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RPL Policies and Practices: Reality Challenges

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1. AIM AND OVERVIEW OF THIS PAPER

RPL has long been on the agenda as a key tool for the transformation of education and training as envisaged by the NQF. As learnerships unroll, we begin to move from development of RPL policy to implementation of RPL practices. The reality challenges which face us will help us adapt and refine policy and practice in the interests of developing workable and effective RPL strategies.

RPL of the required fundamental learning areas in qualifications raises specific policy and implementation questions, some of which may be unique to the nature and role of the fundamentals and some of which may apply to RPL in other contexts. The first two sections of this paper give a description of the policy background and implementation context, while the third section unpacks issues emerging through practice. The paper does not provide answers or present the specifics of an approach, but aims to raise questions for informed debate in the area of RPL policy and practice.

2. THE CONTEXT

2.1 The role of the Fundamentals in industry qualifications

Unit standards-based qualifications are built up through the three categories of Fundamental, Core and Elective. These categories represent different components of a qualification, generally through making distinctions between the functions of these components within a qualification.

The Fundamentals generally refer to the fields of Communications and Language Studies (CLS) and Mathematics and Mathematical Literacy (MML), but SAQA accepts that the Fundamental category can include other learning and skill areas for specific qualifications. For example, Financial Literacy is a compulsory fundamental in all insurance qualifications.

SAQA requires that all learners awarded registered qualifications at NQF Levels 1-4 achieve 20 credits in the field of CLS and 16 credits in the field of MML at NQF Level 1, the latter requirement being extended to NQF Levels 2-4 by 2002. In essence this means that the achievement of some outcomes in CLS and in MML are compulsory for the award of a GETC at NQF Level 1, for the award of any qualifications pegged at NQF Levels 2 and 3, and for progress through the FET band up to NQF Level 4. Review of these requirements is in progress.

Principles

The principles that SAQA had in mind with these requirements were:

- emphasizing the **foundational** nature of language and maths: language competence is essential for learning across the curriculum, while mathematical competence/ literacy is essential to pro-active understanding of work and life;
- establishing a sound basis for lifelong learning through ensuring that all learners are able to achieve specified levels of competence in these two key general education areas;
- bringing education and training together through ensuring **parity** of educational competence in these areas whatever the learning environment (e.g. schooling, technical college, workplace);
- ensuring that competence in these areas is **portable** if learners choose to change educational or workplace direction in this phase.

A key assumption underlying these principles is that the achievement of these outcomes, by different kinds of learners, for different purposes and in different contexts, is comparable or equivalent in terms of *level and content*. There have been many debates around the issue of whether all learners in different contexts (workplace, schooling etc) achieve *the same* 20 language or 16 maths credits (i.e. from the same unit standards) at NQF Levels 1-4, or whether a selection from different banks of standards is in place. Currently there is ONE set of language credits at NQF 2-4 totalling 15 credits, with a few options for the remaining 5 credits in CLS; and TWO sets of Maths credits, one called Mathematical Literacy which is supposed to be more workplace focused and one set called Mathematical Sciences. The issue of maths is currently under review, and SAQA has called for an evaluation of the existing standards and review of its requirements. Further comment is made on this below.

Current Implications for SETAs awarding or endorsing qualifications:

- The final qualification cannot be awarded until a learner has achieved the required fundamental credits (OR their equivalent) at the level of the qualification.
- Those learners who do not have equivalents need to be RPL'd or put through a learning programme.
- Learners disadvantaged in terms of formal education could take a long time to achieve these credits.
- There are unanswered questions in relation to NQF Level 4 industry qualifications and legal requirements for the award of an FETC certificate.

2.2 THE IEB's ROLE in relation to RPL

The IEB is an assessment agency that works across schooling and adult education and training. In relation to the adult field, we assess ABET Levels 1-4, that is up to and including NQF Level 1, and NQF Level 4 through the ASECA curriculum. For these certificates we are registered with Umalusi and quality assured by them. We also offer placement assessments and RPL for the fundamentals at NQF Levels 2-4 in the context of industry qualifications. There are ongoing debates related to quality assurance for these offerings. We also offer assessor training (including RPL) through our ASSET company which is accredited by the ETDP SETA.

The focus of this presentation is very specific. Firstly, we are talking about RPL of individual unit standards or sets of unit standards, namely those for Communications and Language Studies, Mathematical Literacy and Financial Literacy (all these standards are assessed in English). We are not talking about RPL of entire qualifications. Secondly, we are talking in the FET band, that is, NQF levels 2, 3 and 4, although NQF 1 could also be relevant. Thirdly, the delivery context at present is that of learnerships, and we are therefore talking about industry qualifications. Fourthly, out of all the various purposes of RPL, the purpose of this RPL is for certification, that is, the award of SAQA registered credits towards a qualification.

I want to illustrate the emerging RPL 'reality challenges' in two smaller contexts within this broader focus: one is the RPL pilot project we are running with the INSETA, and the other is the issues we are encountering when we enter RPL discussions with other SETAs or providers for other SETAs.

The INSETA pilot

The INSETA raised its concerns about the fundamentals with the IEB two years ago. These concerns took three forms:

- (i) who would provide and who would quality assure the fundamentals in their qualifications for those who did not have equivalent credits;
- (ii) how could they be assured that 'equivalent credits' (ie senior certificate symbols) were in fact 'equivalent', and represented the levels of language competence and maths literacy competence required by their industry; and
- (iii) how could they standardize the achievement of financial literacy as required credits across all their qualifications?

The registration and implementation of learnerships was slow (as for all sectors). What soon became apparent was that companies were very unwilling to go to the trouble of conducting learnerships (whether at NQF Levels 2, 3 or 4) without stringent selection

criteria which generally included a minimum of a senior certificate with maths as well as language, and often selected graduates (e.g. B Coms, or those with marketing diplomas). To put it simply, companies were selecting those with high levels of general education but little insurance knowledge; or those already in the industry (also with high fundamentals) who wished to enter a more specific career path.

However, the INSETA still wanted to go ahead and look at the actual competence of these learners, and also address the issue of financial literacy which candidates did not have in their senior certificates. To this end we decided to take an RPL approach to the fundamentals through the pilot, although there was no legal necessity to issue unit standards-based credits to replace the senior certificate equivalences. (Learners were informed of this.) The pilot uses a portfolio and challenge approach, and has already assessed over 80 learners across the three learning areas in 7 different companies in learnerships at NQF Levels 2 and 4. (Please note that because of the INSETA's concession from SAQA regarding maths literacy, all maths assessments have been done at NQF Level 2).

In essence, then, this RPL pilot (with the exception of the financial literacy component) is in some ways an anomaly in that we are using RPL to assess learners who already have the legal equivalent of competence at this level. (Issues of equivalence will be raised later). This does not mean to say, however, that we have not learned a number of interesting lessons which we will delve into later on.

Other sectors

The INSETA is a sector that recruits learners for professional pathways, and hence tends to focus on those who already have the fundamentals in place. Discussions around placement or RPL with training providers or SETAs in other sectors which focus more on technical or trade competence have brought out very different concerns. Generally, these sectors find their learners' competence to be the other way round: their technical or trade competence is high (and these are the learners who have often achieved competence through experience, and need to be RPL'd against core and elective standards), but their Fundamental components are sadly lacking. For these learners we have been recommending placement assessment before RPL (placement is cheaper and quicker than RPL), as the chances are high that many of these learners will not achieve the fundamentals, in particular maths literacy, anywhere near the level of the qualification at which their learnership is aimed. Placement can indicate where top up training prior to RPL or even full learning programmes are needed, if industries delivering learnerships are prepared to do this.

I have sketched out a descriptive context for the delivery of RPL of the fundamentals. Before going on to unpick the implementation issues, a brief overview of the policies and principles which should frame RPL practice is given.

2.3 Key policies and principles

The following is extracted from the SAQA policy document **RPL in the context of the NQF** (September 2002)

“Recognition of prior learning means the comparison of the previous learning and experience of a learners howsoever obtained against the learning outcomes required for a specified qualification, and the acceptance for purposes of qualification of that which meets the requirements.” (page 3)

“To, through assessment, give credit to learning which has already been acquired in different ways.” (page 11 , quoted from Criteria & Guidelines for Assesemnt of NQF registered unit standards & qualifications, October 2001.)

The NQF objectives relevant to RPL are:

- Facilitate access to, and mobility and progression within education, training and career paths
- Accelerate redress of past unfair discrimination in education, training and employment opportunities.

Two other important principles extracted from this document are that the RPL approach should:

- Address the visible and invisible barriers to learning and assessment
- Be viable, sustainable and credible.

Transformation features:

The document gives a list of transformative features of RPL, which are put forward in the spirit of an ideal towards which the system must strive in an incremental way. A few comments are made in relation to these features.

1. ‘A holistic approach’: RPL is not a purely technical process, but individualized and contextualised, learner centred and developmental. What does this mean in the context of RPL for credit purposes, where issues of portability, transferability and standarisatation are relevant? Recognition of diversity of knowledge and learning styles is also something that is easier to do in the context of a learning

programme and ongoing assessment than it is in what is, essentially, a summative assessment of competence.

2. “Developmental and incremental approach to implementation”: RPL must be able to use existing infrastructure and resources, and work towards measurable targets.
3. “Different contexts for RPL implementation”: The different contexts and purposes for RPL may mean that common criteria for quality assurance are difficult to implement.
4. “Access and redress”: These are the key functions of RPL.
5. “Dynamic nature of construction of knowledge”: this raises interesting questions in relation to standardized assessment against standards, moving towards ‘rough equivalence’ to standards, and the necessary evolution of standards.

3. REALITY CHALLENGES

The previous two sections offered descriptive sketches of the policy background and context in which we deliver RPL of the fundamentals. This section outlines the issues and challenges which are emerging in our RPL practices.

3.1 Legal & status issues

Equivalence:

To our knowledge, SAQA has not taken a formal position on the issue of equivalence. Certainly it would seem unfair to learners (and possibly illegal) to devalue their achievements in a senior certificate, which should represent competence at NQF Level 4. However, it is also true that senior certificate symbols can represent a wide range of competence, whereas registered standards pin competence to a particular level. In the case of language as an example, an English (or any other language) 1st language symbol of A or B represents a very different competence to an English 2nd language D or E. IN the same way maths achievements at standard or higher grade are differentiated. It is also a widely acknowledged fact that many learners who have a senior certificate (and even above) come out at levels much below NQF 4 when assessed for applied competence in the workplace in either language or numeracy.

There is also a difference in what the standards represent. In the INSETA pilot we found that all the candidates (the majority of whom are not 1st language English speakers) achieved the language standards to a high level. Interestingly, though, those who had

been in the workplace for a while as opposed to those who had newly left school coped better with the ‘workplace application’ language uses which are built into the new standards and which we assess. In relation to the maths, many of those who had maths in their senior certificates did not achieve competence in the NQF Level 2 maths literacy assessment, primarily because they were not familiar with the problem-solving, contextualised applications of these standards.

The implication is that the acceptance of equivalence means that learners with unit standard credits and learners with senior certificate credits have in fact different levels and kinds of competence in the fundamentals even if they have achieved the same qualification. The debate needs to focus on whether and to what degree this a problem, and what developmental strategies can be put in place to address this.

Core and elective levels vs fundamental levels

Gazetted SAQA requirements state that learners must achieve the fundamentals to the same level as the qualification which they obtain. As we noted above, there are very real and valid reasons why the Fundamentals are often out of sync with the core and elective skills components. This raises the question as to why we assume that the fundamentals should be at the same level as core and elective areas. The two extremes noted above illustrate the question: those who have a sound secondary or even tertiary level of education may enter a sector or profession which is entirely new to them, in which case they would probably do a learnership at NQF Level 2. On the other hand, those who have been engaged experientially in technical or trade pursuits have often reached a technical level of competence without being able to give formal evidence to the required standards in relation to the fundamentals. The first category is not problematic. The second category of learners raises other issues in relation to the fundamentals, namely:

- What if the trade or profession genuinely does not require applied competence to the same level as the technical components?
- Should there be banks of different kinds of standards in Communications (e.g. some with more oral emphasis, some with emphasis on writing skills depending on the demands of the sector?) and Maths Literacy (e.g. some that focus on physical calculations, others that focus on statistical manipulation?)

These debates are not new. The first point made suggests that SAQA needs to revisit its qualification requirements; the second point goes back to the whole issue of ‘industry-specific’ communication and maths standards, and means that SAQA would have to re-look at its ‘minimum standards to avoid duplication’ approach. In relation to Maths, SAQA has in fact made the very welcome move of opening the doorway to debate on both approaches. They have invited submissions on the question “What type, levels and credits of Mathematical Literacy are required for NQF 1-4 qualifications?”, and have provided a detailed questionnaire and set of options for response.

Both pathways have advantages, but both raise further questions, specifically about portability of standards and transfer and application to other contexts. For RPL, for example, banks of industry-specific standards would mean that there could be no generic process or instrument to assess a learner's competence, as each RPL event would have to be highly contextualised. What implications does this have for cost and viability of RPL provision?

Finally one other point needs to be made in relation to the role the fundamentals play. While we have argued above that in some contexts there are sound reasons to select learnership candidates with high level fundamentals for learnerships in the FET band, there does seem to be a disturbing trend of a widespread use of the senior certificate as a selection criterion for any learnership, precisely in order to avoid issues around the fundamentals, and to facilitate RPL of the core and electives. There are implications here that the Department of Labour might want to look at in relation to its skills development strategy.

3.2 Process issues for RPL

A lot is always said about the importance of process in RPL. RPL is not an event, it is a process which requires preparation, a range of support mechanisms, and a result that ideally should engender positive further consequences (i.e. not retrenchment, but access into further training and career pathing). But the conceptualization of these processes and consequences may take very different forms depending on the purpose and context of RPL. The COSATU RPL 2000 document, for example, states that 'For RPL to effectively lead to opportunities for workers, it is important that at the end of the RPL process the learning gaps are linked to actual courses or learning opportunities'; and 'RPL should be linked to the process of restructuring the workplace, so that workers are able to utilize their skills and be rewarded for this'. In higher education where RPL might be used for access and fast tracking, the emphasis will be different: RPL will be judged effective where support and processing of learners results in good throughput of RPL entrants, for example.

In other words, different contexts and purposes for RPL engender different power relations between those involved. One of the questions that has arisen in our RPL work is how far does our accountability – that is, the IEB as a provider of RPL assessment – extend in respect of these power relations, and in relation to the processes that should characterize good RPL practice? In short, what do we have control over and what can we not control? And how does time and effort equate with cost of service?

To sketch the scenario in more detail: COSATU's RPL policy contains implementation steps, which range from consultation and mandates between union and management, to setting up of joint committees and support structures, to operationalisation of linkages and evaluation of the process. Higher education RPL processes often involve linkages across departments, and setting up of counseling and support services. In one way both of these are 'institutionalised' RPL, in that the players are all closely connected and operating within their own environment. But what of the external assessment agency who is called in by a client to provide a specific service within a limited time frame and at a reasonable cost?

If we take the SAQA document's core criteria for quality assurance of RPL, we can see that it is 'institution/ workplace focused' in the way described above. Some of these criteria are, however, beyond the control of an assessment provider such as ourselves, and I suspect many others here who are servicing learnerships in a range of companies for specific contracts. The two main issues here are linked to the first two quality areas put forward in the SAQA document:

- *Quality indicators for institutional policy and environment:* in the workplace this could involve issues such as information giving and negotiation on the reasons for RPL, or process issues such how much time off candidates are given, whether RPL takes place during working hours or partly in own time, whether paid leave is given, who provides transport to venues etc. However, the client of the assessment provider is usually the company offering the learnership: the arrangements for the learnerships, and the agreements in place between management, union and learnership candidates are not within our control. We advise our clients to discuss and agree on the purpose of RPL with their candidates before entering them into the process, and we recommend that most of the RPL portfolio process be done in working hours. However, we cannot insist on this – otherwise we would probably have no clients.
- *Quality indicators for services and support to candidates:* again, the criterion assumes the existence of 'student services' or HR practitioners. How these are deployed within an institution or a workplace is not within the control of the service provider. We offer some support services, namely an initial guidance RPL workshop and support materials, and would like to make available a candidate query line in the future. But the degree of support candidates receive from their own line managers and co-ordinators *during* the RPL process in the learnership is very variable.

In relation to the two criteria above, the pilot process has made it very obvious that those candidates who come from an enabling environment (they have been given time, they understand and are happy with the purpose of the RPL, and can discuss the IEB

requirements with their managers and learnership co-ordinators) have found the experience much more positive than those who have been left to sink or swim on their own.

The other quality areas of practice put forward in the SAQA document do not raise such problematic issues of accountability. They are:

- Training and registration of assessors: we are using our own assessors who are either certified assessors or in process for this.
- Methods & processes of assessment: again, this is mainly under our own control although implementation in the context of learnerships does raise some technical issues which will be noted below.
- QMS: moderation, management and reporting of the actual assessments are within our control.
- Fees: currently we do not service individuals, and fees are paid by the client. There are issues relating to fees which have to do with the degree of support and time investment by the service provider, which has to be looked at in relation to the credit value of the standards achieved through RPL and how much companies are prepared to pay for sets of individual standards. The fees are certainly lower than those for a full learning programme.
- RPL and curriculum development: we work very closely to the registered standards, and the pilot and the debates with other sectors have certainly illuminated issues around the standards themselves. Currently we do not have an ETQA or a SETA to whom we can report these observations, except in the case of the Financial Literacy standards.

A couple more brief comments on process issues:

- *Learnership planning*: the pilot has shown that very little attention had been paid to including the fundamentals in programme planning. This was partly due to assumptions that the fundamentals of many (but not all) candidates were already achieved in the case of CLS and ML. It did not, however, apply to FL, and sometimes no accommodation had been made for this in terms of either RPL or programme delivery. (In one extreme case we found that the start of the learnership, for currently employed learners only, coincided with their financial year end and these learners were not managing well with any aspects of their learnership.) In other sectors we have found that there are vague notions that the fundamentals can be 'embedded' in the delivery of the core and electives, but little thought is given to how these will be assessed and credited.
- *Learner and employer expectations and resistance*: In the pilot we have met with a range of reactions from both employers and candidates. Some clients (in the form of learnership co-ordinators in a company, who are often HR personnel or skills development facilitators) have been somewhat disgruntled to find that the RPL portfolio process requires time and application, and would have preferred a

set of quick challenge tests. Others have been very positive, and have seen the portfolio processes for communications and financial literacy as adding value to the learnership, in terms of developing core skills. In respect of the learners, 'external' candidates (i.e. not in current employment) have been far more enthusiastic about the RPL process and their learnership in general than those in currently employed by their companies. The reasons for this are fairly obvious: learners in employment have job pressures to contend with and possibly some managers who are not sympathetic. On a couple of our site visits to assess oral competence learners did not present themselves at the appointed time because they had work-related commitments, which they said took priority.

3.3 Technical issues

I will briefly mention a couple of these issues which may be relevant to RPL in the context of other kinds of skills and knowledge, or may be peculiar to the 'general education' orientation of the fundamentals. First, there is the problem of scope of assessment. End of course assessment linked to a learning programme generally samples across the standards that have made up that programme: ideally, there should have been ongoing assessment, some of which has been recorded for formal certification purposes. The programme summative assessment is a check on the overall achievement of the learner. RPL, however, is not linked to a programme. It is actually not feasible to assess every single outcome of a unit standard or set of unit standards, especially in relation to the credit value of a standard or set of standards, and how much time learners can afford to spend on this. For example, one of the financial literacy unit standards at NQF Level 4 is 'Investigate the possibilities of establishing and running a small business enterprise'. There are four outcomes which include a research component, a risk analysis, an explanation of financial aspects of SMMEs and a rationale for setting up an SMME. Each outcome has a detailed set of assessment criteria. Our initial attempt to generate evidence requirements resulted in what would have been a very nice set assignments, each one in itself a project, in the context of a learning programme; however, it was simply not feasible in relation to RPL of one unit standard worth only 3 credits. So we have taken the view that as RPL assumes competence, evidence that represents integrated outcomes (either within standard or across a set of standards) is acceptable. Perhaps this may not be true of technical competence, especially with issues related to safety or emergency procedures where all outcomes must be assessed.

One ideal of RPL is that learners can present 'real life' evidence that meets the outcomes. We have found in other assessment contexts that this is very problematic: even with clear guidelines learners do not know what constitutes real evidence; specific outcomes are sometimes so embedded in such evidence that they are difficult to assess; evidence presented is often insufficient; and there is a lack of comparability between learners.

What we have tried to do rather is set activities that draw on real life evidence AND demands the demonstration of specific skills.

Another technical issue relates to reporting of credits against standards. The financial literacy standards are assessed individually (although the evidence is presented in one portfolio), because there is a choice of different standards to meet the qualification requirements. However, with the CLS standards, for example, there has to be an integrated assessment activity because of the nature of these standards. The CLS standards are organized into reading, writing, and speaking and listening. You cannot assess reading without writing and vice versa, although the oral competence standard could stand alone. Generally, however, our evidence requirements assess the standards that make up the 20 required credits through one integrated task making up the portfolio. Maths literacy is currently assessed through a challenge assessment, which in the interests of feasibility (given the number of dependent unit standards there are) samples across outcomes.

In sum, most of the technical issues arise because of the nature of the standards, and reality constraints in terms of the time available as weighed up against the worth of credits achieved.

4. Emerging questions

What follows is a random selection of questions for debate:

- Are the current requirements in relation to the Fundamentals (whether achieved through learning programmes, RPL or equivalence) hindering access and putting up barriers to learning and progression? If so, what are the options to address this? (SAQA's maths literacy investigation is an example of a strategy to address this.)
- How do service providers determine their own levels of accountability in relation to good practice RPL in contexts such as contracts with companies that have their own institutional dynamics?
- How is good practice RPL balanced against issues such as credit values, time constraints and costs?
- How do service providers ensure that selected candidates put forward for RPL are actually entered at the right level before embarking on a costly RPL process?
- How does RPL balance stringency in relation to awarding credit for standards with a developmental approach which accommodates different kinds of knowledge?
- What constitutes sufficient evidence to determine competence at a level? Related issues are: how do you assess ongoing performance through RPL; how do you assess critical outcomes through RPL; what is the relationship between

knowledge and experience; and how are 'levels of performance' within an NQF level assessed?

In conclusion, I hope this tour through the complexities of RPL of the fundamentals is relevant to those of you concerned with RPL of more technical areas, or of whole qualifications in an institutional or any other context. RPL of the fundamentals for credit purposes certainly bring up specific policy and implementation challenges; the challenges for other forms of RPL, and for other purposes for RPL, will inevitably focus on different issues as well as on some common areas of concern.

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