

Qualitative analysis of the Draft Policy on Community Colleges

1. Is the policy internally coherent, and is it aligned with other relevant pieces of legislation?

This question engages with the conceptual logic on which the policy is founded (and which inter alia incorporates the needs identification process, the analysis of what existing policy gaps had to be filled and the noting of sub-policies that might need to be addressed elsewhere or later).

The two purposes

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

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

However, there is no substantive explanation of **how** the policy will achieve these purposes or indeed how these two purpose will meet the actual educational needs of adults and youth (as outlined in Section 1) that the policy is meant to address.

The logic of the function shift

In relation to the transfer, the so-called function shift, of the PALCs to national control, the policy document signally fails to address the issue of how these existing PALCs are going to be **managed** in the next few years except through the mechanism of a single “interim community college”, a TVET college like structure for each province into which all PALCs in the province are to be nominally merged (Section 7). Giving the name “community college” to such a body is **misleading** and such a structure is singularly **inappropriate** for this task, which is essentially an administrative and support one previously handled by the provincial departments of education and their Adult Education directorates or units. Indeed having to set up

a new structure as if it was a TVET college could well disable the current administrative tasks needed to run the (already semi-dysfunctional) PALC system. No indication is given in the policy about **how** this transfer via the apparatus of the legal fiction of an interim community college will actually improve access, teaching and learning in the affected PALCs.

Further, the unintended consequences of simply renaming the existing PALCs in a province as being administratively part of a mega interim “community college” [of a particular province] may simply give the concept of an entirely new institutional form, the community college, a bad name, for it will inevitably be a fiction and be criticised as that. Such an interim “community college” would bear no resemblance whatsoever to the community colleges that the bold and imaginative *White paper on post-school education and training* anticipated.

Given the nature of the root problems, and particularly those related to the present dysfunctionalities of the existing PALC provision (noted in the *White paper* and also in the Theory of Change process), the policy does not seem to take this into real account (especially in relation to resource scarcities and management inadequacies). In addition, it does not address the issue of the (old) Senior Certificate (as distinct from the new National Senior Certificate) that has been recently reconstituted and which would be a major burden that these so-called community colleges would have to carry.

The logic of the creation of a new institutional form

The policy does include an adequate diagnostic analysis, outlines the needs and problems the policy addresses, as well as stating their massive nature and scale and their causes. In this sense a strong, if general, rationale is given in Section 1 for the policy to create a new institutional form as a government priority.

However, though the policy notes that the *White paper* insists that a “new type of institution has to be built and supported; one that can offer a diverse range of possibilities to people for whom vocational and technical colleges and universities are not possible”, it is not apparent in the rest of the policy document that a “new type” of institution is in fact provided for or that real accommodation is made for a “a diverse range of possibilities”. Though the policy outlines a set of principles (Section 2) on which the policy is founded, these principles are **not** evident in the specifics of the policy about creating community colleges.

The draft policy provides little of substance on what a new institutional form would be like. It simply replicates an existing TVET College model without substantive imaginative thought on the nature of a community college with associated community learning centres. Lack of clarity and clear differentiation could

undermine the focus of future community colleges. It would require a very different logic, and require visionary and effective leadership with sufficient flexibility to innovate in the context of competing imperatives within which community colleges would have to operate.

The policy shows signs of a shift from the *Task team report on Community Education and Training Centres* and the *White paper* towards a narrow and mechanical approach to provision. Indeed, in many respects it is an inversion of the originating proposals in which, instead of community colleges being resource hubs to support a network of community learning centres they are now presented as central bodies modelled on TVET colleges which may have a few campuses or centres. Structurally they are hardly differentiated from TVET colleges (except insofar as they may be more directly controlled by the DHET and the Minister – the rationale for which seems counterintuitive to the emphasis in the principles in Section 2 on responsiveness to local community needs).

The mechanical application of the TVET College legislation does not seem to have taken into account the creative moves in a province such as Gauteng to restructure the way that PALCs are administered, clustered and supported.

In summary - the policy lacks coherence with its ostensible purposes

Both purposes, the function shift of the old Public Adult Learning Centres (PALCs) to the DHET, and the setting up of some initial community colleges based on the TVET model, are problematic in that though the policy states that frameworks will be developed, the policy does not really specify such frameworks in sufficient detail, nor does it show the link between the purposes of community colleges (as elaborated in the *White paper on post-school education and training*) and the legal and governance framework for establishing them.

The policy document is weak in its analysis of what sub-policies are envisaged, e.g. the total absence of any discussion on risk management.

Alignment with legislation and policy in the education and skills development sectors

The policy document refers to some legislation (in Section 3.1) (that would generally impact on the community colleges) but its alignment with existing policies and strategies that support youth and adult education is extraordinarily weak. It clearly relates (but largely in terms of bureaucratic compliance) with the move of TVET and the PALCs to a national competence. But crucially, there are no links to the following:

- The constitutional rights to education for adults (Constitution 1996)
- Lifelong learning policies (as in the *White Paper on Education and Training* of 1995, though noted in the *White paper on post-school education and training*)
- Kha Ri Gude national literacy campaign (though mentioned in *White Paper*)
- Open learning (in the *White Paper*)
- *Draft Social Inclusion Framework* (which, by comparison, is replete with specific proposals relating to community colleges)
- *Draft National Youth Policy 2014-2019* (ditto)
- *National Development Plan*.

No mention is made of the status of existing adult education policies and there is little evidence of the links that the proposed policy is meant to provide between formal and non-formal education, the need for which was highlighted in the *White paper on post-school education and training*.

The policy document is, of course, aligned to the *Further Education and Training Amendment Act*, 2013 (Act No.1 of 2013), but that is largely because that Act pre-empted this policy, which is in effect a **retrospective justification** for the sections of the Act which refer to community colleges and the remoulding of PALCs as “community colleges”.

The to be established community colleges (into which the PALCs will be merged) will governed by councils referred to in paragraph 6(1) of section 10 of the *Further Education and Training Amendment Act* of 2006.

There are other policy drafts from other state departments which do propose links with this policy but which the policy itself seems ignorant of.

The *Draft National Youth Policy 2014-2019* (Gazetted 12 January 2015) has put considerable effort into looking at links to adult and community education. Their policy document looks at how to “produce empowered young people who are able to realise their full potential and understand their roles and responsibilities in making a meaningful contribution to the development of a non-racial, equal, democratic and prosperous South Africa” (Section 3.4 page 8). This is absolutely congruent with the principles of the community college policy. The *Draft Youth policy* has key proposals dealing with Education, Skills and Second Chances and stresses (Section 6.2 pages 37-39) the importance of:

- skills development and training for youth
- the role of community colleges in playing a proactive roles in linking with the various expanded public and community work programmes
- the importance of articulation across all sub sectors of post schooling
- the need to fast track the functioning of Community Education and Training Centres through government’s and the private sector’s flexible initiatives of out-of-school pathways for young people who left school prematurely.
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The *Draft Policy on Qualifications in Higher Education for Adult Education and Training Educators and Community Education and Training College Lecturers* (DHET, February 2014) states that community education is a priority as “The State has prioritised the expansion, strengthening and development of a community education and training sector as an important sub-component of post-school education and training and that “well -qualified adult and community education and training educators and lecturers form the cornerstone of good provision” (page 3). Without a stable qualified cohort of permanent professional adult and community education and training educators and lecturers, long-term planning in the subsector will be severely affected and leaves little room for career and learning path development (page 4). By comparison with the community education draft policy (and the comments of interviewed DHET officials), it enumerates a wider range of provision and programme offerings that the state assumes responsibility to provide, including (ages 3-4):

- community health
- parenting and childcare
- care for the aged
- care for those with HIV/AIDS and other diseases
- citizenship education
- community organization
- effective use of new consumer technologies
- seeking information on or marketing of local products
- skills for self-employment: gardening, maintenance, small-scale manufacturing, arts and crafts
- adult basic education and training: numeracy, literacy, communication skills
- National Senior Certificate for Adults, National Independent Certificate
- National Certificate: Vocational Education programmes.

The policy is not particularly prominent in the strategic plans of the DHET. There is some reference to the function shift of PALCs to the DHET, and, in relation to the current minister’s performance agreement, only in respect of continuing the expansion of the number of learners in a broad range of academic and vocational adult education and training programmes. There is no evidence in the policy that a sectoral institutional review been undertaken in relation to programmes targeting youth and adults.

In terms of direct policy comparisons with existing youth and adult education policy, there is three acts to consider: the ABET (2000) and FET Colleges (2006) and the FET Colleges Amendment (2012).

The ABET Act of 2000 was a largely bureaucratic instrument on the governing and funding of PALCs (that was never fully operationalised and was a failure). The current policy is similar in that bureaucratic concerns (related to the function shift) are more central than developmental ones.

The policy simply takes over sections of the FET Colleges Act (2006) and FET Colleges Amendment Act (2012) in relation to councils and principals. It differs from

the Acts in following respects:

- Section 9 of the policy specifies that Community colleges can govern more than one community college.
- The setting up of academic boards becomes optional (though it is not clear why this is so and it is hard to see how the function of a genuine academic board could be performed by officials in DHET head office.

However, the more important problem is that the mechanical adoption of the TVET college governance arrangements does not take into account the policy's principles (in Section 2.1 d,e, f. and g.). The TVET colleges are centralised institutions (though with multiple campuses) and currently exhibit considerable evidence of governance and communication difficulties. This TVET model may be inappropriate in community colleges and the associated community learning centres (about which the policy is almost totally silent (except in respect of the appointment of heads by the Minister (which in itself seems cumbersome if College Councils are to have any effective powers) and the Minister having to publish the details of the name, seat and all the Community Learning Centres in the Government Gazette (a clause which clearly envisages the these centres as being like the various TVET college campuses rather than multiple, flexible and changing sites of education and training as was envisioned in the *White paper* and *Task Team report*).

Another issue is the lack of any reference to cross-cutting constitutional and educational issues such as, gender, human rights, and inclusivity.

Alignment with and consultation with other stakeholders

There is little evidence in the policy of prior consultation with other stakeholders or of incentives to further consultation and collaboration.

Whilst the policy's decision to only deal with **public** community colleges (unlike the *White Paper*) to some extent explains the lack of attention to other stakeholders, the virtual silence is problematic, particularly as the policy talks of "13.5 Programme offerings offered based in collaboration with local authorities, SETAs, community organisations and other Government Departments, as well as industry". Given that many community college like tertiary education institutions offer the same programmes (and which may be accredited by Umalusi or the QCTO) their status becomes confused.

Given the policy intent that community colleges , as quoted from the *White paper* "are expected to be sensitive to the needs of their communities" (1.10) there is little to indicate that decision making over such things as staff appointments and programmes might include consultation with stakeholders and local communities.

2. Is the policy's theory of change (logic) appropriate, and is it sufficiently robust to address the problems of youth and adults that have been identified in the policy?

The draft policy document was produced without any clear evidence of an underlying theory of change (ToC). The Adult Education and Training Directorate in the DHET did have an early draft of a logical framework. A Theory of Change process was undertaken (as part of this policy design evaluation during the later part of 2014). This therefore took place only after legislation had been enacted and the policy document drafted.

There is a clear dissonance between the legislation and the draft policy and the principles espoused in the policy ((Section 2.1) and in the retrospective ToC process.

- 2.1 The establishment and operations of Community Colleges must be founded on a set of principles, which, when construed as a collective, should define what community colleges are about. Accordingly, the following principles must underpin the establishment and declaration of Community Colleges:
- a) Expansion of access to education and training to all youth and adults, especially those who have limited other opportunities for structured learning;
 - b) Provision of good quality formal and non-formal education and training programmes;
 - c) Provision of vocational training that prepares people for participation in both the formal and informal economy;
 - d) Close partnerships with local communities, including local government, civic organisations, employers' and workers' organisations and alignment of programmes with their needs;
 - e) Partnerships with government's community development projects;
 - f) Local community participation in governance; and
 - g) Collaboration and articulation with other sections of the post-school system.

What is clear from an analysis of the policy document is that it has no or only a very weak link with the principles and with the overall objective, purpose and results or outputs of the retrospective ToC.

The results/outputs/impacts are not particularly evident, clear or even necessarily appropriate in the policy draft. The assumptions that lie behind particular implementations are not specified in this policy, as neither are indicators or criteria of success. Certain assumption can be inferred, but they are not stated, for example, one that the bureaucratic arrangements for the function shift of the PALCs into DHET control will somehow improve delivery, though what guides or justifies such an assumption is unclear.

No indication is given on how contradictions or duplications be addressed and the design does not consider any upscaling or replication needs.

In answering the question of whether the policy's theory of change is appropriate and sufficiently robust to address the needs of the identified youth and adults it is clear that there is a significant disjuncture between the policy and the *White paper* (and the retrospective ToC of the design evaluation) which envisaged a much more creative, diverse and contextually relevant system with community colleges, community learning centres, partner sites and open and distance learning, in a decentralised and network type system responsive to local needs.

There is also a major dissonance between the policy and the *White paper on post-school education and training* in respect of the so-called pilots.

The White paper envisaged nine new community colleges (presumably one per province) that were local and which took responsibility for a small cluster of previous PALCs in the local area.

3.2.6 Establishing community colleges

The DHET will undertake a planning and preparation process for the introduction of community colleges. Initially, nine new colleges will be piloted – one in each province, each starting with a cluster of PALCs. The pilot process will be closely monitored and evaluated to assist the DHET in resolving a number of issues, including management systems, core teaching and administrative staffing requirements, curriculum, minimum numbers of learners, governance arrangements, basic facilities, infrastructure and funding requirements, and quality assurance arrangements. Lessons from the pilot will inform how the community colleges and their campuses will be phased in throughout the country.

To ensure that community colleges continuously improve the quality and standards of the education and training that they provide, a monitoring and evaluation division of SAIVCET will be established – see Section 3.4 below.

In other words they were to be genuine pilots of a new type of institution.

By contrast, the policy document prioritises the establishment of nine so-called community colleges that are simply a function shift apparatus of renaming the existing system of PALCs in the province administered by a provincial Directorate as a community college administered by nominally national DHET staff. These apparatus cannot in any sense be conceived of as a means of piloting a system of local community colleges.

The policy does indeed talk of establishing an initial 18 community colleges: “7.3 The first 9 Community Colleges will be a merger of the current public adult learning centres and the Minister may further establish another 9 fully-fledged Community

Colleges as part of a pilot process.” The devil in the detail of the sentence is in the two words “will” (for the PALC function shift apparatus) and “may” (for genuine pilots of genuine community colleges).

3. To what extent is the policy measurable, and therefore capable of being evaluated in the future?

No specific target groups and their numbers are mentioned except for the vague “eligible youth and adults” who, certainly initially, will be served by “face-to-face” institutions until in the longer distance education capacity will be considered.

Overall the policy speaks of expanding enrolments “as these institutions are built” from 265 000 (the DHET’s estimate of the numbers currently attending PALCs) to one million students by 2030.

Given the importance of data and data management systems in measuring policy implementation achievements, the lack of any discussion on improving or building an effective data system (given the known failures in current PALC data management is noticeable (except for saying that. Community colleges must submit standard information to the DHET).

Where there is specificity – in the instant creation of the nine interim community colleges to nominally hold the PALCs – the measurement is trivial. We have been assured that legally speaking the “merger” of the PALCs into these colleges will be done almost instantly.

The possibility of the nine “real” pilots has no timelines or scale criteria.

In summary, the policy as currently constructed is not measurement or evaluation friendly.

4. To what extent is the policy ready to be implemented? That is, is there sufficient evidence that the resources and capabilities required to implement the policy, are in place and are adequate to address the scale of the policy challenge?

In legal terms the limited policy is ready to be implemented.

However, policy provides no “framework that must guide the management of the shifting of the Adult Education and Training function from the PEDs to the exclusive competence of the Department of Higher Education and Training.” (Section 4.1). Certainly this legal slight of hand that is the means to effect this function shift suggests that the policy only envisages the PALCs operating as they always have and hence there is little evidence of them moving “into the emerging community education sector”.

The framework for “the establishment of Community Colleges, governance and management of these institutional types, employment of staff, the funding framework, programmes and qualification offerings, quality assurance, examinations and assessment, and monitoring and evaluation.” is presented in only the barest of detail. By comparison the *White paper on post-school education and training* is, in far fewer pages, much more detailed and helpful.

How Community Learning Centres will be managed is nowhere specified (except that a Head can be appointed by the Minister). Given the importance that Community Learning Centres have in the *Task team report* of 2012 and the *White paper on post-school education and training* this is perplexing.

There is no mention in the draft policy of an implementation plan.

There is no policy on the programmes to be offered except in the most general of terms in Section 13. Community colleges have to be flexible in their offerings, offer programmes driven by community development priorities as well as state priorities, and programmes that respond to the immediate needs of the community (but which must be funded by other sources) and non-formal programmes, be holistic and within an integrated development framework.

The key implementation problem is not the instant merger of PALCs into a number of mega “community colleges” and the appointment of a principal for each, it is the creation of some genuine (i.e. locally based) community colleges (subject to resource availability).

There is no adequate conceptualisation or planning for the actual development of genuine pilot community colleges. The policy even states that “Details with regard to governance and management structures will be finalised after the conclusion of the pilot process.” And that the “pilot process will be closely monitored and evaluated to assist the DHET in resolving a number of issues, including management systems, core teaching and administrative staffing requirements, curriculum, minimum numbers of learners, governance arrangements, basic facilities, infrastructure and funding requirements, and quality assurance arrangements. Lessons from the pilot will inform how the community colleges and their campuses will be phased in throughout the country.” This suggests the absence of a clear plan and implementation strategy (though of course monitoring and evaluation are good things in themselves).

There are no plans for curriculum or materials development or ICT development..

There is nothing on practitioner development (compare the *White Paper*)

There is no risk management plan.

When it comes to the financial aspects of implementation it is difficult to make a judgement as there are no financial estimates in the policy at all. All that is stated is that the community colleges will be funded “in accordance with National Norms and Standards as provided for in terms of section 23 of the FETCA, 2006, as well as through other funding streams as identified in section 24 of the Act.” In addition it states that “the funding norms for public Community Colleges will during the transitional period from PEDs be the funding convention as currently in operation in each Province”. This is highly problematic as, first, the experience from the merger of teacher training colleges into universities and the function shift of FET colleges to national is that the amounts of money realised from these transfers were inadequate and part of a highly contested and still unresolved process, and second, that these funding norms were already totally inadequate for the existing PALCs and cannot possibly fund the erection of a new system of community colleges.

The *White Paper*, by contrast envisaged a much more diverse route for funding. Another useful comparison is the Implementation plan documents of the *Kha Ri Gude* literacy campaign which provided a detailed costing and budget.

Given all the above, it can be argued that the policy is not ready to be implemented.

However, are there indications that the DHET has the drive and planning capability to achieve the policy? Is the policy actually owned by the DHET?

Interviews revealed that DHET bureaucrats (in the Adult Education and Training Directorate and in the people responsible for the function shift) do own the policy. Other DHET officials interviewed either generally knew little about the policy, though they approved of the White Paper perspective (and as seen in the Principles in Section 2.1).

Adult education Directorate staff who previously served in Provincial Education Department adult education directorates or units did not own the policy and stated that they had not been adequately consulted.

5. How can the policy be improved?

On the community college policy

The draft policy should be replaced by a more substantive policy on Community Education and Training developed during 2015. It would be far better to develop a genuine policy on community education alongside the development of some pilots with varied structures and with more detailed planning of the details of a comprehensive policy.

The complexity of the proposed form of the community college must be signalled in such a document both in terms of funding provision and criteria established for success.

A framework needs to be spelled out of what is to be done to build the capacity of the DHET to cope with this extremely complex undertaking and ensure that structuring and decision making occurs in ways which are sensitive to local conditions.

The supply of professionally trained adult educators is a major and essential undertaking if the colleges are to function adequately. A procedure to ensure that universities will gear up their capacity (or revive what they allowed to decline) is needed.

The funding formula must include support for education and training that does not necessarily lead to qualifications in order to signal strongly the importance of full, part-qualifications, and learning that does not necessarily lead to qualifications.

A monitoring and evaluation framework for the pilot implementation phase is developed before implementation commences to ensure that the deliverables and timeframes are clear and that lessons can be extracted and documented to inform the full implementation of the new community college system.

On the function shift of the PALCs

A rapid development of a detailed implementation plan for the function shift of the PALCs from provincial education department to DHET administrative and directoral control should be undertaken.

Such a plan should incorporate the concept of regional Adult Education and Training offices that would continue to administer and support the existing PALCs.

This is not just a matter of administration but of supporting the improvement of teaching and learning and success in these centres.

The State President should be asked to delay proclamation of certain the Further Education and Training Colleges Act, 2013 (Act No 1 of 2013) clauses (insofar as they refer to PALCs being mechanically being re-labelled as community colleges).

There should also be a policy for the pre- and re-skilling of educators serving in the PALCs.