

**EVALUATION AND ACCREDITATION
UNIT**

**REPORT ON
ACCREDITATION AND MONITORING OF
INDEPENDENT SCHOOLS**

**FOR THE
PERIOD
01 APRIL 2019 - 31 MARCH 2020**

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ABBREVIATIONS AND ACRONYMS

ACC	Accreditation Committee of Council
AAC	Accreditation Appeals Committee
A&C	Accreditation and Coordination
CEO	Chief Executive Officer
DBE	Department of Basic Education
CAPS	Curriculum and Assessment Policy Statements
E&A	Evaluation and Accreditation
EMIS	Education Management Information System
EXCO	Executive Committee of Council
GENFETQA	General and Further Education and Training Quality Assurance
GFETQSF	General and Further Education and Training Qualifications Sub-framework
HEDCOM	Heads of Education Departments Committee
IAC	Internal Accreditation Committee
IS	Independent School
LOI	Letter of Intent
NCS	National Curriculum Statement
NQF	National Qualifications Framework
NSC	National Senior Certificate
QP	Quality Promotion
SACE	South African Council for Educators
SBA	School Based Assessment
SE	Self-evaluation

EXECUTIVE SUMMARY

The Independent Schools (IS) sub-unit is one of the three (3) operational sub-units in the Evaluation and Accreditation (E&A) unit that provides for the quality assurance of provision and assessment through evaluation and accreditation of private education institutions and assessment of private assessment bodies. This entails ensuring that:

- Standards for provision are determined, maintained and strengthened;
- Systems are in place to quality assure the capacity of private education and training providers seeking accreditation to implement qualifications registered on the General and Further Education and Training Qualifications Sub-Framework (GFETQSF), through an accreditation and monitoring process;
- Systems are in place to quality assure the capacity of private assessment bodies seeking accreditation to assess qualifications registered on the GFETQSF.

The IS sub-unit is responsible for the evaluation and monitoring of independent schools offering the curriculum leading to a qualification registered on the GFETQSF. The National Senior Certificate (NSC) is currently the only qualification registered on the GFETQSF which independent schools may be accredited to offer.

Independent Schools that intend to offer the curriculum leading to the NSC (that is, the National Curriculum Statement) must be accredited by Umalusi. The accreditation process comprises a number of steps, namely:

- Letter of intent to apply for accreditation;
- attendance of a Quality Promotion meeting;
- self-evaluation;
- desktop evaluation of the self-evaluation report by Umalusi;
- site verification visit;
- consolidation of the reports into an accreditation report;
- consideration of the application by the Accreditation Committee of Council and their recommendation of an accreditation decision; and
- approval of the accreditation decision by the Umalusi Chief Executive Officer on behalf of Umalusi Council.

The outcome of an application for accreditation by an independent school can be accreditation, two (2) years provisional accreditation, or no accreditation. If an institution is found not to meet the minimum standards for accreditation at the first presentation of the report to the Accreditation Committee of Council (ACC), it is granted a reasonable period ("window period") to improve on its submission to meet the requirements prior to the accreditation decision being made. During this "window period" schools are required to address the conditions that deprived them of accreditation, and maintain the standards that were in place at the original site visit. Schools submit improvement reports that are evaluated and presented to the Internal Accreditation Committee (IAC) and then the Accreditation Committee of Council (ACC) for recommendation of the outcome.

This report contains information on the following quality assurance of provision processes:

- Background and legislative information (Chapter 1);
- The accreditation process and activities of the sub-unit (Chapter 2);

1. BACKGROUND

1.1 Strategic Objective

The independent schools sub-unit is part of the Evaluation and Accreditation unit of Umalusi which falls within Programme 3: Quality Assurance and Monitoring. The strategic objective of the Evaluation and Accreditation unit is to quality assure the private provisioning of the qualifications registered on the GFETQSF.

1.2 Purpose

The purpose of Programme 3 is to ensure that the providers of education and training have the capacity to deliver and assess qualifications on the GFETQSF and are doing so to the expected standards and quality. Specifically, the purpose of the Evaluation and Accreditation sub-programme is to provide for quality assurance of provision and assessment through evaluation and accreditation of private education institutions and private assessment bodies.

1.3 The scope of the E&A Independent Schools (IS) sub-unit

The Independent Schools sub-unit evaluates and monitors independent schools that offer the NCS leading to the NSC. This is done through desktop evaluation and site verification visits. The evaluation reports are consolidated and presented with recommendations to the Accreditation Committee of Council (ACC) for consideration.

The sub-unit is led by the Manager who oversees the work of the sub-unit, and reports directly to the Senior Manager: Evaluation and Accreditation, who in turn reports to the Executive Manager: Quality Assurance and Monitoring. The Assistant Managers report directly to the Manager and are responsible for activities in the accreditation process within the sub-unit. The Administration Assistants assist the Assistant Managers to execute their allocated roles and responsibilities in the accreditation process.

The organogram outlining the reporting structure within the Independent Schools sub-unit is included as [Annexure A](#).

1.4 Legislation underpinning the work of the E&A Independent Schools sub-unit

The *Constitution of the Republic of South Africa* (Act No. 108 of 1996) provides for the establishment of independent education institutions that-

- (a) Do not discriminate on the basis of race;
- (b) Are registered with the state; and
- (c) Maintain standards that are not inferior to standards at comparable public educational institutions.

The *National Qualifications Framework Act, 2008* (Act No. 67 of 2008) provides for the establishment of Umalusi as a Quality Council that is responsible for the development and management of a Sub-framework of qualifications at Levels 1 to 4 of the National Qualifications Framework and the related quality assurance processes.

The said Act determines that the Quality Council must, in respect of quality assurance within its Sub-framework -

- (a) develop and implement policy for quality assurance;
- (b) ensure the integrity and credibility of quality assurance; and
- (c) ensure that quality assurance as is necessary for the Sub-framework is undertaken.

The *General and Further Education and Training Quality Assurance Act, 2001* (Act No. 58 of 2001, as amended) stipulates in terms of section 23(1),

The Council must develop policy and criteria for quality assurance of private education institutions.

- (2) Any institution that is required to register as –
 - (a) an independent school in terms of the South African Schools Act, 1996 (Act No. 84 of 1996);

must comply with the policy and criteria contemplated in subsection (1).

and section 25,

- (1) The Council must monitor private education institutions to ensure compliance with the policy contemplated in section 23(1).

- (2) If a private education Institution fails to comply with the policy, the Council must—
- (a) notify such private education institution In writing and set out the nature and extent of the failure; and
 - (b) determine a reasonable period within which the private education institution must comply with the policy.
- (3) At the expiry of the period contemplated in subsection (2)(b), the Council—
- (a) must evaluate the steps taken by the private education Institution to comply with the policy and take into account any submissions made by the education Institution; and
 - (b) may affirm the accreditation of the private education institution or withdraw the accreditation as from a date specified by the Council.
- (4) Before the Council withdraws an accreditation, it must notify the head of the department or registrar concerned, as the case may be, contemplated in section 24(1) of its intention to withdraw the accreditation and of the date of the intended withdrawal.

Other legislation pertaining to the work of the Evaluation and Accreditation Independent Schools sub-unit includes:

- (a) The South African Schools Act, 1996 (*Act No. 84 of 1996*);
- (b) Policy and criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies (*Government Gazette No. 35830 of 29 October 2012, as amended in 2017*).
- (c) Regulations regarding the criteria for the quality assurance, accreditation and monitoring of independent schools and private assessment bodies (*Government Gazette No. 41206 of 27 October 2017*).
- (d) The National Curriculum Statement Grades R – 12, which includes:
 - The Curriculum and Assessment Policy Statement Grades R-12;
 - The National policy pertaining to the programme and promotion requirements of the National Curriculum Statement Grades R-12; and
 - The National Protocol for Assessment Grades R-12.

- (e) Regulations pertaining to the Conduct, Administration and Management of the National Senior Certificate Examination (*Government Gazette No. 31337 of 29 August 2008 as amended*);
- (f) Regulations pertaining to the National Curriculum Statement Grades R-12 (*Government Gazette No. 36041 of 28 December 2012 as amended*).

1.5 Accreditation Criteria

Accreditation decisions are made on the basis of private education institutions meeting minimum standards in terms of the accreditation criteria. The approved criteria for an independent school to offer the National Curriculum Statement leading to the National Senior Certificate are:

- Leadership, management and communication
- School ethos
- Teaching and learning
- School results

2. THE ACCREDITATION PROCESS

The accreditation process comprises a number of steps, namely:

- Letter of intent (LOI) to apply for accreditation;
- Attendance of a Quality Promotion (QP) meeting;
- Self-evaluation by the independent school;
- Desktop evaluation of the self-evaluation report by Umalusi;
- Site verification visit by Umalusi;
- Consolidation of the reports into an accreditation report;
- Consideration of the application by the Accreditation Committee of Council and their recommendation of an accreditation decision; and
- Approval of the accreditation decision by the Umalusi Chief Executive Officer on behalf of Umalusi Council.

Umalusi acknowledges receipt of an application for accreditation once the independent school has submitted a completed self-evaluation report. The accreditation process can take up to 18 months to complete from submission of an application. A fee (approved by Umalusi Council) is charged per stage of the accreditation process. An independent school may not proceed to the next stage of the process until the payment is verified.

2.1 Letter of intent (LOI) to apply for accreditation

The “Letter of intent” (LOI) to apply for accreditation is the first step that the independent schools complete online. It is also a way of demonstrating the institution's intention to apply for accreditation. This can therefore not be perceived as an application for accreditation. Through the screening process that takes place with 7 days of payment, Umalusi is able to determine whether the institution falls within its mandate for accreditation. Umalusi’s mandate is to quality assure institutions that offer a qualification or programmes leading to a qualification registered on the GFETQSF. The National Curriculum Statement leading to the National Senior Certificate is currently the only school qualification registered on the GFETQSF. Therefore any school offering a qualification other than the NSC, is not able to continue the accreditation process beyond this step.

Table 1 and the graph below present the LOIs submitted in the three (3) financial years from 1 April 2017 to 31 March 2020. The number of independent schools that have submitted LOI since 1 April 2017 has dropped significantly from 189 to 100 in the 2019/20 financial year. Although most of the schools offering the CAPS have applied for accreditation, the number of schools that have not started the process remains high. This number include schools that are not offering CAPS and a few primary schools.

Table 1: LOI submitted between 01 April 2019 and 31 March 2020

	Q1	Q2	Q3	Q4	Total
No. of LOI received 2019/20	20	32	29	19	100
No. of LOI received 2018/19	28	29	10	25	92
No. of LOI received 2017/18	52	49	40	48	189
Percentage screened within 7 days of receipt of payment for LOI	100%	100%	100%	100%	100%

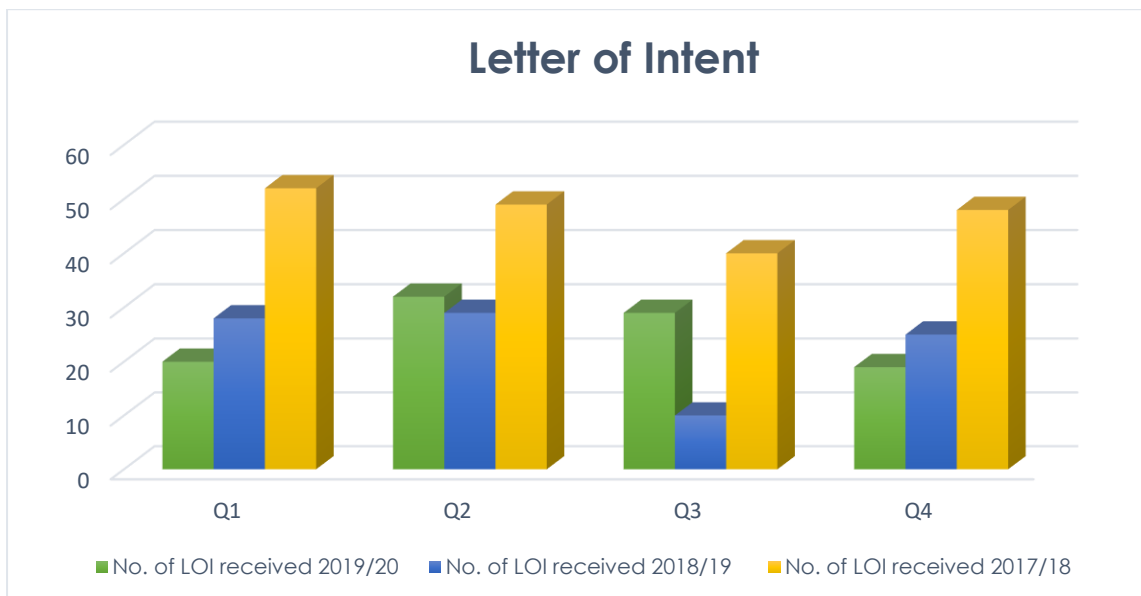


Figure 1: Letter of Intent submitted per Quarter

2.1.1 Areas of Strength

- (a) Schools may submit their LOI at any time during the year and have the opportunity to prepare for uploading the Self-evaluation instrument before the 30 August each year.
- (b) The system will only allow the school to continue with accreditation process if all the correct documentation has been verified.

2.1.2 Areas of Concern

- (a) The inconsistency of the type of information included on EMIS certificates provided by the different provinces.
- (b) The increasing number of schools that submit their LOI without being registered by the provincial education department.
- (c) EMIS registration documents that indicate that a school is provisionally registered by the provincial education department. With provisional registration, a school may not be granted full accreditation.
- (d) Independent schools that operate from premises different to those indicated in the registration certificates.
- (e) Independent schools that offer grades that they are not registered to offer.

2.1.3 Recommendations for improvement

- (a) Provincial regulations for registration of independent schools should be standardised and applied uniformly across the provinces.
- (b) Clear conditions to be met for full registration should be indicated on the registration certificates of schools granted provisional registration.

2.2 Self-evaluation report and Desktop Evaluation

Once the letter of intent to apply for accreditation has been accepted, independent schools are required to complete an online self-evaluation report and upload an accompanying portfolio of evidence to demonstrate their compliance with the minimum criteria for accreditation. The self-evaluation instrument is only available to an independent school once a representative of the school has attended a compulsory Quality Promotion Meeting, during which the entire process and requirements are explained.

Following the submission of the self-evaluation report, Umalusi, assigns trained evaluators and subject specialists online to evaluate specific criteria. Should the submission of the school be found not to meet the minimum standards, it is returned to the school to give them an opportunity to submit further relevant evidence, at the fee approved by Umalusi Council. The school is granted a maximum of two opportunities to resubmit the relevant evidence. If the evidence still does not meet the minimum requirements for accreditation after the two additional submissions, the application will be rejected. If the school still seeks accreditation with Umalusi, they will be required to make a new application and pay all the relevant fees. Schools whose submission is found to have met the minimum standards are accepted and considered to have applied for accreditation.

Regulation 26A(1-4) Chapter 5 "Requirements for the registration of independent schools as examination Centres" of the *Regulations pertaining to the conduct, administration and management of the National Senior Certificate (NSC) Examinations* (Gazette No. 31337 of 29 August 2008 as amended) states "In order for an independent school to be registered as an examination centre by either an accredited private assessment body or the state, such a school, besides being registered as a school, must also be accredited by Umalusi." Umalusi will therefore certificate only the learners who sat and fulfilled the requirements of the NSC at accredited independent schools or independent schools that have made considerable progress in their application for accreditation with Umalusi.

For schools to be indicated as compliant for the 2020 National Senior Certificate examinations, they were required to have submitted a self-evaluation report and made considerable progress in their application for accreditation by Umalusi by 31 August 2019.

Table 2 below indicates a comparison between the number of self-evaluation reports evaluated during the three (3) financial years; 2017/18, 2018/19 and 2019/20.

The same trend observed with the submission of the LOIs in the three (3) financial years is observed with the evaluation of the self-evaluation reports. The number of self-evaluation reports evaluated has dropped from 555 in 2017/18 to 233 in 2019/20. It should be noted that because processing of applications spans over different quarters, the number of

reports evaluated in a specific quarter is not directly related to the number of SE reports received in that quarter.

Table 2: SE evaluated

	Q1	Q2	Q3	Q4	Total
No. of self-evaluation reports evaluated 2017/18	79	273	43	160	555
No. of self-evaluation reports evaluated 2018/19	79	102	125	45	351
No. of self-evaluation reports evaluated 2019/20 (Section A)	4	12	45	10	71
No. of self-evaluation reports evaluated 2019/20 (Section B)	56	53	0	53	162

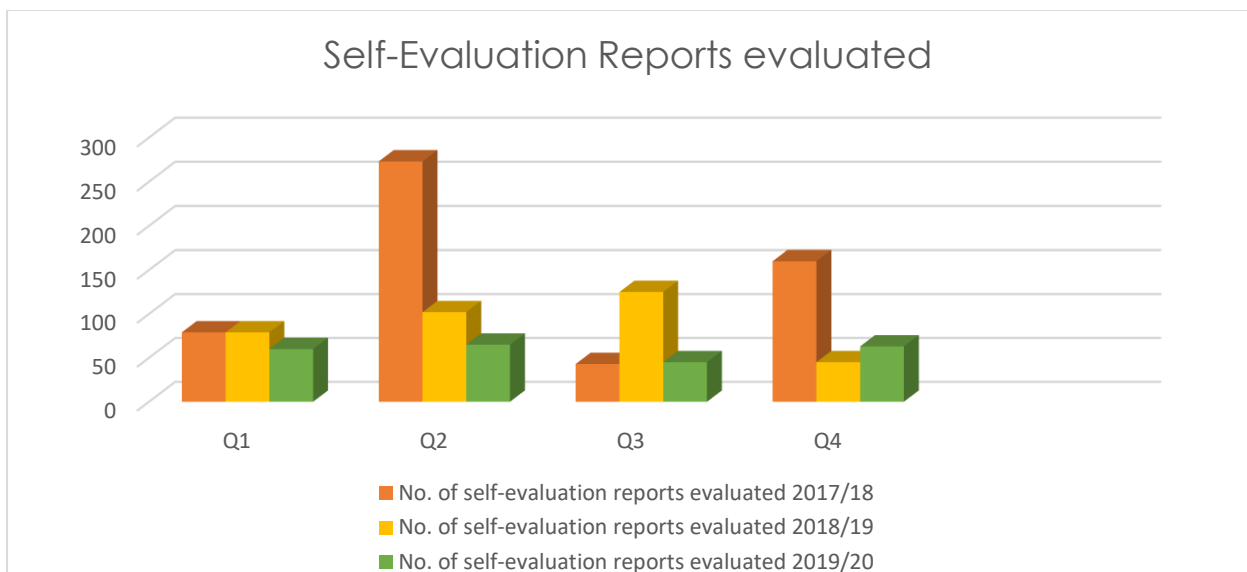


Figure 2: SE evaluated

2.2.1 Areas of Strength

- (a) Most of the schools submit self-evaluation reports and supporting evidence that meet the minimum standards at first attempt.

- (b) Schools experience minor or even no challenges when they upload evidence online.

2.2.2 Areas of Concern

- (a) Some schools submit outdated evidence
- (b) Some schools make use of the services of independent contractors to complete their self-evaluation report. Very often the evidence submitted in such cases is generic and not relevant to a particular independent school.

2.2.3 Recommendations for improvement

- (a) Continued emphasis to be made at the quality promotion meetings that schools must submit the latest evidence relevant to their own institutions.

2.3 Site visits

The site verification visit is a process that follows once a school's self-evaluation report has met the minimum standards at desktop evaluation level. The site visit is guided by the findings of the desktop evaluation process. The site verification visit is a key component of the accreditation process conducted by trained evaluators and subject specialists to verify the information provided by the school during the self-evaluation process. This verification includes amongst others: the school ethos, policies and procedures, financial viability, facilities, curriculum content and delivery, assessment practices, school performance and results. If a school markets their school as having boarding facilities, then the hostel facilities are also included in the site verification process.

Different sources of data collection are used during the site verification visit. These include lesson observation, physical inspection and interviews with the principal, management, teachers and learners, in addition to verification of evidence. The authenticity of the South African Council for Educators Certificates (SACE) are also verified through SACE. This verification process has contributed to the identification of fraudulent SACE certificates that are circulating in schools.

The plotting of site visits is dependent on the availability of the schools. Generally, schools, especially four (4) term schools, are reluctant to agree to site visits taking place in the last month of each quarter as they are in the process of conducting tests / examinations and preparing marks and schedules for reporting during these periods.

The statistics below show the fluctuation in the number of site verification visits conducted per quarter. Due to a low number of self-evaluation reports submitted and evaluated in the 2018/19 financial year, less initial site verification visits were conducted in all quarters of the 2019/20 financial year. The 231 site verification visits conducted in the 2017/18 financial year increased to 289 in the 2018/19 financial year and dropped significantly by more than 50% to 163 in the 2019/20 financial year.

Table 3: Site visits conducted per quarter

No. of verification site visits conducted	Q1	Q2	Q3	Q4	Total
2017/18	59	73	23	76	231
2018/19	97	106	24	62	289
2019/20	42	65	12	44	163

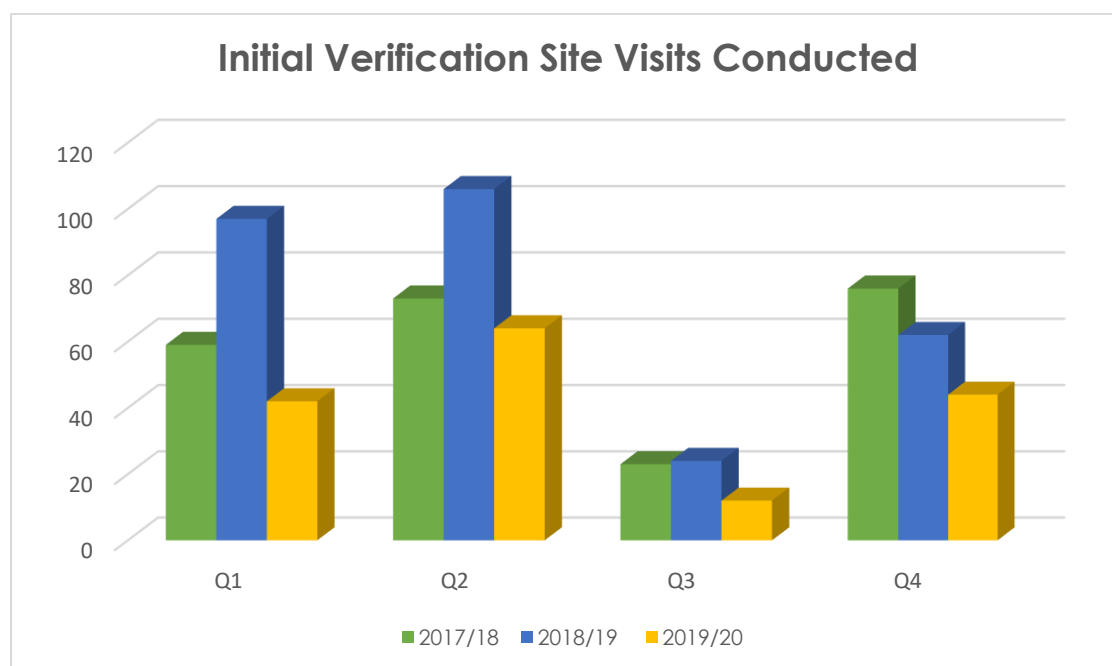


Figure 3: Site visits conducted per quarter

2.3.1 Areas of Strength

- (a) Due to the increased number of independent contractors appointed, schools that have paid for the site visits do not have to wait for long for the site visit to take place.
- (b) Successful site visits are conducted in a professional manner under the supervision of Umalusi officials.
- (c) The presence of Umalusi officials on site during the site visits has improved the collection of data, which leads to quality reports.

2.3.2 Areas of Concern

- (a) Most of the schools that have been visited in the 2019/20 financial year do not meet the minimum requirements for accreditation.
- (b) Some of the schools battle to demonstrate implementation of the evidence that they submitted during the self-evaluation process, which implies that the evidence submitted is not related to their own institutions.
- (c) In some cases, it is only discovered on the day of the site visit that the school has moved premises or is not offering the grades for which they have applied for accreditation. This despite considerable communication with the schools in preparation for the site visit.

2.3.3 Recommendations for improvement

- (a) The accreditation criteria must be strongly emphasised during the quality promotion meetings.
- (b) More guidance on how to demonstrate implementation of evidence submitted during desktop should be provided during the quality promotion meeting.
- (b) Schools must communicate any changes in site or grades offered prior to the site visit.

2.4 Consolidated Accreditation Reports to Accreditation Committee of Council (ACC)

The reports that are written during the desktop evaluation and site verification visit are consolidated into one accreditation report. The accreditation report is moderated and quality assured and a recommendation is made as to the outcome of the school's

application for accreditation. The accreditation recommendation is informed by the school's level of compliance to the indicators and criteria for accreditation. The consolidated accreditation reports are further moderated and approved by the manager within the subunit prior to being submitted to the Accreditation and Coordination sub-unit, where they undergo another moderation process. Once accepted, reports are allocated to Accreditation Committee of Council (ACC) members to consider in order to ensure that the accreditation process is fair and that the decisions are consistent with the evidence found.

ACC members have access to the evidence provided by the independent school, as well as the source reports together with the consolidated accreditation report. Each ACC member is required to write a report on the institutions allocated to him/her, with recommendations as to whether to accept or amend the accreditation recommendation by the secretariat (the Evaluation and Accreditation unit), along with supporting reasons for their recommendation. Each member presents his/her findings on the allocated reports, and the committee makes a decision as to the final recommendation of the outcome of the schools' application for accreditation.

The ACC meets a minimum of four (4) times a year to discuss applications for accreditation. In the financial year under consideration, the ACC met six (6) times due to the high number of accreditation reports to consider.

The total of 243 reports were presented to the ACC during the 2019/20 financial year. Seventy-nine reports were presented in quarter one, followed by the increased number of 92 in quarter 2 two. The number however dropped from 42 in quarter three to 30 in quarter four. Though the target of 280 was not reached, this translates into a positive deviation as all the reports that were due for submission to the ACC in the current financial year were presented to the ACC. There is no backlog of reports to be presented to the ACC.

The turnaround time from the submission of the self-evaluation report to communication of the outcome to the institution after presentation of the accreditation report to the Accreditation Committee of Council can be up to 18 months. The following factors may delay the process:

- Schools being given provisional registration by the Provincial Education Department;
- The school's accreditation application not aligned to its offering;
- Disputes in the ownership of the school;
- Acquisition of new premises by the school and delays in securing registration certificates from the provincial education department;
- Sending the application back to the school for further information;
- Non-payment for the site visit;
- The school has not attended a QP workshop in preparation for the site visit;
- Examinations taking place;
- School holidays;
- Schools deferring site visits;
- Planning schools in remote areas to be visited at the same time;

In addition, a number of site visits planned for March 2019 had to be cancelled due to the COVID-19 situation.

However, the unit has made a great effort to shorten the turnaround time between site visit and presentation of the report to the ACC. Generally, a school can expect an outcome within 8 months of the site visit. The reports of the site visits conducted in Quarter four will be presented to the ACC in the new financial year.

- Some of the issues preventing schools from achieving accreditation are:
 - Some of the schools expand premises without acquiring permission and the necessary documentation from the provincial education department.
 - Health and safety certificates that have either expired or are not secured - especially for the new premises.
 - Teachers leaving schools for greener pastures once qualified and schools hiring unqualified teachers, or teachers who are not registered with SACE.

The number of accreditation reports presented to the ACC per quarter depends on the number of applications received, most importantly, on the number of site verification visits conducted.

Table 4: IS Reports submitted to the ACC

	Q1	Q2	Q3	Q4	Total
No. of consolidated accreditation reports submitted to the ACC (2019/2020)	79	92	42	30	243
No. of consolidated accreditation reports submitted to the ACC (2018/19)	40	80	41	93	254
No. of consolidated accreditation reports submitted to the ACC (2017/18)	42	60	57	39	198

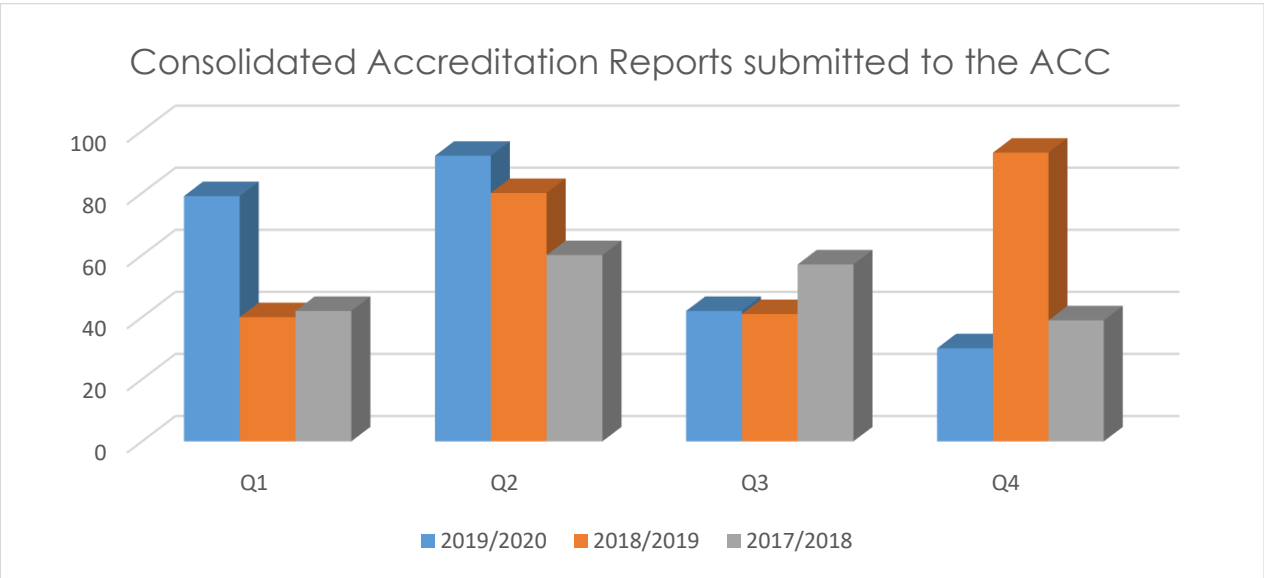


Figure 4: Consolidated accreditation reports submitted to the ACC

2.4.1 Areas of Strength

- (a) The quality and clarity of reports presented to ACC has improved.
- (b) The turnaround time between site visit and presentation of the report to the ACC has been reduced.

2.4.2 Areas of Concern

- (a) The reports of most of the schools that have been visited in the 2019/20 financial year indicate that the schools do not meet the accreditation criteria.
- (b) Some schools operate using names that are different to the registered name, or the name in which they school has applied for accreditation.

2.4.3 Recommendations for improvement

- (a) Schools must inform Umalusi of the change of name as approved by the provincial education department, and must only operate under the name approved by the provincial education department.

2.5 “Window Period”

Chapter 3 clause 25(2) of the GENFETQA Act states:

“If a private education institution fails to comply with the policy, the Council must

- (a) notify the private education institution in writing and set out the nature and extent of the failure; and
- (b) determine a reasonable period within which the private education institution must comply with the policy.

25(3) further states “At expiry of the period contemplated in subsection (2)(b), the Council –

- (a) “must evaluate the steps taken by the private education institution to comply with the policy and take into account any submissions made by the private education institution; and
- (b) “may affirm the accreditation of the private education institution or withdraw the accreditation as from a date specified by Council”.

In terms of this legislation, a “window period to improve” is offered to private education institutions that fail to meet the minimum standards for accreditation at the first presentation of the accreditation report to the ACC. Such private education institutions are granted an opportunity to improve on their submission to meet the requirements before the final accreditation decision is made. Institutions must maintain the minimum requirements for accreditation at all times.

Letters clearly indicating the areas where the institution did not meet the minimum requirements for accreditation and the time period in which the minimum requirements must be met are sent to the affected institutions. Institutions must submit evidence of their compliance with the relevant conditions and pay the required evaluation fee prior to the expiry of the “window period”. The submitted evidence is evaluated, and where

necessary, an unannounced follow up site visit is conducted to verify implementation of evidence submitted in respect of compliance with the conditions.

Areas identified as not meeting the minimum requirements for accreditation can range from one (1) to thirty (30) or more that the school needs to improve on.

The table and graph below show the number of 'Window Period' letters sent to schools after consideration by the ACC after the initial site visit. This could mean that most of the core criteria have not been met by a school. At the time of the "follow-up" site verification, all evidence for core criteria is verified over and above the items indicated on the feedback report that the school received. Should the institution not submit any evidence or pay the required fee during the prescribed period, a report indicating such is submitted, and the outcome of the school's application is then "no accreditation", based on the original consideration of the report by the ACC.

The window period time allocation is dependent on the level of risk identified. Under normal circumstances, the period is 6 months, but can range from 1 month to 12 months, depending on the areas to be improved. For instance, where learners are at risk, a short period is granted; and if the only area a school needs to improve on is the grade 12 results, then the window period must accommodate the next examination cycle. The number of "window period" letters issued has increased from 102 in the previous financial year to 199 in the current financial year.

Table 5: "Window Period" letters issued

	Q1	Q2	Q3	Q4	Total
No. of "window period" letters issued – 2019/2020	88	48	22	41	199
No. of "window period" letters issued – 2018/2019	43	18	41	0	102
No. of "window period" letters issued – 2017/2018	16	4	32	0	52

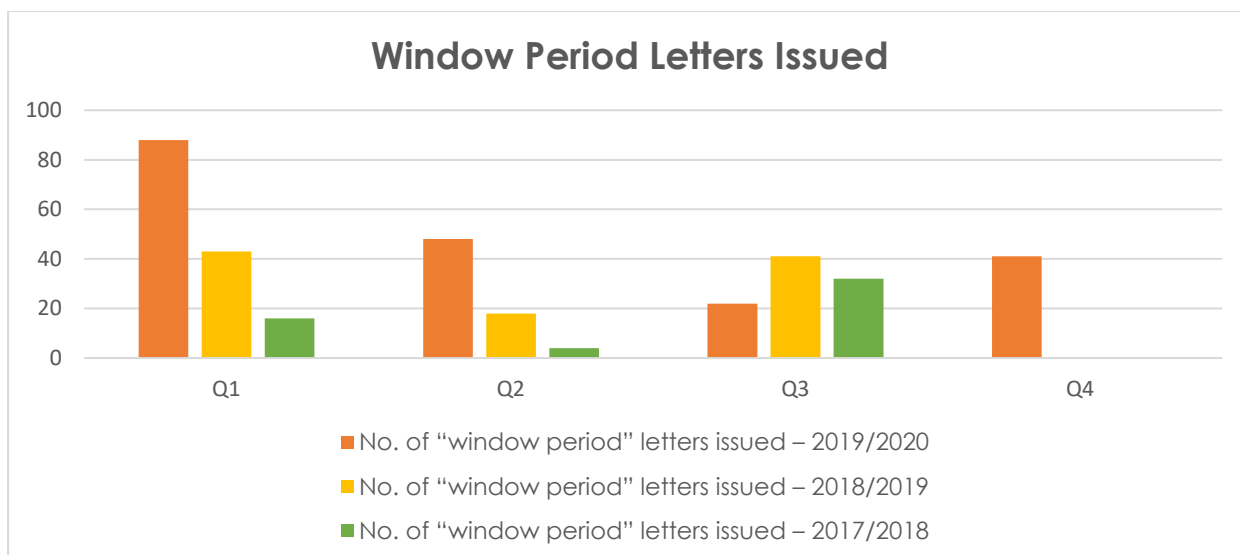


Figure 5: "Window Period" letters issued

2.6 Accreditation decision taken after the "window period" or provisional accreditation

A report on the extent to which the private education institution meets the accreditation criteria during a window period or provisional accreditation (the "improvement report") is considered by the Accreditation Committee of Council. The ACC considers the extent to which the institution meets the accreditation criteria at the time of the re-evaluation, and recommends the outcome of the institution's application for accreditation to the Chief Executive Officer of Umalusi for a final accreditation decision on behalf of Umalusi Council.

The private education institution may be granted an outcome of accreditation, provisional accreditation, or no accreditation, depending on the extent to which the institution meets the relevant criteria. A second "window period" or a "window period" after provisional accreditation may not be granted, therefore institutions which do not meet the minimum requirements for accreditation after a "window period" or provisional accreditation receive an outcome of "no accreditation".

The main reasons for schools not meeting the minimum requirements for accreditation are related to the following: schools operating outside of their registration with the provincial education departments, no current health and safety certificate, facilities at

the school being in poor condition, or the low number of SACE registered and professionally qualified teachers employed at the school.

2.7 Improvements following a “window period” or provisional accreditation

The evidence submitted by independent schools in response to the conditions to meet the requirements for accreditation has shown the extent to which independent schools embrace the opportunity. The timelines given are generally adhered to. Moreover, the unannounced follow-up site verification visits have confirmed that the evidence submitted is a true reflection of the improvement the schools have made.

The table below indicates the number of improvement reports (the reports on the evidence provided by an independent school following a “window period” or provisional accreditation) presented to the ACC and the accreditation outcomes following provisional accreditation or the “window period” to improve.

Table 6: Accreditation outcomes following a window period to improve

Financial year	No. of Improvement reports presented to the ACC following a “window period to improve”	No. granted accreditation following the window period	Number granted Provisional accreditation following the window period	No. granted “no accreditation” following the window period
2017-2018	76	48	5	23
	100%	63%	7%	30%
2018-2019	128	93	12	23
	100%	73%	9%	18%
2019-2020	56	27	8	21
	100%	48,2%	14,2%	37.5%

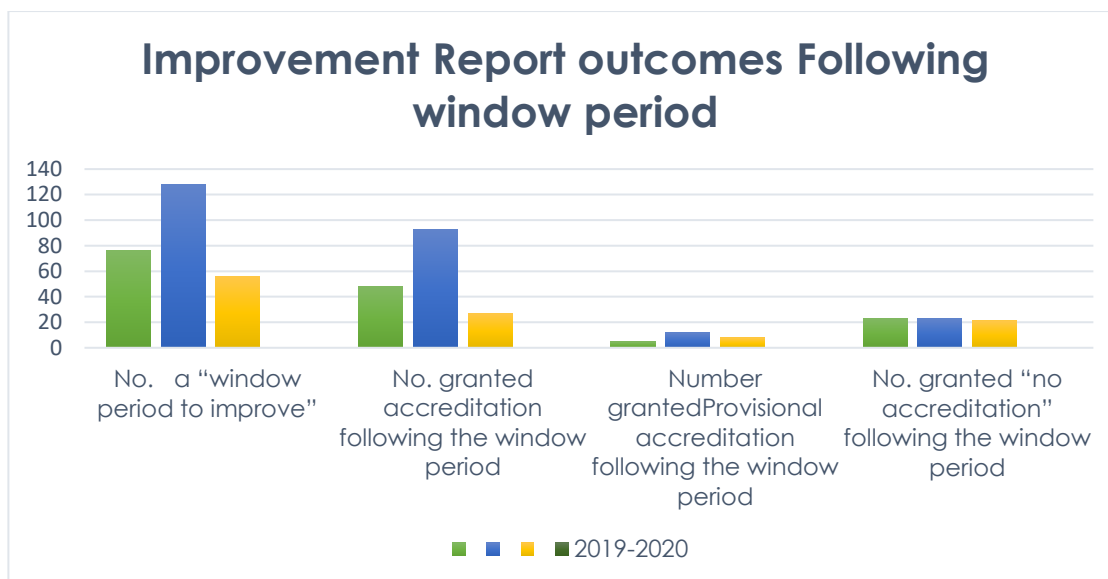


Figure 6: Accreditation outcomes following a "window period to improve"

The statistics above directly translate into an improvement in the conditions at schools, thereby improving the offering and environment experienced by learners and staff at those schools. There is always a good story to tell of the schools that have improved the conditions of both the learners and teachers at the schools. This includes the quality of teaching and learning as well as the safety of the premises.

Looking at the statistics in comparison to the past three years, it is evident that more schools are receiving a 'window period to improve' as a recommendation after the initial site visit is conducted. Once the improvement site visit takes place and the requirements per school is verified, very few schools are recommended 2 years provisional accreditation; the majority are granted accreditation. A school may be granted provisional accreditation due to the fact that the percentage of SACE registered and professionally qualified teachers has improved slightly and the school has achieved between 70% - 79% in this respect. Other reasons could be the non-alignment of the registration of independent school with the requirements of the provincial education department.

The school could be granted a recommendation of 'no accreditation' due to, amongst others, the school is not offering the CAPS; the Grade 12 results are below the national average; the school does not have a valid health and safety certificate; the EMIS registration certificate is not aligned to the offering of the school and the physical address from which the school operates; at least 80% of the teachers are not

professionally qualified and registered with the South African Council for Educators (SACE); the school does not demonstrate financial viability.

Most of the schools are recommended accreditation after the improvement report. The heads of institutions have confirmed through the feedback forms after the site visit that the accreditation process is developmental.

2.7.1 Areas of Strength

- (a) Feedback to the schools on areas that do not meet the minimum requirements for accreditation is taken seriously and addressed.
- (b) The schools make a concerted effort to employ SACE registered and professionally qualified teachers.
- (c) Most of the schools are granted either accreditation or 2 years provisional accreditation after a "window period" to improve.
- e) Academic Heads of schools implement the monitoring of quality teaching and learning more stringently.

2.7.2 Areas of Concern

- (a) Some of the schools wait until the last day of the expiry date to submit their evidence of improvement.
- (b) Some schools claim to have not received the feedback letters or are not aware of letters as the previous principal had left or the schools contact details have changed.
- (c) Some schools wait to be reminded to submit.
- (d) Some schools offering a foreign curriculum apply for accreditation with Umalusi even though they have been informed that Umalusi only accredits institutions offering qualifications registered on the GFETQSF.
- (e) The staff turnover rate of some schools is very high and the staff complement remains unstable.

- (f) Some schools are not financially sustainable as they rely on the Department subsidy to sustain the school financially.
- (g) An increased number of fraudulent SACE certificates are being submitted as part of the accreditation application.
- (h) Schools extend their facilities without consulting registered construction companies, which places the health and safety of learners at risk.
- (i) Schools operate without current valid health and safety certificates and or Acceptability as Food Premises certificates.

2.7.3 Recommendations for improvement

- (a) The importance of addressing the conditions and submitting on time must be addressed during the Quality Promotion Workshops.
- (b) More stringent measures to be put in place to verify the professional qualifications and SACE registration of teachers.
- (c) Umalusi to hold the Heads of institutions accountable for fraudulent SACE certificates submitted as part of the accreditation application.
- (d) Schools must be more diligent about adhering to registration requirements, as without the correct registration documentation, the school will not be accredited.
- (e) The payment for the improvement process needs to be taken more seriously by schools as they tend to delay payment once submission of evidence has been made.

2.8 Reapplication

Independent schools which fail to meet the accreditation criteria after being granted a period to improve on their submissions are granted a "no accreditation" status. A report highlighting the areas which were found not to meet the minimum requirements for accreditation is sent to the school.

The GENFETQA Act No. 58 of 2001 as amended in 2008 also requires Umalusi to report accreditation decisions to the relevant Provincial Head of Department. The schools are

therefore urged to re-apply for accreditation as soon as possible, as failing to do so may affect the registration status of a school. Schools use the revised accreditation instrument which is more user friendly and requires less documents to be submitted.

Thirteen (13) schools submitted a re-application for accreditation in the 2019/20 financial year.

2.8.1 Areas of Strength

- (a) The schools found the reviewed self-evaluation instrument for reapplication to be user-friendly.
- (b) The quality of evidence submitted by the schools in the reapplication process has improved.

2.8.2 Areas of Concern

- (a) Some of the schools wait for a long period before they re-apply for accreditation.
- (b) Schools continue to operate after they have been granted no accreditation.

2.8.3 Recommendations for improvement

- (a) The provincial education departments should follow processes to deregister schools that continue to operate after they have been granted no accreditation and have made no attempt to meet the requirements for accreditation by Umalusi.

2.9 Extension of scope

Independent schools which have already received an outcome of accreditation for one or more of the phases offered at the school may apply for "extension of scope" to offer a phase directly linked to a phase for which they are already accredited to offer. The extension of scope must fall within the parameters of the qualification for which accreditation has been granted. Four (4) schools have applied for extension of scope in the 2019/20 financial year.

The following process applies:

- a. An application for extension of scope must be submitted using the relevant instrument.

- b. The evidence for the criteria within the self-evaluation report pertaining to the extension of scope must be submitted.
- (b) The school is required to pay the fee pertaining to the evaluation of the application for extension of scope.
- (c) Schools which are successful in their application for extension of scope must return their original accreditation certificate to Umalusi and will be issued a new certificate indicating all the grades accredited to offer.

2.9.1 Areas of Strength

- (a) Similar to re-application, the schools found self-evaluation instrument for extension of scope to be user-friendly.
- (b) The quality of evidence submitted by the schools is good.

2.9.2 Areas of Concern

- (a) Some of the provincial education departments do not allow schools that are accredited to offer grades 1-9 to register as examination centres whilst awaiting finalisation of their application for extension of scope to offer grade 12.

2.9.3 Recommendations for improvement

- (a) Provincial education departments should consider applying for concessions for schools that are awaiting finalisation of their applications for extension of scope to offer grade 12

2.10 Monitoring

All accredited independent schools are subjected to monitoring at least every two (2) years to ensure maintenance and improvement of standards. Should an independent school be found to no longer meet the minimum requirements for accreditation, the accreditation status may be withdrawn after following due process. Monitoring may be differentiated, meaning that a school may be monitored in a different way to another accredited independent school and more often than another accredited independent

school, being informed by such factors as school results, or information received from the public or provincial departments of education.

The 2019/20 financial year has seen an increase in the number of schools that had to submit monitoring due to the increase of schools which were accredited in the 2017/18 financial year. There was a slight increase in the number of schools that were found to be non-compliant. This was predominantly due to expired Health and Safety Certificates and non-compliance with regard to the percentage of teachers who are professionally qualified and registered with SACE. It has also become more evident that some teachers have submitted fraudulent SACE registration documents as verified by SACE. Some schools appoint principals who are not professionally qualified and registered with SACE post accreditation.

Schools that were due for monitoring but had applied for extension of scope were monitored through the extension of scope process and were not included in the normal monitoring statistics

Table 7 below indicates the number of independent schools monitored between 01 April 2019 and 31 March 2020

Table 7 monitored independent schools

MONITORING OF IS	Q1	Q2	Q3	Q4	Total
Total number of schools to be monitored	33	45	40	79	197
Accredited schools monitored.	54	49	36	110	244
No. of reports submitted to the ACC.	23	89	34	31	192

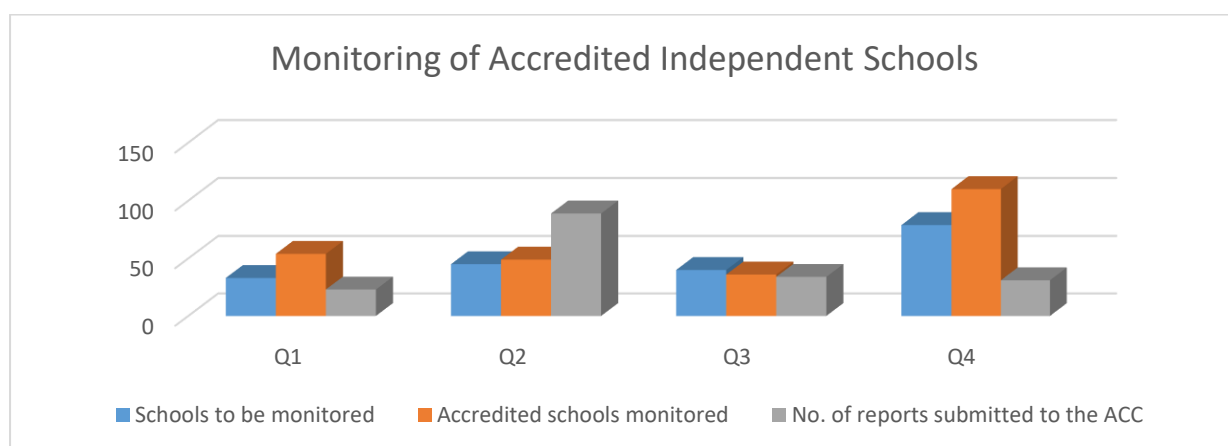


Figure 7 Monitoring of accredited independent schools

2.10.1 Areas of Strength

- a) Most of the schools continue to adhere to the Umalusi accreditation criteria.

2.10.2 Areas of Concern

- a) There is an increase in the number of fraudulent SACE registration documents in circulation.
- b) Expired health and safety certificates.
- c) Schools employ teachers that are unqualified and not SACE registered.
- d) Most schools appoint unqualified principals that are not SACE registered.

2.10.3 Recommendations for improvement

- a) Principals at schools must be more vigilant and verify the authenticity of the qualifications and SACE registration documents submitted by teachers.

2.11 Monitoring Underperforming Accredited Schools

One of the accreditation criteria that accredited independent schools must continue to meet is that their grade 12 results continue to be on par with or above the national average. Underperforming schools are therefore required to submit improvement reports as part of monitoring. The 2019/20 financial year saw an increase in the number of underperforming accredited schools in the 2018 NSC Examinations from four to eight. These schools had to develop an improvement plan and indicate how they would improve their results in the 2019 NSC examinations. They subsequently submitted improvement reports and their results for the 2019 NSC were monitored. From the eight underperforming schools, five (5) managed to improve their results and performed above the national average. Reports on their performance were presented to the ACC.

2.12 Review and appeal of accreditation decisions

The review and appeal processes are internal processes of validating an accreditation decision, which are addressed as follows:

- a) A query or appeal is received from the independent school.
- b) The query or appeal is recorded in the appeals register.

- c) The letter containing the query or appeal is brought to the attention of the manager dealing with accreditation of independent schools to investigate the matter.
- d) The query or appeal and findings are presented to the Internal Accreditation Committee (IAC).
- e) The query or appeal and findings together with the recommendation of the IAC are presented to the Accreditation Committee of Council (ACC).
- f) The ACC considers the findings and the recommendations of the IAC and then either:
 - i. reviews the original recommendation, or
 - ii. stands by their original decision, and advises that the matter be referred to the Accreditation Appeals Committee (AAC) should the school still wish to pursue the appeal.
- g) The independent school is advised of the decision of the AAC and invited to lodge a formal appeal to be heard by the AAC. An invoice is raised for the independent school to pay an appeal fee, which is determined on an annual basis by Umalusi Council.
- h) If payment is made within the stipulated time period, the appeal is presented to the Accreditation Appeals Committee.
- i) The Chair of the AAC presents recommendations of the Accreditation Appeals Committee to the Umalusi EXCO for a decision.
- j) The outcome is communicated to the independent school.

2.13 Stakeholder Relations

2.13.1 Quality Promotion Meetings

Quality Promotion meetings are meetings that are conducted with schools to explain accreditation criteria and provide guidelines for the self-evaluation and site verification processes prior to submission of the application for accreditation (that is, the self-evaluation report). Following the decrease in the number of schools that apply for accreditation, Umalusi has slightly reviewed the approach to accommodate schools as and when they apply for accreditation. These meetings continue to be conducted in provinces across the country in line with the letters of intent to apply for accreditation

submitted. Attendance of a Quality Promotion meeting is a compulsory step in the accreditation process, prior to a school gaining access to the self-evaluation report. The table below indicates the spread of Quality Promotion meetings conducted over the 2019/20 financial year.

Table 8: Quality Promotion Meetings held between 01 April 2019 and 31 March 2020

	Q1	Q2	Q3	Q4	Total
Eastern Cape	3			1	4
Free State		2			2
Gauteng	4	4	2	5	15
KwaZulu Natal	2			2	4
Limpopo	1			2	3
Mpumalanga	1	1		1	3
Northern Cape					0
North West	3	1		1	5
Western Cape				2	2
Total no. of Quality Promotion Meetings held	14	8	2	14	38

2.13.1.1 Areas of Strength

- (a) Quality Promotion Meetings are conducted throughout the year as and when the need arises in line with applications received from the schools.
- (b) Schools understand the accreditation process and have a clear understanding of Umalusi's expectations following the meetings.
- (c) It is compulsory for principals to attend the QP workshops.

2.13.1.2 Areas of Concern

- (a) Some of the schools do not attend Quality Promotion Meetings and therefore remain at the LOI stage as the system will not allow them to submit the self-evaluation report if they have not attended a Quality Promotion Meeting.

2.13.1.3 Recommendations for improvement

- (a) Schools that do not attend Quality Promotion Meetings must be removed from the system in line with the approved guidelines.

2.14.1 Other Meetings with Stakeholders

The Independent Schools sub-unit engages in various activities to establish and maintain stakeholder relations, such as:

- Meetings with the Provincial Education Departments and the Department of Basic Education to discuss matters of common interest.
- Meetings to issue out accreditation certificates.
- The accreditation forum.
- Any other meeting or seminar that may be initiated by the sub-unit and approved by the Senior Manager.

Table 8: Formal Meetings held with stakeholders between 01 April 2019 and 31 March 2020

Stakeholder Meetings	Q1	Q2	Q3	Q4	Total
Provincial Departments of Education	01	01	01	01	04
Accreditation Forum				03	03

2.15.1 Feedback from schools with regard to the accreditation process

2.15.1.1 Verbatim positive feedback from most of the schools includes the following:

<i>The process was smooth, organised and professionally done.</i>
<i>The site verification instruments were helpful and acted as a useful "checklist" before the site visit took place. It was particularly useful in helping to get the campus "ship shape" and Health and Safety issues properly attended to. These documents should be useful to any school looking to self-improvement.</i>
<i>The group interviews were professionally conducted. This interview was conducted in a friendly, polite and amicable manner</i>

The team was on time and engaged with us all the way through the process.

We were so thankful to have this experienced, knowledgeable, professional, and gracious team helping us through the process so we can grow as a school and become better in all areas.

The interviews were thorough yet not intimidating. We all felt the team members were not looking to find fault but rather identify areas of weakness so we can improve as a staff and school.

2.15.1.2 Verbatim recommendations for improvement include the following:

We would have liked to have seen more diversity in the evaluation team that visited.

In our view the team should have been at least 10 evaluators in size to properly and thoroughly evaluate the evidence compiled from the 5 criterion.

In our view 5 hours is not enough time to do justice to the volume of evidence requested.

We believe that more time should be given to planning the site visit very carefully. At least a 2 day visit would be fairer to both the evaluators and the school.

2.16 Other activities

2.16.1 Training

The Evaluation and Accreditation unit plan to train the ad hoc contracted staff of both the Independent Schools and Post School Qualifications sub-units on desktop and site visit processes. The purpose of the training will be to streamline the verification process across the sub-units. Contracted staff from across the country will invited to attend the training. Training will be conducted in three (3) provinces, namely, Gauteng, Kwa-Zulu Natal and Western Cape.

Currently there are 226 contract staff appointed in the roles of ad hoc evaluators, subject specialists and accreditation report writers in the independent schools' sub-unit. The table below shows the number of contracted staff per province.

Table 9: Independent Schools' Independent Contract Workers

Province	No. of Independent Schools
Eastern Cape	4
Free State	2
Gauteng	131
KwaZulu-Natal	41
Limpopo	8
Mpumalanga	7
Northern Cape	4
North West	8
Western Cape	21
Total	226

2.16.2 Home Education Policy and Regulations

The sub-unit has been part of the committee reviewing the 1999 policy and developing the regulations on Home Education. One of the key issues discussed was the trend of institutions which operate illegally as schools and bypass registration by the provincial education departments and accreditation by Umalusi.

During 1999, the then Department of Education (DOE) promulgated a Policy for the registration of learners in Home Education; however, the Policy could not be implemented effectively due to gaps and inconsistencies. The policy was therefore reviewed and the areas of concern strengthened after consultation meetings with stakeholders. The *Policy on Home Education* was promulgated in November 2018, and is in its early stages of implementation.

On 28 February 2020, the Minister of Basic Education, the Honourable Mrs AM Motshekga, hosted a Home Education Roundtable Discussion under the theme "Home Education in the best interest of the learner". One of the key objectives of the Roundtable was to strengthen collaboration amongst parents, departments, institutions, independent curriculum providers and other role players in home education.

2.16.3 HEDCOM Sub-committee on Independent Schools

In November 2015, the CEO of Umalusi requested the Director General of Basic Education for the formation of a HEDCOM Sub-committee on Independent Schools to ensure uniform policy implementation of registration of independent schools. The sub-unit participates in the sub-committee and has been involved in the discussion of issues related to registration and accreditation of independent schools.

2.16.4 Advocacy

The Independent Schools' Newsletter, *Heartbeat* is available on Umalusi's website.

A "teleillustration" as well as an infographic explaining the accreditation process have been developed in conjunction with Umalusi's Public Relations and Communications unit. These materials have been widely distributed in an effort to advance the understanding of the accreditation process.

2.16.5 Reporting to the Provincial Education Departments

The status of independent schools is reported to Provincial Education Departments annually, and more frequently on request. The status is reported in terms of "green" "amber" and "red" status. This facilitates identification of the schools which have met the requirements/made considerable progress towards meeting the requirements in terms of Regulation 26A.

A "green" status indicates that an independent school is compliant with Umalusi's requirements for that particular year. A "red" status indicates that either the independent school has not made sufficient progress in their application to be considered compliant with Umalusi's requirements, or the independent school has been through the accreditation process and found not to meet the minimum requirements for accreditation. Umalusi considers applications for concessions of the schools that are "red" from assessment bodies. Such schools must have made considerable progress in their application for accreditation by 31 August of a particular year to be able to register as examination centres for the following year.

The category of “amber” status indicate that the independent school is in the Umalusi accreditation process and has not yet met the prescribed minimum standards for accreditation. Such a school has been granted a “window period” to improve on their submission. The assessment body can use their discretion as to whether or not to register such a school as an examination centre for that particular year. Umalusi will issue certificates to learners writing at such centres who meet the requirements of the NSC.

The table below reflects the status of registered independent schools in South Africa, including primary schools and schools offering a qualification other than the National Senior Certificate. The number of schools with a red status remains high due to the schools that are not offering CAPS and primary schools that are reluctant to apply for accreditation.

Table 10: 2020 Accreditation status across nine (9) provinces

Province	Green	Amber	Red	Total
Eastern Cape	82	36	100	218
Free State	28	06	35	69
Gauteng	417	74	662	1153
KwaZulu Natal	144	31	94	269
Limpopo	86	19	55	160
Mpumalanga	52	18	62	132
North West	55	07	25	87
Northern Cape	18	01	17	36
Western Cape	115	17	133	265
TOTAL	997	209	1183	2389

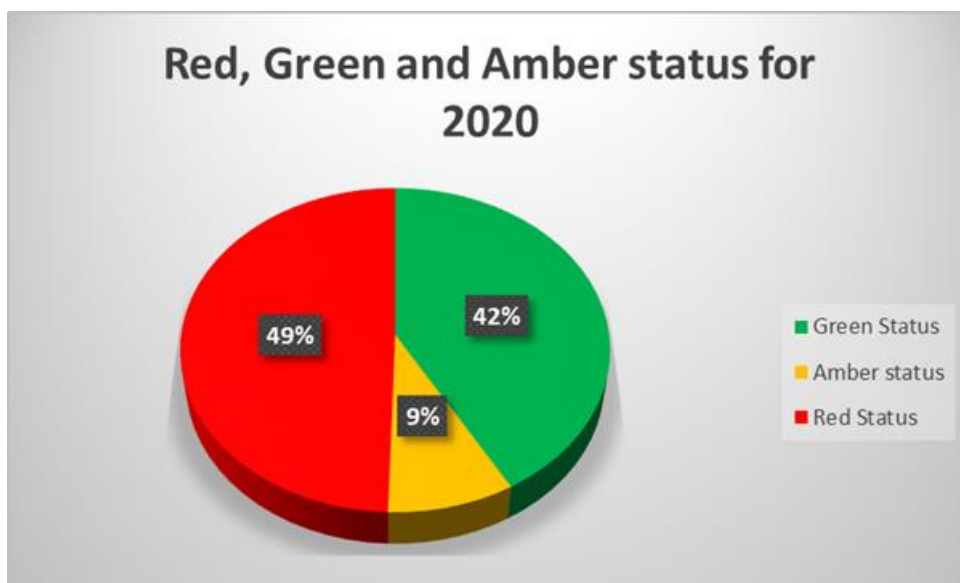


Figure 8 Accreditation status

2.16.5.1 Areas of Strength

Schools are taking the “red, green and amber” list seriously and have applied for accreditation, especially where it involves certification of grade 12 learners at the end of the year.

2.16.5.2 Areas of Concern

- (a) Not all assessment bodies fully understand the process of accreditation.
- (b) The lack of understanding of the difference between accreditation and registration.
- (c) The lack of understanding that the assessment bodies are responsible for registration of examination centres and NOT Umalusi.
- (d) The low number of Independent primary schools that apply for accreditation.

2.16.5.3 Recommendations for improvement

- (a) More awareness campaigns to the public about the legal requirements of independent schools to be accredited.
- (b) Provincial education departments becoming stricter in the enforcement of accreditation compliance, especially with primary schools.

CONCLUSION

Section 3 of the National Qualifications Act (NQF) No. 67 of 2008 states that every qualification or part-qualification offered in South Africa must be registered on the National Qualifications Framework. All independent schools that offer a qualification that is registered on the GFETQSF are required by law to apply for accreditation with Umalusi. It is in that light that the sub-unit is inundated with applications for accreditation.

The sub-unit strives to ensure quality provision of the qualification registered on the GFETQSF, the National Senior Certificate. The sub-unit prides itself in the 629 schools that have been granted accreditation and 273 schools that have been granted provisional accreditation in the period 2013 to March 2020.

Annexure A: Evaluation and Accreditation IS sub-unit
Organogram

