Makoya

March 2022

The Accreditation Status of Registered Independent Schools in South Africa

How to Verify that a **Private Education Institution is Accredited** by Umalusi

Training for Independent Contract Workers

1918

JMB
Joint Matriculation Board

1996

SAFCERT
South African Certification Council

2002

UMALUSI
The UMALUSI era

#2Decadesof Education Guardianship

#MakoyaQualifications

2022

20th Anniversary

Two Decades of Education Guardianship
2002 – 2022

UMALUSI

Quality Council for General and Further Education and Training

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From the
Editor's Pen

Dr Lucky Ditaunyane

Welcome to the first issue of *Makoya* for 2022. This year, Umalusi will be celebrating its 20th anniversary under the theme: *"Two decades of education guardianship: 2002–2022"*. This is a significant moment in a relatively short history of Umalusi's existence. However, the organisation has come a long way and it has grown substantially in the past 20 years. It has also reached numerous milestones that are too many to mention in this publication. Therefore, Umalusi will be embarking on a series of activities to celebrate this momentous occasion in its history.

Umalusi, the quality council for general and further education and training, has continued to implement its programmes under the different lockdown regulations of the COVID-19 pandemic. It has not been easy, but Umalusi staff members have found innovative ways to still fulfil the organisation's mandate by, among other things, using online platforms to hold meetings and conduct workshops and webinars.

One of the silver linings of the COVID-19 pandemic has been the use of technology for efficiency. Some of the new habits will carry on beyond the pandemic because of their apparent benefits, such as cost efficiency and the effective use of resources. For this publication, we bring you stories that cover the work of the Evaluation and Accreditation Unit, which fulfils a critical aspect of Umalusi's broader mandate, which is the evaluation and accreditation of independent institutions (independent schools, private colleges and adult learning centres), as well as independent assessment bodies.

As always, Makoya contains vital information about the work of Umalusi. Over the years, Umalusi has positioned itself as a key stakeholder in education. It is constantly looking for opportunities to communicate significant, strategic messages about the mandate and work of the organisation to its external stakeholders. Makoya – Umalusi's official newsletter – is one of the platforms that it uses to achieve this goal. Enjoy!

From the CEO's Desk

Dr Mafu Rakometsi

I am delighted to write this introductory piece for our official newsletter, Makoya, which covers some of the work of Umalusi, the Quality Council for General and Further Education and Training. This is a special year for Umalusi because the organisation will be celebrating 20 years of its existence. Umalusi's growth has been a slow, but steady process, punctuated by critical moments that determined the trajectory the organisation would take.

The entity was established through the promulgation of the General and Further Education and Training Quality Assurance (GENFETQA) Act, Act No. 58 of 2001, as amended in 2008. The path to the establishment of Umalusi was paved by two of its predecessors: the Joint Matriculation Board (JMB), established in 1918, and the South African Certification Council (SAFCERT), established in 1986. Umalusi started its work in 2002 after taking over from SAFCERT.

The name Umalusi is a Nguni word that means "shepherd" or "herder", and, in the African context, "guardian of family assets". The organisation was initially established as an education and training quality assurance body (ETQA) under the GENFETQA Act. According to this Act, Umalusi is mandated, among others, to do the following:

a. Monitor the suitability and adequacy of standards and qualifications.

b. Assure the quality of learner assessment at exit points.

c. Accredit private providers and private assessment bodies.

d. Certify learner attainments for qualifications that fall under its remit.

e. Promote quality improvement among providers.

In 2008, the National Qualifications Framework (NQF) Act established Umalusi as a quality council, together with two other quality councils: the Council on Higher Education (CHE) and Quality Council for Trades and Occupations (QCTO), as well as the South African Qualifications Authority (SAQA). In relation to the work of Umalusi, the NQF Act makes provision for the following:

a. Develop and manage its sub-framework and make recommendations thereon to the relevant Minister.

b. Advise the relevant Minister on matters relating to its sub-framework.

For this publication, the focus will be on the work of the Evaluation and Accreditation Unit. By accrediting private education institutions, Umalusi ensures that section 29(3)(c) of the South African Constitution is upheld: that independent educational institutions should "maintain standards that are not inferior to standards at comparable public educational institutions".

THE ACCREDITATION STATUS OF REGISTERED INDEPENDENT SCHOOLS IN SOUTH AFRICA

By Klaus Lettau

The General and further Education and Training Quality Assurance (GENFETQA) Act, 2001 (as amended in 2008), states that any institution that is required to register as an independent school in terms of the South African Schools Act, 1996, must comply with the policy and criteria developed by the Umalusi Council for the quality assurance of private education institutions. The Policy and Criteria for the Quality Assurance, Accreditation and Monitoring of Independent Schools and Private Assessment Bodies (Government Gazette 35830 of 29 October 2012, as amended in 2017), and the accompanying Regulations (Government Gazette 41206 of 27 September 2017) outline the criteria, process and requirements for accreditation.

Umalusi accredits independent schools to offer the National Curriculum Statement (NCS), which leads to the National Senior Certificate (NSC). This is currently the only "school" qualification that is registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF).

The January 2022 School Realities report indicates that, in 2021, there were 2 1541 registered independent schools across the nine provinces. It must be noted that a school that is not registered by the provincial education department is operating outside of legislation. An application for accreditation by Umalusi will only be considered for a school that is registered by the provincial education department.

Table 1 indicates the stage in the accreditation process of the 2 154 registered independent schools across South Africa as at 31 August 2021.

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1   2022 School Realities: https://www.education.gov.za/Portals/0/Documents/Reports/School%20Realities%202021.pdf

Table 1

Stage of the accreditation process	Number of schools	Percentage
Accredited	674	31%
Outcome of no accreditation	93	4%
Not started with the accreditation process	595	28%
Two years provisional accreditation	125	6%
Submitted an intent to apply for accreditation	285	13%
Submitted the self-evaluation report	258	12%
Granted a "window period" to improve on its submission	124	6%
Total	**2 154**	**100%**

Of the 2 154 registered independent schools, 595 had not started the Umalusi accreditation process as at 31 August 2021. Reasons for this could be because the schools offer a curriculum that is not registered on the National Qualifications Framework, or are primary schools who are ignoring the legal requirement to be accredited as they do not consider it to be necessary since they do not offer a Grade 12 qualification. Primary schools are urged to comply with legislation and seek accreditation by Umalusi.

Umalusi has accredited 31% of the registered independent schools (674) to offer the NCS (which includes the Curriculum and Assessment Policy Statements – CAPS), which leads to the NSC.

Some 93 schools have been through the accreditation process, have received an outcome of no accreditation as they did not meet the requirements for accreditation after being given an opportunity to improve, and have not re-applied for accreditation. As at 31 August 2021, an additional 124 schools had not met the requirements for accreditation and had been granted a window period to improve on their submission prior to the Council making a final decision on the outcome of the school's

application for accreditation.

The 125 schools with an outcome of two years' provisional accreditation had met the majority of, but not all, the minimum requirements for accreditation and were given a period of two years in which to meet the minimum requirements.

The main reason for schools not meeting the minimum requirements for accreditation is that they do not have sufficient teachers with professional teaching qualifications and current registration with the South African Council for Educators (SACE).

On the same date, 258 schools were at the stage of having submitted their self-evaluation report. The next step in the process for those schools is to undergo a site visit to verify the implementation of evidence submitted in the self-evaluation report.

An additional 285 schools had submitted their intent to apply for accreditation, but had not progressed past the stage of notifying Umalusi of their intent to apply for accreditation. Submission of an intent to apply for accreditation is not considered as being compliant with Umalusi's accreditation processes.

These statistics highlight the importance of parents checking the accreditation status of an independent school prior to enrolling their child at the school. Accredited schools are issued with letters clearly indicating the name and physical address of the accredited institution, the grades that the school is accredited to offer, and the qualification they are accredited to offer. Accreditation certificates are issued to accredited independent schools in March of the year following accreditation.

Accredited and provisionally accredited independent schools are indicated on the Umalusi website on the following link: https://www.umalusi-online.org.za/enquiries

Queries can be directed to:
accreditation@umalusi.org.za

THE PROJECT OF RECALLING AND RE-ISSUING ACCREDITATION CERTIFICATES FOR INDEPENDENT SCHOOLS

By Dr Nokuphiwa Mkhabela

Introduction and background

Accreditation for an indefinite period is granted to independent schools that fully meet the requirements for accreditation. Post-accreditation monitoring is in place to verify that accredited independent schools continue to uphold the minimum requirements for accreditation. Initially, the accreditation certificates for independent schools only reflected the starting date of the school's accreditation, with no expiry date. This inadvertently led to a situation where accreditation could be withdrawn from a school, but the school could still use copies of the original accreditation certificate to claim that it was accredited by Umalusi. Umalusi therefore took a decision to include an expiry date on the accreditation certificates of all independent schools.

The certificates of accredited schools that continue to maintain the minimum requirements for accreditation, as determined through the monitoring process, and pay the required biennial accreditation fee, are renewed upon expiry. The certificates of schools that have not maintained the minimum requirements for accreditation or that failed to pay the required biennial accreditation fee are not renewed upon expiry.

Independent schools that were accredited between 2013 and 31 March 2019 and that had accreditation certificates without an expiry date were requested to return the accreditation certificates by 31 May 2021. A total of 488 certificates without an expiry date were recalled. New certificates with an expiry date were sent to the independent schools via courier upon receipt of the certificates without an expiry date.

Follow-up was made with the schools that had not submitted their certificates without an expiry date by 31 May 2021. The schools were given a second opportunity to submit their certificates by 30 November 2021. Umalusi concluded the process of reissuing certificates with an expiry date to accredited independent schools by the end of November 2021. As a result, all accredited independent schools should have accreditation certificates indicating the start of their accreditation period and the expiry date of the accreditation.

Independent schools that did not return their original certificate will no longer be able to use the original certificate without an expiry date. The public should be aware that accreditation certificates are valid for the period indicated on the certificate, and that certificates without an expiry date are invalid. Therefore, the principal of a school must ensure that the school has a valid accreditation certificate.

Challenges experienced with the recall and re-issue of accreditation certificates

Most schools responded positively to the clarion call to return certificates without an expiry date. However, a number of challenges emerged with this process, such as the following:

a. Some schools submitted copies of the certificate, while it was requested that the original certificates be returned to Umalusi.

b. Some principals did not want to return their certificates because they said parents needed to see the certificates when they were applying for admission of their children to the school.

c. Some did not submit their certificates on the basis that Umalusi had not consulted stakeholders about the recall of certificates without an expiry date. This was despite Umalusi discussing the matter at accreditation forums over two consecutive years prior to implementing the decision.

d. Some schools returned the monitoring outcome letter instead of the accreditation certificate.

e. Many schools that were accredited after 31 March 2019 and were not required to return their certificates since the certificates were issued with an expiry date heard from other sources about the recall of certificates and decided to return their certificates as well. Those certificates were couriered back to the schools.

f. Some schools with two years' provisional accreditation misinterpreted the information and were under the impression that they also qualified to receive the certificates.

g. The schools that preferred to hand deliver their certificates to Umalusi were informed that they should make an appointment online to limit the large number of walk-in clients in the building in line with the COVID-19 regulations. However, some schools arrived at Umalusi without making an appointment and demanded that the security staff should call Umalusi staff to assist them.

h. Some of the schools indicated that they had lost their certificates. They were requested to provide affidavits in that regard.

i. Many schools indicated a change of information such as the change of principal, email address, physical address and name of the school. The change of information requires verification. For example, the change of principal requires verification of the principal's professional teaching qualifications and current registration with the South African Council for Educators. The change of name or physical address of a school requires further engagement with the school to provide evidence of the change being authorised by the provincial education department.

Conclusion

The project of recalling and re-issuing accreditation certificates for independent schools was challenging, but Umalusi staff managed to ensure its success. Some 391 new certificates with an expiry date were couriered to the schools by the end of January 2022. Some 97 independent schools did not return their certificates without an expiry date. As a result, their new certificates with an expiry date were not couriered to them. Independent schools that did not submit their original certificates without an expiry date are required to make arrangements with Umalusi regarding the re-issue of their certificates.

Certificates without an expiry date are now invalid. Independent schools that did not return their original certificates may no longer display the accreditation certificate without an expiry date. Accreditation certificates are valid for the period indicated on the certificate. Umalusi accreditation certificates that do not bear an expiry date are no longer valid and cannot be used to attest to the accreditation status of a school. The onus is on the school to ensure that it has a valid accreditation certificate.

The decision to replace the accreditation certificates with those with an expiry date will ensure that the public will be able to distinguish between schools that provide quality education and those that have failed to maintain the required standards for accreditation. Umalusi expresses gratitude to the schools that cooperated with the decision of recalling and re-issuing accreditation certificates despite the challenges imposed by COVID-19.

HOW TO VERIFY THAT A PRIVATE EDUCATION INSTITUTION IS ACCREDITED BY UMALUSI
By Thomas Magadze

Background and introduction

It is advisable for parents, when choosing an independent school or private college for their children, to first check whether the independent school or private college is registered with the relevant department of education and accredited by Umalusi.

Umalusi accredits independent schools to offer the National Curriculum Statement (NCS) in Grade 1 to 12. This leads to the National Senior Certificate. All independent schools offering the NCS (commonly referred to as the Curriculum and Assessment Policy Statement or CAPS) are required to be registered with the provincial education department and accredited by Umalusi.

Private colleges offering the NATED Report 190/191 Engineering Studies N1-N3, National Certificate (Vocational) Levels 2–4 and General Education and Training Certificate: Adult Basic Education and Training (GETC: ABET) are

required to be registered with the Department of Higher Education and Training (DHET) and accredited by Umalusi to offer the specific qualification.

Registration and accreditation

There is a difference between the registration and the accreditation of private education institutions. The South African Schools Act No. 84 of 1996, as amended, specifies that an independent school must be registered by the (provincial) Head of Department before it can be established or maintained1. Similarly, the Continuing Education and Training Act No. 16 of 2006, as amended, indicates that no person other than a public college or an organ of state may provide continuing education and training (that is learning and training programmes leading to qualifications or part-qualifications at Level 1 to 4 of the National Qualifications Framework provided for at a college) unless that person is registered or provisionally registered as a private college in terms of the Act2.

To this effect, all private education institutions must be registered with the relevant department and be accredited by Umalusi. Registration is, in effect, "a license to operate".

Accreditation, on the other hand, attests to the capacity of an institution to offer a qualification registered on the General and Further Education and Training Qualifications Sub-framework (GFETQSF) at the required standard.

Registration by the relevant department of education and accreditation by Umalusi are therefore two separate processes with which private education institutions offering qualifications registered on the GFETQSF must comply.

South Africa has seen an increase in bogus colleges and schools that claim to be registered with the DHET or provincial education departments. The term "bogus college/school" refers to private education institutions that are operating illegally in this country. They pose a threat to the offering of quality education since they are not registered and accredited. Umalusi does not issue certificates to candidates writing their examinations at private education institutions that are operating illegally.

Sources of verifying accredited private education institutions

Accredited private education institutions may be verified through accreditation letters, accreditation certificates and on the Umalusi website as follows:

a.   Valid accreditation certificates

Private education institutions receive a letter indicating the outcome of their application for accreditation. Private colleges that are accredited for a period of seven years, and accredited independent schools, are provided with accreditation certificates. A valid certificate of Umalusi accreditation indicates the name of the institution, the physical address, the grades, subjects or programmes the institution is accredited to offer, the accreditation period, accreditation number and date of issue of the certificate. If the expiry date and date of issue are not indicated, the implication is that the certificate is no longer valid, and the accreditation status of the institution is questionable.

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1   Section 46(1) of the South African Schools Act
2   Section 28 of the Continuing Education and Training Act

b. Umalusi website

Accredited private education institutions may be verified on the Umalusi website, www.umalusi.org.za, by clicking on the link: "Accredited institutions" (https://www.umalusi-online.org.za/enquiries). Type in the "institution name," choose the province, select the provider type (FET, school or AET), and finally select the status. Click the "view" icon to see the information pertaining to the institution you have chosen.

The Umalusi website indicates two types of accreditation status: accreditation and provisional accreditation. Private education institutions that do not meet the minimum requirements for accreditation for the first time are granted a "window period to improve" and are given a reasonable time to improve. However, a window period to improve is not an accreditation status and is not indicated on the website.

Implication of the "no accreditation" outcome

Umalusi informs all private education institutions of the outcome of their application for accreditation. In addition, Umalusi informs the provincial heads of department and Registrar of Private Colleges of the outcome of the application for accreditation of institutions in their respective sectors. Private education institutions that fail to meet the minimum requirements for accreditation after two years' provisional accreditation or a window period to improve receive a final outcome of "no accreditation". Independent schools and private colleges granted "no accreditation" are advised to re-apply for accreditation or face the risk of deregistration by the provincial education department or the Department of Higher Education and Training.

Conclusion

Information about whether a private education institution is accredited can be verified through the Umalusi website, the letter indicating the outcome of the application for accreditation and/or the accreditation certificate. It must be noted that an accreditation certificate without an expiry date is no longer valid.

To prevent becoming a victim of a fraudulent college or school, it is critical to verify the registration and accreditation status of a private education institution prior to enrolling in the institution.

THE ACCREDITATION APPEAL PROCESSES

By Dr Gugulethu Nkambule

Background and introduction

Umalusi recognises the right to an appeal by a private education institution if it considers the outcome of the accreditation decision to be unsatisfactory or unjust. Institutions that are granted an outcome of "no accreditation" have the right to appeal the decision of the Accreditation Committee of Council (ACC) in line with the provisions of the Promotion of Administrative Justice Act (Act No. 3 of 2000, as amended). An appeal must be lodged within ten working days of the date of emailing the outcome letter. Umalusi does not consider

appeals lodged after the expiry of the 10 working days. The basis for an appeal must be that the institution believes, and has evidence to support their claim, that an incorrect decision was made, taking into account evidence that was available at the time of the decision. Measures put in place after the evaluation do not constitute grounds for an appeal.

The details on how to submit an appeal are included in the letter advising institutions of the "no accreditation" outcome. The institution is required to complete and submit the requisite appeal form, together with supporting

evidence. Upon receipt of the completed appeal form, together with the supporting documents, the appeal is first presented to the next meeting of the ACC. The ACC may review or stand by its original decision. If the ACC stands by its decision, the institution is advised that the matter will be referred to the Accreditation Appeals Committee (AAC) if it wishes to take the appeal further. The appeal outcome letter is communicated to an institution together with a pro-forma invoice for the cost of the appeal, which is payable within 15 working days of sending the invoice. The institution is required to pay the invoice within the indicated time period in order to lodge a formal appeal to be considered by the AAC. If the invoice is paid within the prescribed period, the appeal is submitted to the next sitting of the AAC for consideration.

Accreditation Appeals Committee

The Accreditation Appeals Committee is a committee established by the Umalusi Council to deal specifically with accreditation appeals emanating from the outcome of the Umalusi accreditation processes. The AAC consists of legal experts and professional persons, qualified and experienced in accreditation matters. The purpose of the AAC is to ensure that private education institutions have an opportunity to appeal against an accreditation decision or outcome that is felt to be unjust.

The AAC considers the completed appeal form and supporting documents, the reason for the no accreditation outcome, as well as recommendations from the Manager: Internal Accreditation Committee (IAC) and the ACC. The AAC may recommend that the decision of "no accreditation" be rescinded or upheld. Recommendations of the AAC are presented to the Umalusi Executive Committee of Council (EXCO) for a decision and ratification. Thereafter, a final appeal outcome is communicated to the institution. If the outcome of "no accreditation" is upheld, the institution is advised to reapply for accreditation. Should the finding be in favour of the appellant, the fee is refunded. In such cases, the "no accreditation" outcome is set aside and the evidence submitted is subsequently evaluated. A new report is then submitted to the ACC for a recommendation on the outcome of the application for accreditation.

Appeals presented to the Accreditation Appeals Committee

The number of appeals presented to the AAC over the past three financial years is as follows:

Table 1: Appeals presented in 2019/20, 2020/21 and 2021/22

Year	Number of appeals submitted to the Accreditation Appeals Committee		Number of appeals succeeded	Percentage of appeals succeeded
2019/20	FET[1] private colleges	6	0	0%
	Independent schools	8	3	37.5%
2020/21	FET private colleges	0	0	0%
	Independent schools	5	0	0%
2021/22	FET private colleges	2	1	50%
	Independent schools	4	0	0%
Total		**25**	**4**	**16%**

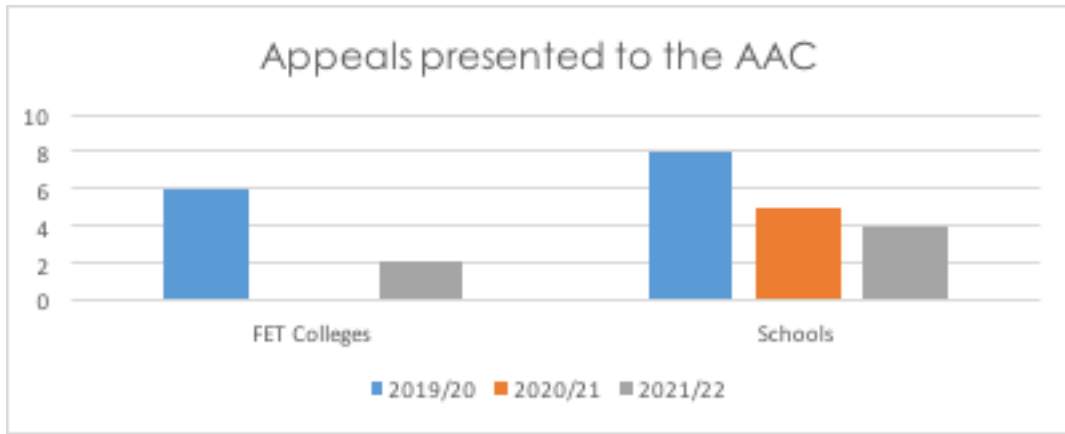1   FET: Further Education and Training

Figure 1: Appeals presented to the Accreditation Appeals Committee in 2019/20, 2020/21 and 2021/22

Appeals against no accreditation decisions

From 1 April 2019 to 31 December 2021, 252 institutions were granted an outcome of no accreditation (189 independent schools, 48 private further education and training (FET) colleges and 15 private Adult Education and Training colleges). Of these, 25 applications proceeded through the appeals process to be presented to the AAC. Four appeals were successful. In these cases, the appellants were given an opportunity to present evidence for the ACC to consider in reviewing the accreditation decision. Overall, this represents 1.5% of no accreditation decisions of the ACC made between 1 April 2019 and 31 December 2021, which have been reviewed by the AAC. The appeals were successful based on procedural matters rather than an incorrect decision being made at the time of the evaluation. This is evidence of the rigorous and reliable processes in place in considering the outcome of applications for accreditation.

Figure 2: Appeals against no accreditation decisions from 1 April 2019 to 31 December 2021

Common mistakes leading to failure of appeals

No.	Mistake	Requirement
1.	Institutions appeal the "no accreditation" decision on the basis that they put measures in place after the evaluation.	Measures put in place after the evaluation do not constitute grounds for an appeal since a decision is taken based on the information available at the point of evaluation.
2.	Independent schools change premises without first obtaining a document from the provincial education department indicating that the school is authorised to operate at the new physical premises.	A document from the provincial education department indicating that the school is authorised to operate at the current physical premises, and the grades that may be offered must be provided.
3.	Institutions do not meet the requirements for teachers who hold professional teaching qualifications and have current registration with the South African Council for Educators (SACE) at the point of evaluation.	At least 80% of the teachers must hold a professional teaching qualification, together with current registration with the South African Council for Educators. (Note: in terms of Section 21 of the South African Council for Educators Act, "no person may be employed as an educator by any employer unless the person is registered with the Council".
4.	Institutions do not have a current health and safety certificate at the point of evaluation.	A current health and safety certificate, no older than two years, issued by a local municipality or an accredited occupational health and safety officer, is required.
5.	Institutions do not have audited financial statements for the most recent financial year at the point of evaluation.	Audited financial statements by an independent registered financial officer for the most recent financial year must be submitted. (Umalusi considers the most recent financial year to be within six months of the financial year end).
6.	The Grade 12 results are below the national average at the point of evaluation.	The Grade 12 results of the school must be on par with or above the national average.

Conclusion

Umalusi follows the prescripts of the law in giving private providers of education and training an opportunity to appeal against an accreditation decision or outcome felt to be unjust. The AAC was established for the purpose of ensuring that institutions applying for accreditation with Umalusi receive fair and just treatment. To date,

84% of the appeals presented to the AAC have failed due to information that was not available at the point of evaluation. It should be noted that measures put in place after the evaluation do not constitute grounds for an appeal since a decision is taken based on the information available at the point of evaluation.

TRANSFORMATION IN INDEPENDENT SCHOOLS IN SOUTH AFRICA - THE IMPACT OF UMALUSI'S ACCREDITATION PROCESS

By Mary Malia and Vanessa Naidoo

INTRODUCTION

The Oxford English Dictionary defines transformation as the complete change in appearance or character of something or somebody so that it is better. The terms transformation and change are often used interchangeably. Although there is much similarity between the two terms, the dictionary defines change as a substitute or replacement of something, while transformation is more of a complete or radical change of something into something with an improved appearance or usefulness.

Since South Africa attained democracy in 1994, there has been a plethora of education policies that are aimed at transforming the schooling system from one characterised by inequalities and race-based imbalances of apartheid to one that is aligned to democracy. In the main, these education policies sought to bring about change in terms of five key goals: access, equity, redress, democracy and quality. "It is not a legal obligation, but advisable for the school to put in place mechanisms to ensure that no person is discriminated against on the basis of race, religion, sexual orientation, gender and more" (Ramkissoon, 2017).

Some of the allegations that have been levelled against schools are:

a) The school's hair policy was anti-black because learners were not allowed to show off their natural hair, illustrating schools' discriminatory hair regulations.

b) A school's code of conduct prohibits learners from wearing religious attire.

c) The lack of representivity in the school's staff.

d) A school's code of conduct forbids learners from wearing religious jewellery.

e) The lack of representation in sports teams.

This article attempts to enlighten the role played by Umalusi, through its accreditation process, in ensuring that transformation is embraced and lived by in independent schools.

ACCREDITATION CRITERIA

Section 29(3) of the Constitution of the Republic of South Africa, 1996, provides for the right of everyone to establish and maintain private education institutions (including independent schools) at their own expense. An independent school must be registered with the provincial education department prior to seeking accreditation with Umalusi.

In accordance with sections 17A(2 (a), 23(1), 23(2) and 24(1)(b) of the General and Further Education and Training Quality Assurance Act, 2001 (Act No. 58 of 2001), as amended in 2008 (GENFETQA Act), Umalusi is required to develop policy and criteria for the quality assurance of private education institutions.

With that, Council developed the Policy and Criteria for the Quality Assurance, Accreditation and Monitoring of Independent Schools and Private Assessment Bodies (October 2012), as amended and regulated on 27 October 2017.

The criteria for the accreditation of independent schools are:

• Leadership, management, and communication

• School ethos

• Teaching and learning

• School results

It is under the criterion "school ethos" that Umalusi verifies the implementation of transformation in independent schools. Independent schools are expected to give expression to an ethos that promotes and is not in conflict with the values of the South African Constitution, and to display values that reflect the specific character of the school, as articulated in the school's vision and mission statement, with specific attention to safety and discipline as required in the South African Schools Act, 1996 (Act No. 84 of 1996).

Evaluation and verification of the implementation of the school ethos

The focus of evaluation of the criterion related to school ethos is on two main indicators:

• The school's vision and mission

• The principles of the National Qualifications Framework (NQF) and the South African constitutional values

Some of the core indicators for accreditation under the criterion "school ethos" are:

a) The vision and mission of the school promote an ethos that is not in conflict with the South African Constitution.

b) In the application or execution of its ethos, the school gives expression to an ethos that promotes and is not in conflict with the values of the South African Constitution, applicable legislation and the principles of the NQF.

c) The school has evaluated or reviewed the continued relevance and effectiveness of its vision and mission statement.

d) The school's offering supports the vision and mission of the school.

e) The school supports principles underlying the NQF, as well as the South African constitutional values.

f) The NQF's principles of religious tolerance, access, relevance, credibility and progression are evident in the school.

g) Learners are taught about tolerance and respect for different religions in the school's Life Skills and Life Orientation lessons.

h) There is no form of unfair discrimination evident in the school.

The accreditation criteria and guidelines for the evaluation and verification processes are explained at the compulsory quality promotion meetings that are conducted with independent schools prior to the submission of their application for accreditation. The application for accreditation comprises two processes: the submission of a self-evaluation report and supporting evidence, and a verification site visit. The main purpose of the verification site visit is to verify the implementation of the evidence submitted during the self-evaluation process. The reports on evidence evaluated during the desktop evaluation process are used as the basis for the site verification process.

This site verification includes, among other verification processes:

• Checking evidence of review of the vision and mission statement or minutes of the review meetings and their implementation.

• Perusing minutes of meetings where discussions were held regarding the review of the school's vision and mission statements.

• Verifying whether the vision and mission statements are in line with the current practice at school, and how.

• Minutes of meetings where the principles underlying the NQF and constitutional values were reviewed.

• Evidence of transformation policies, processes and procedures, and their implementation.

Despite Umalusi's rigorous accreditation process, some reports and allegations of racism have been made against some accredited independent schools across South Africa. It must be noted that Umalusi accredits independent schools based on the evidence that was available and verified at the time of evaluation. An assumption that one can make is that some of the transformation policies are drafted and documented for mere compliance and not for envisioned change.

Accredited independent schools are subject to regular monitoring to ensure that the minimum requirements for accreditation are maintained. Institutions that fail to maintain the required standards will be given notice of intent to withdraw the accreditation, and a reasonable period within which to comply with the requirements. Failure to comply within the specified timelines may lead to withdrawal of the institution's accreditation.

THE ACCREDITATION PROCESS AND IMPLICATED INDEPENDENT SCHOOLS

Umalusi takes the allegations levelled against independent schools that are in the process of accreditation and those that are accredited seriously. Some allegations are sent directly to Umalusi, while others become known to Umalusi when they are reported in the media. Whether reported directly or indirectly, Umalusi investigates the allegations in an effort to ensure that independent schools become agents, and not thwarters, of transformation.

Equally so, the Gauteng Department of Education has shown that it takes the allegations of discrimination in schools seriously. This was evident in an article written by Thando Kubheka in 2018 on allegations that an independent

school had refused to allow a Grade 8 pupil to grow his beard as part of his Islamic practices, and where, in another school, a group of Muslim pupils were threatened with disciplinary action against wearing hijabs or head scarfs with their school uniform. The Gauteng Department of Education's spokesperson, Steve Mabona, stated: "If we feel that it's a contravention of our Constitution – we will not sit back and say, 'this is a private school and the department doesn't tell us what to do'." (Kubheka, 2018).

Umalusi's approach is to request the implicated school to respond to the allegations in writing and submit, among others, the following:

• A full report on the allegations

• Details of the measures the school has put in place to address transformation and anti-racism

• The school's policy on anti-racism

• The school's policy on transformation. The policy must address the rights to religion, cultural practice and language, and how these policies have been developed in consultation with and communicated to stakeholders.

• A transformation plan (with timelines), which includes programmes to promote social cohesion around the constitutional values of equality and non-discrimination.

Once the required documents have been submitted, the school is required to submit quarterly updates on the implementation of the transformation plan. Umalusi may also conduct unannounced verification site visits as part of the process or monitoring to verify the implementation of the policies and procedures.

Questions that could be asked during a site visit to verify the implementation of the policies, plans and procedures around transformation include:

• Explain the programme that the school has in place for training and developing staff members on diversity and transformation.

• What policies does the school have to promote social cohesion, equality and non-discrimination?

• How are the principles of transparency and information sharing applied to policy development and review?

(https://www.bing.com/images)

Schools that are still in the process of accreditation cannot be granted accreditation if, by the time of finalising their application for accreditation, there is no compelling evidence that the school implements and lives by the transformation policies. Accredited schools may be issued with a notice of intent to withdraw accreditation if there is no convincing evidence that transformation policies are observed and lived by.

CONCLUSION

Umalusi's accreditation mandate extends to independent schools, not public schools. It is a fact that there are more public schools than independent schools in South Africa. In fact, the 2021 statistics recorded 22 740 (91.35%) ordinary public schools and only 2 154 (8.65%) independent schools. Although the 8.65% may seem immensely small, the impact of Umalusi's accreditation process in contributing to transformation in South African independent schools is huge. This is because children and teachers from these schools will be able to influence their families, communities, society and the country at large. Ngqakamba (2021) cites Montjane that "there is no final destination for transformation" and that, as required by the South Africa's Constitution, schools must be supported to ensure that they fulfil their mission on transformation.

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"REFRESHER" TRAINING FOR INDEPENDENT CONTRACT WORKERS
By Dawie Oberholster

BACKGROUND

Umalusi appoints independent contract workers, who are specialists in their fields, to conduct the evaluation of accreditation applications. Independent contract workers fulfil a crucial role in the accreditation process. They are required to evaluate and interrogate evidence submitted by institutions in their applications for accreditation, and to write accurate, credible, comprehensive reports based on their findings, which will, ultimately, inform the outcome of the institution's application for accreditation.

Independent contract workers with relevant qualifications and experience must go through Umalusi's recruitment processes to be appointed. Evaluators are appointed based on their extensive experience in the management of a school or technical and vocational education and training (TVET) college, and subject specialists are appointed based on their expertise and experience in the specific fields in which they are appointed to evaluate.

Upon appointment, an independent contract worker undergoes intensive training in Umalusi's processes and requirements prior to engaging in their work in the accreditation process. It is also important that refresher training is subsequently conducted to ensure that independent contract workers keep abreast of the latest developments and to refresh their knowledge and understanding of Umalusi's requirements. Refresher training ensures that the evaluators and subject specialists are sufficiently trained and up to date with the latest knowledge and expectations in conducting evaluation and monitoring in line with the standards set by Umalusi.

Training has traditionally been conducted in-person at various centres around the country. However, due to the COVID-19 pandemic and the subsequent restrictions on travel and gatherings, the in-person training could not be conducted. This led to the Evaluation and Accreditation (E&A) Unit exploring an alternative approach to conduct refresher training for contract workers. As a result, the training of independent contract workers took place through an online platform in 2021.

FOCUS OF THE TRAINING

Training was conducted for evaluators and subject specialists contracted to evaluate independent schools, private further education and training (FET) colleges, and private adult education and training (AET) colleges. Training took place in two phases: training on the desktop evaluation processes to evaluate self-evaluation and monitoring reports, and training on conducting site visits and report writing in line with Umalusi's requirements. An important aspect of training is the focus on Umalusi's code of ethics for staff and independent contract workers to ensure that the Umalusi values are upheld during the evaluation processes. During the training, the instruments and guideline documents were discussed extensively to ensure that all evaluators have a common understanding of the requirements under each indicator.

FEEDBACK ON THE REFRESHER TRAINING

The online refresher training proved to be cost-effective, and more accessible for independent contract workers around the country. Participants found the refresher training helpful, and many issues around the accreditation process were discussed. The online mode of training was welcomed. However, the camaraderie that is established through in-person training and meetings was sorely missed, and load-shedding impacted on the ability of some people to connect online throughout the training.

CONCLUSION

COVID-19 has significantly changed the way we work and live. The new approach of online training has proved to be very effective. Refresher training is important to ensure that common approaches and standards are used by all those involved in the Umalusi evaluation processes.

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