	Doctoral studies	The UCDP has much potential to help universities move away from a silo-like approach to capacity development (in terms of particularly teaching and research) towards a more integrated approach to scholarship. However, the rather narrow definition of and strong focus on skills development in the NPPSET is problematic particularly in reference the postgraduate domain universities occupy. The NPPSET does refer to investigating new models of doctoral education (which I assume refers to both doctoral programme formats such as the professional doctorate, and modes of supervision such as cohort supervision). These are useful points of departure for transforming the postgraduate higher education environment, but the NPPSET remains vague on the specifics thereof beyond improving postgraduate student funding, and incentivizing, rewarding and professionalizing supervision (which then becomes key issues in terms of <i>staff development</i>). How this may happen is not specified beyond providing earmarked grants; this draws attention to improving postgraduate throughput and research output without considering some of the underlying issues in the system. Given the difference in what a doctorate might entail based on programme formats, we need to ask ourselves the following pedagogical questions: • Do we have a shared understanding of what a doctorate means across the higher education system in South Africa? • Do we share the same expectations on doctoral outcomes across (and even within!) our higher education institutions? Thus, what kind(s) of scholars are we trying to produce? • Do our students and supervisors share these understandings and expectations? • To what extent are our institutional and national policies sensitive to contextual and disciplinary nuances, but at the same time robust in meeting international expectations and demands? • There still seems to be the prevailing notion that obtaining a postgraduate qualification automatically also enables a person to supervise in pedagogically sound ways, although both international and local literature has proven otherwise. How well does the doctorate prepare early career academics for the multiplicity of academic practice? The forthcoming national review of the doctorate may address some of these issues, and it will be interesting how the outcomes of this review feed into the NPPSET (LF)
	Curriculum	How is the Plan responding to the call for “decolonisation”? (CT HE CS)

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	Quality assurance and support	Strengthening of quality assurance, and academic planning support and capacity-building mechanisms (e.g. online tool kits for designing new academic programmes) with which institutions can be assisted in developing differentiated missions, without adding additional strain on academics (SU)
	Growing the staffing capacity of public higher education institutions	It is not clear what the government is doing with the capacity of HE. There should be a focus on quantity and not quality. (UNISA HE CS)
		Staff retention is poor as better conditions of service and pay in the private sector makes the sub-system lose good staff. (UNISA HE CS)
		The lecturer: student ratio is too high. More academics are needed especially with online teaching expertise. Online learning demands more from lecturers. The lecturer: student ratio should be different for distance and online learning. (UNISA HE CS)
		Remuneration – how can the DHET help with issues of staff remuneration? There are disparities in salaries between academics and admin staff that needs DHET intervention. The DHET can assist universities to structure flexible packages. Differing student loads affect research output and people must be paid based on what they love doing, whether it's teaching or research. (UNISA HE CS)
		There should be consideration to make the principle of equity in relation to the compensation of staff more explicit in the Plan to avoid a situation where the well-resourced universities poach staff from the less resourced institutions (CT HE CS)
		Should we have a framework to regulate staff salaries in universities? This question should be explored further bearing in mind that the DHET has no mandate to control salaries of staff at universities (CT HE CS)
		The nGAP needs to be revisited and reviewed as in the beginning it focused on business and science lecturers. nGAP also needs to focus on humanities as well so as to strengthen capacity in the humanities. (Durban HE CS)
		Pipeline of academics should be based on normal recruitment as well as universities growing their own timber. (Durban HE CS)
		Key questions to ask are: How do we retain academics within the system? How do we make teaching fashionable? Remuneration for academics is not very good so young people leave. (Durban HE CS)

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		The remuneration for nGAP is lower than for lecturers so it is not attractive for young people. (Durban HE CS)
		Most university lecturers are subject specialists and not educationists. Lecturers need to learn about how learning takes place. Pedagogical training is needed and lecturers should also go for training in industry to link the classroom with industry. (Durban HE CS)
		The sector need needs resources to absorb the expansion. We need highly qualified and specialised people teach students who are absorbed by our universities. The current interventions through the TDG/UCDG are not sufficient (CT HE CS)
		A larger emphasis should be placed on the importance of growing the percentage of doctorate staff at universities, with concrete plans to achieve this. This could potentially be done through an expansion of the actual number of academic staff members in the sector – as those who need to complete their doctorates are the very same people who have to teach growing numbers of undergraduate students. Even if their time could be freed up for the completion of their doctorates, the quality of undergraduate training also needs to be retained and in the current system it is often impossible for them to be replaced by alternate lecturers. The number of suitably qualified lecturing staff has remained stagnant for many years while student numbers have grown exponentially. Without significant growth in numbers of doctorate staff at universities, PhD outputs and high-quality publication outputs will not grow (SU)
		Postdoctoral fellowships may be an excellent way in which to attract young PhD graduates to academia by allowing them to establish themselves as researchers before being drawn into high lecturing loads. The current national approach to Postdoctoral fellows (in terms of SARS regulations and restrictions), however, is not conducive to the growth and attractiveness of this critical research training period for young PhD graduates. The NP-PSET is nearly silent on Postdoctoral fellows and how they could be used to grow (strengthen, rejuvenate, transform) academic staffing in the sector (SU).
		Existing barriers to recruiting international academic staff should be removed. Successful research nations welcome (and go out of their way to attract) academics from across the globe (SU)
	Academic freedom	If there is to be a national focus on particular kinds of programmes and particular preferred areas of

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		knowledge production in public higher education institutions, it may corrode the notion of academic freedom that draws the best and brightest into academic careers in the first place. Academic freedom should not be equated with institutional autonomy, nor does it only pertain to the views and work of the individual academic. Academic freedom, rightfully earned, is the preserve of not only scientific communities, but safeguards society against forces of polarisation and extremism. What is the role then of the critical intellectual within a market/State regulated and economy driven/responsive corporate higher education environment? The NPPSET does not engage with these questions adequately, which necessitates that universities create spaces for these debates to take place and develop within the South African context (LF)
	Leadership development	In terms of staff development across the post-school sector, the streamlining of SETA supported initiatives (particularly related to capacity building initiatives) is a welcome policy directive in the NPPSET. It is, however, worrying that the term “leadership” is only used in conjunction with universities, but is absent in the discussions of other post-school environments (such as TVET colleges). Our research has shown that these environments are in dire need of leadership development (LF). Both the Centre for Higher and Adult Education, as well as USB-Ed have been involved in initiatives focused on leadership development within the TVET sector, and may provide a useful platform for collaboration between university and college systems as outlined in the NPPSET22
	Support staff: student ratios	<i>Cf. draft NP-PSET page 94:</i> It may be useful to also include information on support staff : student ratios (SU)
	Research (p.106)	Research should inform teaching and learning but it appears research funds to some of the universities are being cut making it difficult for academics to engage and share their research with their community (UNISA)
	Internationalisation (p.106)	Collaborations and partnerships are very crucial especially on the African continent but of late some unions and academics in some institutions are complaining about the admission of foreign students to postgraduate studies in South Africa. Equally so is the employment of academics who are permanent residents and naturalized South Africans in some institutions (UNISA)
	Research and Innovation	Research and innovation is presumably a critical strategic objective and requires a section in its own right – it cannot be subsumed under the general rubric of higher education in support of society (AE)

Section Title	Issue and Page No	Comments
		The Plan is weak on research and knowledge (USAf TTS)
		The Department should continually review the list of approved journals to indicate which journals are predatory. (UNISA HE CS)
		E-resources should be a priority. There is slow pace of roll out as some research has been done by USAf. Roll out must be fast tracked. (UNISA HE CS)
		The idea of a national license for digital resources is welcomed. However, a centralised library should be taken out of the university and hosted by the Department. (UNISA HE CS)
		When the DHET and/or DST negotiate(s) with the relevant commercial entities about licenses for journal databases, please include national licenses to key bibliometric databases as well (SU)
		The NPPSET recognizes the importance of strengthening research as a distinguishing feature of universities. Yet, the NPPSET does not explicitly address or provide strategies in terms of developing research collaboration. This is particularly a concern in terms of the development of research collaboration of early career academics, who may not yet have established research networks. The NPPSET also does not account for the organic way in which international research collaborations usually develop. If research funding and related collaborative research and development opportunities are solely determined by a State specified agenda, universities may lose out on opportunities to support novel, inter-/trans-disciplinary and/or future oriented research. Is there room in the NPPSET agenda for research that does not easily fit into applied research categories, so-called niche areas of national importance, and current bi-/multi-lateral agreements? (LF)
	Improving governance, regulation and accountability	The Plan does not address management and leadership of HE institutions (UNISA HE CS)
		Until outsourcing stops there will be problems with issues of governance, regulating and accountability. Corruption in governance structures needs to be addressed. (UNISA HE CS)
		On the issue of transformation, what does DHET do with institutions that are reluctant to transform? How does DHET deal with dissonance between its policy and university positions and responses to that policy? (UNISA HE CS)
		Students are not well represented in university committees. (UNISA HE CS)
		There should be a policy that guides what to do with institutional racism and protecting whistle blowers in relation to governance issues. (Durban HE CS)
		Though building a public post-school education system that employs strong ethical governance and accountability mechanisms is laudable, one has to ask what the strong regulation and monitoring

Section Title	Issue and Page No	Comments
		mechanisms will entail? How and by whom will these mechanisms be enforced? And to what extent could these mechanisms infringe upon both institutional autonomy and academic freedom? (LF)
	Section on transformation	The discourse in the HE section on transformation is similar to the previous plan and other policy documents. The plan is that I think the plan should incorporate some key recommendations which emerged from the 4 commissions at the Summit as the areas covered by the commissions in my view constitute key pillars of transformation sorely needed in most of our institutions. This would also entail embedding a wider conception of transformation in the research and teaching and learning sections (JF)
	Developing higher education in support of society and the post-school education and training system	Community responsiveness in qualifications offered is problematic as students want global and not local recognition. Students should be able to respond to any challenge, not just local ones. (Durban HE CS)
		Institutions are detached from communities. How can highly illiterate communities surround universities if universities are being responsive to the needs of communities? Universities are not connected to communities. Representation at council does not even include ordinary people from communities. (Durban HE CS)
		The ivory towers in the development of higher education should be broken down and a collaborative process should be created where people within universities can learn from and develop each other. Collaboration will promote better articulation. (Durban HE CS)
		Universities should forge stronger relations with companies and employers to promote employment and internships. (Durban HE CS)
		Academics can assist with reviewing municipal LEDs. Most municipalities get funding to get consultants to do it. This money can be channelled towards universities although it gets consumed by the university and does not get to the lecturer. (Durban HE CS)
		Institutional governance is much worse at some TVET colleges than at universities. Can universities not mentor TVET colleges? (Durban HE CS)
		There should be a policy on incentivising universities for responding to policy imperatives. There are no incentives for addressing community needs. Everyone is chasing global rankings which have no bearing on community engagement. (Durban HE CS)

Section Title	Issue and Page No	Comments
		Universities should educate young black people to assist with promoting community upliftment. (Durban HE CS)
		With regard to developing higher education in support of society, perhaps the establishment of Rural Development Departments at universities could help. Strengthening ties between HEIs and industry (and the general workplace) is essential and is consistently mentioned in the document as an area that requires development. This will ensure that the graduates have the required skills for a work environment. It will also enable supply planning as the nature and requirements of industries change over time (UKZN)
		It is important to note that on page 102 the NPPSET rightly identifies a lack of conceptual clarity about community engagement across the system; yet there is no attempt in the plan to clarify this conceptual gap at a policy level. Meanwhile, there is a good body of work conducted by HSRC-related researchers considering the changing conceptual diversity ²¹ and policy environment ²² . It should be noted that this policy silence has negative implications for appointment and promotion criteria of academics at higher education institutions (HSRC)
		The section on community engagement doesn't really look at how CE can assist with strengthening universities' contributions to inclusive development through engaged teaching and research and what is needed to create an enabling environment for this to happen at institutional and national levels (JF).
		Even though improving the national participation rates and knowledge production may have distinct economic benefits, it would be unwise to link university outputs (in terms of student throughput and tangible knowledge production outputs) directly to national economic prosperity. Such a view does not acknowledge the important <i>social</i> role the university sector plays (higher education as a public good) and as an important counterweight in critiquing governing forces and attitudes (including both government, industry, and society at large). It disregards the potential role universities can play in stimulating dialogue with and amongst a diversity of role players, and may end up being counterproductive in that it just creates a new mode of inclusion and exclusion and further polarisation. Given the current societal emphasis on social responsivity (an example in the higher education context being debates on the decolonisation of curricula – which is only mentioned in passing in the NPPSET), a more nuanced interpretation in the NPPSET of the role and function of universities as key incubators for societal change and innovation may be necessary. Institutional autonomy is key if universities are to play a role in this regard (LF)

Section Title	Issue and Page No	Comments
		The NPPSET does also not adequately address the university sector's potential to nurture the creative potential of both individuals and groups, which requires time, resources and space for more flexible programme structures, improved student support structures and an investment in developing creative higher education pedagogies, as well as research that may not have an immediate and applied impact. The idea of being a creative university does not exclude being efficient or economically viable, but it takes a longer term view on the benefit it might add to society and the economy, and allows more space for dialogue, experimentation and innovation. A narrow (sober) focus on the economy of the system (both in terms of fiscal and efficiency indicators) may inadvertently infringe on the potential for innovative knowledge transfer, creation and production through both teaching and research, and the eventual contribution the higher education sector can potentially in future make to the South African society and beyond (LF)
	Funding community engagement	There is no acknowledgement in the CE section that funding is needed to cover the costs of engagement and brokering. These things take a lot of time and there are associated costs e.g. transport, field work, workshops, production of popular materials, establishing and maintaining accessible websites etc. (JF)
	Staff development for CE	Also no reference to the need for staff development. Academics do not necessarily know how to broker reciprocal partnerships that are needed to design applied research projects and enhance impact of research. Hence in many parts of the world staff development workshops are being organised to build this capacity. This also costs money (JF)
	Incentives for CE	The section doesn't pick up on the recommendations for providing incentives and support to expand and improve provision - both of which have been key to raising the status of teaching and similarly are needed to elevate the status of CE (JF)
	Improving the CE section	Thanks for picking up on the points about moving beyond fights about terminology. Can I suggest though that you rather use the bulleted points from the attached paper which I presented at the Durban Summit as I think they are better and clearer. I have highlighted a couple of other points from the paper that may be worth considering to possibly expand on the CE section a bit (JF)
	According to the Higher Education Act (1997) the three purposes of higher education institutions are teaching, research, and community	It should really be the purposes of the HE system. Not every institution should do all three (VW)

Section Title	Issue and Page No	Comments
	engagement (p.103)	
	... there is little detail in policy documents about expectations of higher education institutions in this area (p.103)	Nor is there specific funding for this (VW)
		The collaboration proposed between PSET sub-systems will require flexible regulatory frameworks and appropriate enabling legislation (DUT)
	Funding, resourcing and sustainability	Rational student fee regulation should be on the level of fees and based on real cost (SU)
		If efficiency and affordability are key principles of the NPPSET, how will the envisioned threefold growth in expenditure (NPPSET, 2017: 18) be divided between funding students to study, building on current and future infrastructural needs, and developing a competent and growing staff complement to keep up with the needs of the system? How will resource sharing between institutions be strategically managed? Currently it seems as if most of the additional funding for higher education will go to student financial support in order to widen access. However, little provision seems to be made for additional funding for institutional infrastructure and increasing staff complements to cope with larger student numbers (LF)
Support for the rest of the PSET system	Support for the TVET colleges is being provided through a range of Higher Certificate programmes being offered in collaboration between public TVET colleges and public universities (p. 105)	I think this is at odds with the TVET chapter. How does offering HC via colleges constitute support for them? (VW)
Other Comments	Timeframes for strategies	Most of the strategies in the HE chapter do not have timeframes (MM)
		When programmes and or projects are referred to such as the University Capacity Development Programme, it cannot be assumed that the reader is familiar with the programme and its objectives. This should be explained, including its genesis, the fact that it is replacing the erstwhile teaching and research development grants and the reasons for the change (AE)
		Strategies must be linked to prior analyses of the problem, for example, it is proposed to review the

Section Title	Issue and Page No	Comments
		role of the CHE. However, there is no discussion of the role of the CHE and the weaknesses and challenges linked to the discharging of its role, which provides an explanation for why a review is necessary. Similarly, it is proposed that the decrease of the block grant vis-à-vis earmarked grants must be reversed but there is no evidence provided of the decline, its impact on the system and why it should be reversed (AE)
		There is reference to policies that have been developed and which will be implemented as part of the plan such as the Internationalisation Policy. If policy is to be implemented as part of the plan, the main goals and objectives must be outlined and linked to implementation strategies. A similar point can be made in relation to the findings of the Heher Commission, the advice of the CHE of fee-capping and so on (AE)
		It is neither possible nor desirable to include a detailed implementation framework for each of the sub-sectors of the PSET system in one national plan. Consideration should be given to developing an overall framework, which provides the context and includes cross-cutting issues, such as in relation to the NQF and the role of QCs. The overall framework should be translated into an implementation framework for each of the sub-sectors of the PSET system, which would enable a detailed analysis of the policy goals and objectives, associated outcomes and strategies and linked activities and time-frames, along the lines proposed above (AE).
		We are pleased to note that the Plan identifies strategies, and in most cases identifies responsibilities for implementation. Timeframes are largely ignored. We interpret this chapter as providing guidance to universities on many issues with an expectation that they take responsibility for implementation in their circumstances and with some monitoring of progress. We believe this to be appropriate for the university sub-system (SN, ST, CM).
	Student support services	It is welcome that the importance of student support services is well recognised in both chapters 4 and 5 as critical to improving the student experience and student success. However, there is no clarity as to the current baseline of the extent of provision, service levels, etc., and concrete outcomes as to how this will be resourced and exactly what the role of DHET will be in these regards. While some institutions' student affairs departments are comprehensive and well resourced, others are quite poorly resourced, thus reflecting ongoing inequities in the HE sub-system (and in the TVET system!) as well as the apartheid legacy within sub-systems, between institutions and campuses

Section Title	Issue and Page No	Comments
		(HSRC)
	Career development Services	The current NPPSET draft makes an assumption about the nature of career development services already in place at HEIs (page 86), but currently there has not yet been a baseline analysis of the nature, scope and resourcing of such services across the PSET system. This represents a research gap that hampers the identification of targeted interventions to strengthen student support capacity in these areas as well as in others (e.g. disability units, student counselling, student leadership development, student sport and associations) (HSRC)
	Structure	Structure can be improved by combining funding and resourcing with student financial support. (Durban HE CS)
		Understanding that this is a draft document, we would like to point out that the overall technical quality of the report will be enhanced if the following can be paid attention to: • concepts should be clearly defined (e.g. the term TVET system, TVET sub-system); • the use of concepts should be standardised (e.g. workplace-based versus work-based learning); • the list of acronyms is not exhaustive (e.g. the following acronyms are omitted from the list CC, CETMIS, DBE, DPME, DoC, FTE, FETMIS, HEMIS, HETMIS, NLRD, OPSC, PQM, SANREN, SETMIS, SRC, TVETMIS); • paragraphs of text are repeated (e.g. page 74) – the document should be language edited; • the document should be fully referenced, including a reference list at the end, and; • policy documents, especially those with a direct bearing on the NPPSET (such as the Developing Strategic, Annual Performance and Operational Plans for TVET Colleges: Guidelines for 20166, the Annual Monitoring Report on the Projected 2014 Targets of the Ministerial Statement on Student Enrolment Planning, 2014/15 – 2019/207, Strategic Plan 2015/16-2019/208, the University Capacity Development Programme, the Staffing South Africa's Universities Framework, and so forth) should be cross-referenced consistently in text, and could be listed in a table in the appendix with cross-references back to the NPPSET main text (HSRC).
	Comment on entire chapter	Overall, I think that this chapter feels quite vague in terms of a plan. There's a lot of further work required without much specific guidance and it feels like a wishlist. I also don't think there is enough

Section Title	Issue and Page No	Comments
		engagement with the institutional landscape of the PSET system as a whole and the differentiation and pathways between them. (VW)
	Tracer studies	It is noted that the draft NPPSET is silent on graduate outcome studies in the form of national tracer studies and on cohort studies measure more than student academic success. Graduate outcomes involve more than academic student success (even if this is a necessary condition). ²⁸ Most successful HE systems have established national tracer studies with clear indicators which are then used as a proxy of quality and the nature of the labour market, by regions and university type. It is only institutions with strong institutional research capacity that are able to do graduate exit studies and tracer studies; collating the institutional experiences of conducting such studies and their different methodologies, and then assisting those institutions that lack the capacity and resources to develop and implement such studies, would be a way in which the Department could support the system overall (not only the HE subsystem). The HSRC has far-reaching experience in this work, and we are ready to provide the DHET support (HSRC)
	Social responsibility versus economic transformation	The NPPSET is a document that tries to capture the essence of what post-school education and training in South Africa encompasses, navigate the tensions between and within the sectors that constitute the greater post-school education and training system, account for the direction the White Paper on Post-school Education and Training of 2014 dictates, and envision how the system might develop over the next decade. It simultaneously tries to position South Africa as a player in the global knowledge economy, and address local national issues. As such, it engages with the development of a system that is efficient, cost effective and sustainable. In doing so, the plan emphasizes measurable outcomes such as student success, student employability, and research production. This creates a somewhat uneasy tension between the evident need for economic transformation and social responsibility. This notion is eloquently summarized by Manuel Castells (2017:42-43) as follows: <i>The real issue is not so much to shift universities from the public arena to secluded laboratories or to capitalist board meetings, as to create institutions solid enough and dynamic enough to withstand the tensions that will necessarily trigger the simultaneous performance of somewhat contradictory functions. The ability to manage such contradictions, while emphasising the role of universities in the generation of knowledge and the training of labour in the context of the new requirements of the development process, will condition to a large extent the capacity of new countries and regions to</i>

Section Title	Issue and Page No	Comments
		<i>become part of the dynamic system of the new world economy.</i> (LF)
	The entire chapter	Chapter 5 on Higher Education and Work Based Learning should be clarified into more specific and achievable targets. Research into Flexible Learning and Teaching Provision (SAQA, 2015a and 2015b) should be taken into account (SAQA)

Cross-cutting chapters:

Chapter 6: Workplace based learning

Section Title	Issue and Page No	Comments
Introduction	Workplace-based learning (WPBL) is an approach to vocational learning that utilises the workplace for a student to gain access to knowledge, skills, competencies and dispositions necessary for the world of work and specific employment. This is done through real work, paid or unpaid, that leads to the production of real goods and services (p.107)	This is the opposite of an apprenticeship model where the person is an employee who has time off to attend courses. If the understanding is of a student gaining access to workplace learning then this will not be in line with the understanding that informs the Centres of Specialisation project. Given the narrative below of different types of workplace learning this intro needs to be reviewed. This is one type of workplace learning not an appropriate definition (RJ)
WPBL Challenges	Scarcity of placements	The scarcity of placements does raise questions as to whether people are getting training that will find them jobs. I am personally sceptical that low-level training for youth puts them in a position to

Section Title	Issue and Page No	Comments
		become entrepreneurs and small business owners (DB)
Strategies to strengthen WPBL	This section refers to joining up skills levy and core funding. The issue is whether the Plan should say Voted or core funding.	I think the word “core” should not be used. Could one just refer to funding. Within your context the reference to for example growing the core funding – by just saying increasing (perhaps) funding - could be all inclusive – or the distinction could be by referring to increasing the revenue base (excluding State funding)?? (TT)
	Inclusion of other government programmes that pay trainees	Could include some discussion of ECD, where the EPWP and other programmes currently pay the trainees while they are doing the qualification, but then DON'T pay afterwards (DB)
	Rights accorded learners by the LRA (p.109)	Is it the LRA or BCEA that gives apprentices and learners these rights? (DB)
	In addition, the tax allowance that is in place for learnerships and apprenticeships will be extended to include new occupational qualifications (p.111)	Has this been agreed with NT? This is very important. It is a lot of money being brought to this which is very good news (RJ)
	Long-awaited regulations for workplace-based learning must be finalised, so that employers and training-service providers alike know and understand their roles and responsibilities and operate within a clear legal framework (p.111)	Care is needed in relation to regulating workplace learning. The bureaucracy involved is already a major problem. If QA rules are added this could produce a further reduction (RJ)
	Cumbersome processes for registering and reporting on workplace learning which	The MAS evaluation of the dual system apprenticeship run by SSACI goes into some detail on this. What is needed is a much more proactive, hands on approach by SETAs to work with employers, particularly small ones, to put in place effective workplace experience and training. This means

Section Title	Issue and Page No	Comments
	needs to be streamlined (p.112)	shifting resources within SETAs from grants admin to project coordination and industry liaison. You can simplify admin but not the complexity of actual work placement. That needs work that is not currently being done in SETAs. One of the major problems is that small employers may not have the range of work needed for a trade or occupation. So more than one workplace may be needed. This adds to the complexity but is important to address as this is where the opportunities are - not in the bigger companies as in the past. So expanding WPBL fundamentally requires a shift from supporting large employers to supporting smaller ones. SETAs are particularly bad at this and the SCM processes used for grants is not working for small companies. So this is a big issue (RJ)
	The M&E Framework for this Plan will include baseline data and indicators for WPBL to test assumptions about WPBL and its effects on employment outcomes (p.112).	The other criticism we made of the dual system was the lack of monitoring by SETAs of what was happening in the workplace. Serious challenges were not picked up. So monitoring has to be strengthened if this is to succeed (RJ)
	Funding units to support WPBL	The establishment of staff units who can manage placement could preferably be funded by the DHET; WPBL should be well-structured, monitored and learning outcomes should be assessed, and universities should have equally robust practices with which to assess and evaluate WPBL as compared to the assessment and moderation practices for academic learning. Students are often “dumped” on work sites without proper measures in place to ascertain whether learning goals are being achieved (SU)
	Simulated WPBL	Some universities may choose to invest more time and resources into the establishment of simulated work-place learning experiences. In some professions “simulation” may be as costly as WPBL, though. But simulation centres could potentially be centralised and shared between universities within a region. Internationally there are well-established simulation practices that provide safe environments for students to learn without harming others or dealing with the pressure of human contact (SU)
	WPBL as part of programme offerings	Integrating WPBL as part of a programme’s design is not a well-established practice and as such, looking at the applied and practical components of programmes receive more attention. In many programmes there could be a practical component that offers the option of achieving outcomes through a WPBL or service-learning (SL) component. These activities should not be seen as add-ons

Section Title	Issue and Page No	Comments
		but as part of credit-bearing modules. Such an arrangement could reduce the need for additional funding, as it would be funded as part of the programme. (In addition, the capacity for academic planning at many institutions may have to be strengthened, with the necessary training provided to programme committees and teaching staff to develop such curricula.) (SU)
	Promote diversity of workplace-based learning opportunities	Workplaces are diverse and there are instances where small businesses, local government and Non-Profit Organisations can equally serve as workplaces where students experience mentoring that prepares them for the world of work. At universities, these forms of learning spaces have not been fully explored. Using diverse spaces may provide students with opportunities to develop their soft skills such as collaboration, communication and professional behaviour (SU)
	Eliminate barriers to critical partnerships between education and training institutions and workplaces; and Improve the responsiveness of programmes and curricula to the world of work	Fostering partnerships is essential for collaborative learning practices. As such, businesses should have a choice to apply for a status of being a WPBL site and receive tax cuts for doing so. They need to have staff who can reach out to universities to provide opportunities for placements. They should also receive incentives from SETAS when hosting students. The ideal is that there should be reciprocity in the university-industry interaction where lecturers may invest time to bring industry up to speed with new developments and knowledge, something that universities should be incentivised for. Programmes that include simulated learning or WPBL may receive additional subsidy as incentive to produce better-equipped graduates for society. This can only be successful when programmes are appropriately structured and WPBL activities are aligned with learning outcomes. Research in the field of WPBL has developed theory-based pedagogical principles that provide a strong grounding for such a practice. It is unfortunate that this type of learning is only associated with vocational training and less practised in HEIs (SU)
Other comments	General chapter	WPBL - this chapter is rather under-developed when compared with the others. Does it warrant being a standalone chapter? (JK)
		WPBL needs nuancing in relation to what universities do (USAf TTS)
		Should WPBL be separate or integrated in the chapters? Maybe have a summary of cross cutting issues and then address the issues in the chapters as they relate to specific sub-systems (UNISA HE CS)
	Definition of WPBL	While there is some contestation on the definitions proposed by the DHET in its WPBL policy framework (DHET, 2015) it potentially offers a useful structure to frame the identification of particular types of WPBL problems and more targeted suggestions on how to address these. The

Section Title	Issue and Page No	Comments
		framework proposes at the very least a distinction between WPBL programmes that have the purpose of facilitating: 1) achievement of a qualification, 2) acquiring professional registration and, 3) gaining work experience only (DHET 2015) (HSRC)
	Augmentation of problems of WPBL challenges using HSRC research	ESD completed research in this area would support the ambit of problems identified in this chapter, especially the issue of policy incoherence between DoL and DHET acting as an obstacle to WPBL provisioning. But we would argue that a clearer alignment between the identification of problems and interventions could be achieved by structuring these sections according to the definitions available. For example, while identified problems range from funding, the fact that some TVET programmes do not require WPBL, weak linkages between TVET Colleges and industry, the strategies outlined talk to issues of programme design, capacity, information and support, and quality assurance, for example (HSRC)

Chapter 7: resourcing and financing of the PSET system

Section Title	Issue and page No	Comments
Introduction		
PSET System Funding Context	Growth of the system would need new funding frameworks. Is there need to be more specific about how the different funding frameworks operate?	I would think it could be good – funding frameworks could anytime be amended but reference to the existing once used (as basis for the assumptions/discussion) could be good (TT)
	Sustainability and funding of community colleges	There is the need to caution on this issue as the whole process depends to a large extent on funding. Special attention should be paid to the community colleges as it appears no constituency advocates for it (UNISA)
Expanding and	Financial exclusion	The Plan does not address the issue of financial exclusion and how it contributes to high dropout

strengthening the PSET system: Funding Implications		rate. (UNISA HE CS)
	Inequity of funding	There is inequitable funding of social sciences and sciences. Funding models of different disciplines need review. (Dr Green explained that a funding review will be developed which will be shared with the system. There is research being done by USAf to determine the actual costs of HE). (UNISA HE CS)
	Stakeholder engagement on NSFAS	In relation to the growing and never ending challenges with NSFAS, a meeting is required with all stakeholders – NSFAS, DHET and VCs. Issues need to be raised in specific and relevant platforms. (UNISA HE CS)
	Historic debt	On the issue of historic debt and continuing students, gap funding provisions are not being applied. (UNISA HE CS)
	Inequity in NSFAS funding	The Plan is silent on many issues, for example, the distribution of NSFAS funding should be equitable regardless of institution and the Plan needs to make this provision. (UNISA HE CS)
	NSFAS Admin	Plan recommends improving NSFAS administration and this is a flawed recommendation. The Plan should be proposing the decentralisation of NSFAS. Centralisation makes it difficult for NSFAS to address problems in individual institutions. NSFAS quantitative data looks very good but the qualitative dimension is missing. NSFAS does not have student friendly systems. (UNISA HE CS)
	Poor Planning at NSFAS	NSFAS is an emotional issue. There is poor planning at NSFAS. Budget cycles are affecting disbursements. Students do not have books and they are supposed to write tests because they have not been paid their bursaries. (UNISA HE CS)
	Third stream income	Policy on third stream income is needed. Third stream income needs to be controlled as some institutions are beneficiaries of criminal proceeds. There should also be equitable distribution of funding acquired from third stream sources. (Durban HE CS)
	Student fee increase	Is the decision to keep student fee increases on single digit viable based on the fact that most students are poor? If double digit fee increases lead to institutional viability and sustainability then it should be considered as fees are an important source of university funding. (Durban HE CS)

	Implications of fee free education	The implications of fee free announcement on scholarships needs to be clarified. Providers of scholarships and other bursaries need to know if they should stop giving these since there is now new money being channelled into the system (Dr Parker explained that the Department will speak to sister departments to tell them that any other funding currently in existence should continue as more resources are needed. Some of the scholarships come with offers of a job on completion so these are critically important) (Durban HE CS)
	Implications of fee free	Implications of the fee free announcement must be clearly considered in the Plan. Some institutions are experiencing practical problems from a higher demand by students as a result of the lifting of the NSFAS threshold. (Durban HE CS)
	Increase in funding	There is an encouraging general acknowledgement that funding in the education sector needs to grow in line with inflation and the increased costs associated with the proposed expansion. The impact of a lack of funding is highlighted in several sections with the three key points being: the impact of budgets on proper staffing at institutions, the current lack of infrastructure development and lastly the need to better fund students to increase access to learning opportunities. The source of this funding is not explained and it is acknowledged in several places that the current slow economic growth in the country is making this increasingly difficult. There is a disconnect between these two realities (UKZN)
	Funding of supporting institutions	Professional bodies need more support in terms of funding. The current allocation to these entities is grossly insufficient (CT HE CS)
Key strategies for funding and resourcing the system	Infrastructure use can be optimised if there is data on the available infrastructure. In this regard a national data system with GIS capabilities should be invested in (p.118)	Why GIS specifically? May require some explanation (VW)
Data systems	FETMIS+SETAMIS+HETMIS to ensure tracking of student funding through the various funding sources.	Maybe even connect to NLRD and DBE systems? SAMS? (VW)

Other comments	Public private partnerships	We suggest that the funding and administration of quality and costly developments in skills production include investigating the options of developing Public Private Partnerships to deliver: ○ Infrastructure development ○ Increase in throughput ○ Administration and monitoring of ‘wrap around’ services across the three places of learning namely Academic, practical application of theory and work experience. ○ Platforms to engage with the private sector (SN, ST, CM)
	Concerns about funding of the system	Do we have to worry about the costing of the plan when there is a huge amount (about 57 billion) of money allocated to education by National Treasury (CT HE CS)

Chapter 8: Planning, monitoring and evaluation

Section Title	Issue and page No	Comments
Introduction		
Planning		
Monitoring and evaluation	Evaluation timeline	The evaluation timeline is a useful roadmap and it would be useful to superimpose the different aspects of planning in the system to the roadmap so that the multiple layers of the system are shown which can enable accountability (USAf TTS)
	Macro targets	If this Plan is to be called a PSET Plan, macro targets, concrete outcomes, related indicators, milestones and benchmarks should be included (HSRC).
		The NPPSET needs to be readily translatable into concrete, short and medium-term objectives that provide an implementation, monitoring and evaluation framework in pursuit of White Paper goals. If the aim is a concrete implementation framework, it should be expressed in terms that allow for quarterly, half-yearly, and annual periods of reporting with mechanisms for monitoring control and feedback. This document thus requires details on how and by when the goals set out in the White Paper are planned to be implemented (HSRC)
		If the purpose of the NPPSET is to be a high-level overall implementation framework, then at the very least the documents in which the detailed implementation activities (including outcomes, indicators, milestones and benchmarks) are set out, should be referenced prominently. The flow of policy documents is important; if this is not present, the plan runs the risk of merely being conceptual without the requisite operationalisation. This can likely render the plan un-implementable because it

		does not provide structure and evidence of planning activities from the macro to the micro levels. Thus, documents such as the Developing Strategic, Annual Performance and Operational Plans for TVET Colleges: Guidelines for 2016/2, the Annual Monitoring Report on the Projected 2014 Targets of the Ministerial Statement on Student Enrolment Planning, 2014/15 – 2019/203, Strategic Plan 2015/16-2019/204, all state relevant, specific, measurable outcomes. These documents provide strategies, activities and responsible institution(s) or person(s) to achieve the outcomes, which are explicitly stated to aid in monitoring, evaluation and accountability checks (HSRC).
		Taking the NDP as high level targets and the White Paper as system-specific goals, the NPPSET should indicate how the achievement of key goals will be <i>prioritised</i> in the implementation phase, given that resource constraints can be anticipated and hard choices will need to be made (HSRC)
Data improvements	Data	An enduring theme in the Plan is that there is a general lack of information regarding the current state and efficacy of post-school learning opportunities. There is continual reference to collecting data and using this to shape the future of the various learning centres. If this is handled systematically, it will generate a significant volume of meaningful data which could be used to effectively shape the entire structure of the proposed post-school system. This information should include all of the expected data such as throughput rates obtainable from the Colleges and Universities directly, but also feedback from employers to determine whether various programmes are meeting the needs of the future employers and how they could be improved (UKZN)
		Clear goals and structures for the improvement of data quality across the system should be set out in the NPPSET. Towards this overarching objective a few aspects could be considered: More emphasis should be given on the operational relationship between DHET and Statistics South Africa ³⁶ towards inclusion as a member of the National Statistics System, and by 2025 (2030) all DHET datasets should comply with the South African Quality Assessment Framework (SASQAF) standards (HSRC)
Other comments	System M&E Framework	The M&E Framework for PSET is a key initiative underway. We have spoken about this a few times and I realise the two processes are linked, yet need to develop in their own right. If at all possible, it will be good to reflect on the M&E Framework more explicitly, also in Ch 8 (JK)
	Alignment	the links between the IPPSET, the PSET M&E Framework, the MTEF and APPs is really important to demonstrate and align. We have an array of planning and reporting instruments and the last thing we need is another layer or even layers. This applies specifically to DHET, but of course also to all the other bodies functioning in PSET (JK).
	M&E Framework	The NPPSET should be quite specific about what is meant by an M&E framework and what its components are, i.e.:

		• Concepts • A process map • Theory of change • Logic model (logframe) • Programme level M&E process • Systems level M&E process • Data architecture • Model of actors, functions, and relationships The plan should provide more detail on the integration of M&E in the implementation. For example, the roles and responsibilities of the major role players in the implementation of the MEF need to be explained. Key questions should be answered, such as, who will be responsible for system-wide M&E and programme-level M&E, respectively? M&E is a specialised field and more detail should be provided on the skills requirements at different levels of the PSET system as well as timeframes and deadlines for training. In addition, the NPPSET should indicate the type of research envisaged to supplement monitoring data and inform the ongoing evaluation of the implementation of key interventions (policies, activities), including identifying and describing explicitly the evaluation studies that will be conducted and their timing (HSRC)
	M&E and Data	The inclusion of <u>Monitoring and Evaluation</u> and <u>Data</u> sections is commended. These two sections are well placed as the closing sections of the NPPSET (as they are currently). It is suggested that each of these sections, as for all the sub-sections throughout the NPPSET, could commence with Strategic Goals as outlined in the WPPSET (clear essential bulleted points only), and then contain a clear table with targets, timelines, resources, and entities responsible (SAQA)

More General comments

1. The preparation of the NPPSET will never end as political decisions will continue to impact on it. I would strongly argue for a slightly higher-level document that can provide guidance but that is not continually tripped up by the politics (JK).
2. An executive summary can really help. Of course a good infographic is always useful
3. A final chapter is needed to pull this together (JK)

4. What about the DBE's three streams process? I did not find a clear reflection on this process and how it could impact on PSET? (JK)
5. The document has the writing style of a position paper or strategy document, and not a plan per se.. If I read it from an Institutional perspective, I will need to pinpoint goals and objectives that I can translate into my institutions strategic plan and develop institutional targets to contribute to the National targets. I remember that we have mentioned we will include such a process into the NPSET (EvS)
6. The NPPSET does not present as a Plan because it does not have achievable targets, realistic and feasible dates for each of the argets, resources allocated for each of the targets, and responsibility for implementation (SAQA)
7. The NPPSET places responsibility for delivery firmly in the hands of DHET without taking into account the roles and legislative mandates of the other bodies such as SAQA (SAQA)
8. The Draft NPPSET does not align with the WPPSET. The intended link between the two documents was lost when the NPPSET broadened its scope. The NPPSET should simply be a Plan that explains how the vision and strategies described in the WPPSET will be implemented, the role of each of the NQF bodies responsible for implementation, with their roles and responsibilities clearly defined, expected deliverables with realistic timelines and the resources that will be allocated to each implementing body to fulfil its obligations (SAQA)
9. Ideally, the NPPSET needs to have the same sections and sub-sections as the WPPSET (with similar headings, so that implementers can map what they are doing against the WPPSET). Instead, the NPPSET has broadened its scope to provide another implementation framework under the guise of a National Plan (SAQA)
10. The NPPSET should engage more mindfully with the existing systems and research findings, in order to move the system forward. In its current form, the NPPSET is written loosely, and is factually incorrect in some instances, which suggest that the system as it is, is not fully understood (SAQA)
11. The resourcing aspects should be better integrated into each sub-section of the Plan. The opening paragraphs of the NPPSET could bullet the resourcing principles (SAQA)
12. Document is easy to read, with clear proposed strategies on the implementation of the goals of the White Paper, though the time frames seem to be a bit ambitious in most instances (SD)
13. One of the positives of the NPPSET is the recognition and inclusion of the Colleges of Agriculture, Police and Nursing into Higher Education System. This will hopefully bring closure to confusion of which department is responsible/ accountable for these colleges e.g. between DHET and DOH for nursing education and training in Colleges of Nursing. Increasing the Community Colleges should be prioritised as a solution to the high unemployment rate in this country
14. The current definition / scope of Post- School Education to be confusing in that it also includes those who left school before completing grade 12 or never started school. When taken literally, one would argue that it cannot be post school education for someone who never went to school in the first instance (SD)
15. The lack of clarity on the Plan regarding DHET's capacity to implement all these ambitious strategies within the given time (SD).
16. In a country with so much unemployment and poverty, the Plan should be seen to be promoting entrepreneurship programmes in addition to technology (SD).
17. It also lacks emphasis on training for critical citizenship (SD).

18. The three under-pinning issues, which provide the context within which the draft national plan is located, namely, moderate growth, investing in capacity development and an increase in core funding, is welcome and signals the need to ensure that realistic goals and targets are set. However, the draft national plan falls short in giving effect to this as it does not set specific goals and targets for the different policy and strategic objectives outlined. The draft national plan does not provide an implementation framework for the policy goals of the White Paper on PSET as suggested. Instead it revisits and provides a slightly more detailed discussion of the policy issues outlined in the White Paper. An implementation framework requires the following steps:
- i. Analysing the trends and challenges associated with specific policy goals and objectives.
 - ii. Identifying priorities linked to the specified policy goals and objectives.
 - iii. Outlining the desired outcomes flowing from the specified policy goals and objectives.
 - iv. Indicating the strategies to achieve the desired outcomes.
 - v. Detailing the key enabling activities to give effect to the strategies and the time-frames for undertaking and completing the activities (AE)
19. A detailed context chapter is needed for the Plan, including the constraints in which the Plan is being written (USAf TTS)
20. Contextual issues need to be foregrounded in the Plan. Transition from the previous Plan has to be shown. Right now the Plan is just tautology (UNISA HE CS).
21. Effective implementation will require a deep understanding of the current landscape. We recommend that this be included in the Plan and that, in particular, an understanding be developed of the reasons why some graduates are unable to secure employment.
- We believe that an understanding of the current landscape should include insight into -
 - Qualifications of unemployed
 - The institutions where unemployed studied
 - The nature of their qualifications
 - Employer perspectives of these qualifications
 - The role of professional bodies and their designations which are registered on the NQF are ignored. We understand that the DHET is addressing the role of professional bodies in a separate exercise and has prepared a draft document on the role of professional bodies (SN, ST, CM)
22. Sub-system Plans should be separated and not put together in one document (USAf TTS)
23. How the Plan is named should be consisted, sometimes it is called a framework and sometimes a Plan (USAf TTS)
24. Scenario modelling is needed so that the Plan is based on an ideal and costed model (USAf TTS)
25. Mapping is needed on how the Plan articulates with other national development priorities (USAf TTS)
26. Consideration of whether some TVET campuses can be campuses of universities should be made (USAf TTS)
27. The Plan needs a new vision to frame it (USAf TTS)
28. The Plan should address optimisation of efficiencies (USAf TTS)
29. The Department seems to be doing everything and making central decisions. The Plan is aspirational but it is not clear how things are going to be done. The Plan needs to prioritise (USAf TTS)

30. The social justice project is ingrained in the Plan and it needs bolstering (USAf TTS)
31. Proposals made in the Plan need to be motivated e.g. review the CHE for what? (USAf TTS)
32. The Plan is the same as the White Paper for PSET, it has no introspection (UNISA HE CS)
33. It is too late to be doing a Plan now, a lot of time has been wasted. If a Plan is coming out now what has been happening in the past five years since the publication of the Plan? (UNISA HE CS)
- Is the Plan addressing future issues or looking to the current only? (UNISA HE CS)
- Is the Plan affordable? (UNISA HE CS)
- The voices of employers and professional bodies are missing in the Plan (UNISA HE CS)
- SRCs need a platform to raise issues about the Plan so that the student experience is improved. The environment where other stakeholder groupings are also participating is not conducive (UNISA HE CS)
- The Plan looks like a political document. There are no implementation strategies. The Plan should be directive (UNISA HE CS)
- The Plan should address the needs of students with disabilities (UNISA HE CS)
- The Plan should address exit level outcomes. It is not clear what the plan is for students after they complete their programmes (UNISA HE CS)
- The Plan does not address whether institutions are going to be creating employees or employers (UNISA HE CS)
- The Plan should be called a draft framework for planning (UNISA HE CS)
- The Plan should have a long term and short term focus. (UNISA HE CS)
34. We suggest that the document could benefit with more structure, suggest that:
 - Each section should follow a similar structure:
 - a. Introduction
 - b. Background and challenges
 - c. Reference current initiatives/tests underway
 - d. 10 year strategic objectives
 - e. 10 year plan for each strategic objective
 - f. Plus there should be a consolidated executive summary of the 10 year plans (SN, ST, CM)
35. It is not clear what PSET is and why it is being called PSET, PSET Plan is not as marketable as HE Plan. (UNISA HE CS)
36. The Plan cannot cover everything and deliver on it effectively so there should be a preface which stipulates what the Plan covers so that this is understood up front. (UNISA HE CS)
37. Indicators are needed to see what progress has been made and what needs to be retained and improved. Will indicators be available in the second round of consultation? (UNISA HE CS)
38. Naming conventions in the Plan should be consistent. Sometimes it's HEI and other times universities (UNISA HE CS)
39. Explain terms to make them clearer (UNISA HE CS)
40. Reference to HE Plan is confusing (Note: It should be HE Chapter) (UNISA HE CS)

41. Make it clear why it is called a PSET plan. Also explain the structure of the plan. Clarity is also needed that chapters are for each sub-system (UNISA HE CS)
42. Explain why TVET is not higher education and referred to as part of the college system (UNISA HE CS)
43. Where do the roles of universities and TVET colleges start and end? What are the implications for articulation? Vertical and horizontal integration is needed (UNISA HE CS)
44. There is a gap on the connection between education and training and critical citizenship. There is dominance on training students for the world of work. The Plan needs to tackle skills for citizenship (Durban HE CS)
45. The attrition of students in the schooling system is creating a growing pool of NEETs. How will this pool be dealt with? Is the Plan addressing this? (Durban HE CS)
46. Students for the system come from basic education. Is there collaboration with DBE to work on quality of students who access higher education? (Durban HE CS)
47. A good summary of the Plan upfront will encourage people to read it. (Durban HE CS)
48. Have linkages with other countries been made in the Plan? (Durban HE CS)
49. Some of the policies outlined in the White Paper and Basic Education are not aligned with policies in the Plan. This will make implementation very difficult (SN, ST, CM)
50. The Plan outlines the characteristics of each sub system of Post-School Education and Training and identifies obstacles and opportunities. However, we are not persuaded that it provides a sufficiently detailed roadmap to achieve the plan objectives successfully. Its value lies mainly in the high-level guidance it provides for implementing the White Paper and in giving education institutions an understanding of the kind of system of provision that is envisaged for post-school education and training (SN, ST, CM).
51. No attention is given in the Plan to education programmes or teaching and learning. While we understand that this is not the focus of the Plan we believe that the success of implementation of the White Paper will lie in the detail and, therefore, that education programmes and teaching and learning should be considered for appropriate inclusion in the plan (SN, ST, CM).
52. It appears that most of the responsibility for implementation will lie with the DHET. This will be a massive challenge and, as is pointed out in the Plan, will require significant additional resources. We suggest that the burden of implementation should be shared with institutions in each of the sub-systems and that professional bodies should contribute to the process where appropriate (SN, ST, CM).
53. The roles of the DBE and the DHET should be clarified and clearly articulated in order to ensure that implementation is effective (SN, ST, CM).
54. We recommend that The DHET document related to professional bodies be included in the Plan.
The Plan states that the Community Colleges and the TVETs will offer 'fundamental' learning programmes but provides no detail on the programmes (SN, ST, CM).
55. We welcome and support
 - an integrated post-school system
 - simplification of the qualifications framework
 - improving the interface with the labour market

- developing the infrastructure and capacity of education and training institutions (provider institutions)
 - that provider institutions that operate within the post-school system are not new institutions (apart from the community colleges), and there are no changes to the primary mandate of institutions
 - the change from the current focus on scarce and critical skills to a focus on qualifications and programmes for occupations in high demand (SN, ST, CM).
56. We agree that the growth targets for the PSET system are not attainable by 2030 without significant new investment. Availability of funding is dependent largely on the performance of the economy. Prospects for improved economic performance have been considerably enhanced by recent changes to the political climate and to political leadership (SN, ST, CM)
57. We welcome the introduction any form of education institution (community colleges) that provides education opportunities for South Africans who are currently not catered for (SN, ST, CM)
58. We are pleased to note that the Plan lists strategies, responsibilities and timeframes (SN, ST, CM).
59. While the spirit of the Plan in its aspiration to bring the different post-school institutional formations into a "single, coherent, differentiated and highly articulated" system is applauded, there is little, beyond the diagnosis and policy rhetoric, to suggest that anything substantive will be achieved in the absence of necessary detail to propel the vision. It is hoped therefore, that the detail will accompany the next steps in the policy process (UKZN)
60. It must be acknowledged at the outset that the entire post-school system does in large measure rest on the general schooling system, and that ultimately the post-school system cannot be built on weak foundations (UKZN)
61. In general, the proposal to increase growth in TVETs and Community Colleges is appropriate as it drives more accessible skills development which is required to fuel the so called 4th Industrial Revolution. The allegation that qualifications currently on offer are not responsive to the needs of the work place should be thoroughly investigated through national research studies into graduate attributes and employability. This enquiry should include students' attitudes to studying at TVET institutions and whether it is considered an alternative route to university entry, rather than a desirable end goal (UKZN)
62. Is the Plan feasible; are there any barriers to achieving the goals of the Plan, particularly at an operational level? (UKZN)
63. There is an assumption in the Plan that TVET system is working, which it is not (DB)
64. Terminology that needs explaining: schools of skill; responsive programmes; heavy external assessment system; data systems for funding for students; people centred; people focused (DB)
65. In both ECD and child and youth care work there has been a move to put the qualification that was at level 4 at level 5. What does this mean for which institutions can deliver it? (In addition to the question of who this excludes People inside the professions do not seem to be asking the latter question.) (DB)
66. There is concern that the DHET seems to be superimposing a complex plan in a very weak system (CT HE CS)
67. Issues of equity should continue to be paramount in the Plan to ensure that the growth of the sector does not entrench current/ existing inequities in the system (CT HE CS)

68. The DHET is to be commended for coming up with this Plan (ambitious as it is). The framework reads more as some form of “contextual guideline” than an actual Plan (CT HE CS)
69. One of the areas that we have not been thinking about sufficiently relates to the “pitfalls of the capitalist economy”. We need to welcome the shift in the new Plan that the emphasis is no longer (exclusively) on addressing scarce skills or producing graduates for the market, but rather, on producing “livelihoods” (CT HE CS)
70. Clarity is needed on enforcement mechanism on the implementation of the Plan (CT HE CS)
71. Given the scope and complexity of the proposed Plan, It would be useful for the final version of the Plan to include a comprehensive bibliography containing titles of relevant policy documents
72. The NPPSET is strongly aligned with overarching goals of the *White Paper for Post-School Education and Training (PSET)*, as well as with the draft *National Skills Development Plan* and the draft *Internationalization Policy* (SU)
73. There is support for expansion of PSET opportunities particularly expansion of TVET colleges and introduction of community colleges (SU)
74. The university strongly supports sharing of spaces through precincts, the alignment of qualification nomenclature on the NQF, skills planning for responsive provision, and role clarification, mandate focusing of SETAs, the NSA, NAMB and the QCTO (SU)
75. The differentiation framework is supported as it promotes transformation and sustainability (SU)
76. A realistic, more moderate and adequately funded growth plan for HE is supported (SU)
77. There is support for building the capacity of the system (SU)
78. Formal collaboration between DST and DHET is supported (SU)
79. A focus on support for postgraduate studies is supported (SU)
80. It is commendable that the Plan proposes measures to ensure minimum bandwidth access across the PSET system, access to elearning resources and adoption of minimum standards for student accommodation (SU)
81. The university also supports the quality assurance of the DHET accredited publications list (SU).
82. There should be a clear focus on marketing the role of each player in the PSET framework (i.e. schools, CE&T, TVET, HEI, etc.), the qualifications they offer and where they fit into delivering the skills needed, i.e. to understand the supply offered. (Currently there is a strong perception that HEI qualifications are the main way to contribute to the economy.) (SU)
83. The focus on diversification of the post-school system is welcomed and supported by authors such as Cloete (2015). Such a diversification may facilitate greater clarity on *institutional missions*, addressing the *quality of teaching and learning*, prerogatives for *staff development*, and *fund allocation* (LF)
84. There was nothing in the NPPSET that specifically talked about disability or how it would be addressed (SAQA)