

**SOUTH
AFRICAN
QUALIFICATIONS
AUTHORITY**

NATIONAL QUALIFICATIONS FRAMEWORK

Criteria and Guidelines for Providers

POLICY DOCUMENT

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Criteria and Guidelines for Providers



**THE SOUTH AFRICAN
QUALIFICATIONS AUTHORITY**

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Chapter 1

Overview and Introduction

The purpose of the Criteria and Guidelines for Providers

In 1999, the Authority approved the *Criteria and Guidelines for ETQAs*. This explanatory manual follows directly on that approved document. It looks at the SAQA requirements for providers – within the structures and processes required for implementing quality assurance policies and mechanisms for the National Qualifications Framework.

In keeping with the format adopted for the *Criteria and Guidelines for ETQAs*, this document is situated within the enabling and regulatory framework provided by the South African Qualifications Authority Act, 1995 (Act No.58 of 1995), the Education and Training Quality Assurance Bodies Regulations, 1998 (*Government Gazette* No.19231, 8 September 1998) and the National Standards Bodies Regulations, 1998 (*Government Gazette* No.18787, 28 March 1998).

It is this enabling framework, and the *Criteria and Guidelines for ETQAs* that formed the basis for the criteria and guidelines for providers. In addition to this base, a range of national stakeholder policies and procedures for ensuring the quality of learning provision were consulted and, where appropriate, incorporated. Emerging trends and “best practice” from local, regional and international experiences were also consulted in developing this document.

Again, in keeping with the approach adopted for the *Criteria and Guidelines for ETQAs*, the **particular purpose** of this document is to enable the implementation of quality assurance and accreditation mechanisms for providers. The contents of this document should not be viewed as only addressing themselves to a steady state of quality assurance and accreditation issues of big providers, but as an enabling framework for providers in a transitional state, including individuals and some forms of consultancies as well.

A **process approach** has been adopted which takes into account the needs for a phasing-in of some aspects of the system within the broader model of transforming the national education and training system. Therefore, it is an approach that takes into account the current requirements for ensuring the quality of learning achievements and learning provision but which moves towards the implementation of the quality assurance processes required by the outcomes-based and integrated model for education and training in the new system.

A final point of departure for this approach has been the necessity to

- accommodate historically and statutorily separate stakeholders and processes in the education and training system;
- build on the strengths and benefits of these different structures and systems to ensure that the short and long term requirements for implementing the National Qualifications Framework are met; and
- make sure that these requirements ensure that there are continual and incremental quality improvements in the learning system.

The design of the Criteria and Guidelines for Providers

This document has been designed primarily as a guide for providers to evaluate what they need to have in place to ensure the quality of learning provision and, what they need to demonstrate to the relevant Education and Training Quality Assurance body in order to be accredited as a provider. This also implies that the *Criteria and Guidelines for Providers* should not be viewed as “minimum requirements” for provision. Rather, they provide a guide as to quality processes and practices for all learning provision and learning achievement.

Users are, thus, urged to use the *Criteria and Guidelines for Providers* as a “living document” – to add their comments and notes, to insert copies of national, international, sectoral and/or organisational quality statements, policies, procedures and practices, where appropriate and applicable.

While this document is aimed at **providers**, other accredited bodies within the system – in particular, Education and Training Quality Assurance bodies – should consider the *Criteria and Guidelines for Providers* as an example of what they would be expected to have in place in order to accredit providers within their sphere of operation.

Again, the style of the document should assist such bodies in evaluating their accreditation and quality assurance policies and proposals in respect of the overall SAQA criteria and guidelines.

Structure of the document

This first section deals with the purpose of the document. The second section deals with the relationship between accredited and accrediting bodies linked to the National Qualifications Framework and details the critical importance of quality learning provision to quality learning achievements. This section is intended to assist providers in developing an understanding of where they fit in within the scope of SAQA systems and operations, and the overall quality requirements for the accreditation system.

The third section – the bulk of this document – deals with the **criteria** for the accreditation of providers and provides **guidelines** and examples of how these criteria will be implemented and operationalised by SAQA through the ETQAs.

Overview and Introduction

Abbreviations and acronyms used in this document

Please note that for the purposes of this document, Criteria principally refers to and includes the statutory provisions of the SAQA Act as well as the ETQA Regulations.

A list of the most common abbreviations and acronyms used in this document appears below.

Finally, Appendix A: Definition of Terms reproduces the definitions of SAQA terms used in the *Education and Training Quality Assurance Bodies Regulations, 1998* (September 1998) and the *National Standards Bodies Regulations, 1998* (March 1998).

ABET	Adult Basic Education and Training
CHE	Council on Higher Education
CTP	Committee of Technikon Principals
ECD	Early Childhood Development
ETQA	Education and Training Quality Assurance Body
FET	Further Education and Training
GENFETQA	General and Further Education and Training Quality Assurance Body
GET	General Education and Training
HEQC	Higher Education Quality Committee (of the CHE)
HET	Higher Education and Training
ISO	International Standards Organisation
ITB	Industry Training Board
MQA	Mining Qualifications Authority
NQF	National Qualifications Framework (also the Framework)
NSA	National Skills Authority
NSB	National Standards Body
NTB	National Training Board
OBET	Outcomes Based Education and Training
QA	Quality Assurance
QMS	Quality Management System
QPU	Quality Promotions Unit (of SAUVCA)
RPL	Recognition of Prior Learning
SAICA	South African Institute for Chartered Accountants
SAQA	South African Qualifications Authority (also the Authority)
SAUVCA	South African Universities Vice Chancellors' Association
SETA	Sector Education and Training Authority
SERTEC	Certification Council for Technikon Education
SGB	Standards Generating Body

Chapter 2

The NQF quality spiral

Understanding quality assurance in respect of the National Qualifications Framework and where providers fit within the total quality system

The structures and processes associated with the National Qualifications Framework can be conceptualised as a total quality system with built-in feedback mechanisms to ensure ongoing improvements throughout the system.

The total quality system takes as its starting point the separation of standards setting and quality assurance functions as specified in section 5 of the SAQA Act, 1995 (Act No.58 of 1995). In particular, the Act specifies that SAQA shall implement the NQF through

- (a) the registration of bodies responsible for establishing education and training standards or qualifications; and
- (b) the accreditation of bodies responsible for monitoring and auditing achievements in terms of such standards and qualifications.

In essence then, the quality process is a cycle within an upward spiral. This cycle can be seen to begin with standards setting and the consequent registration of standards and qualifications on the National Qualifications Framework. Once registered, Education and Training Quality Assurance bodies (ETQAs) will be accredited to monitor and audit the achievement of a specific set of such registered standards and qualifications.

ETQAs, in turn, and amongst other functions, will accredit constituent providers for learning provision and assessment of learning achievements against these standards and qualifications.

The outline of NQF structures and systems below captures the dynamic relationship between the separate functions of standards setting and quality assurance.

The evaluation and reporting requirements for accredited bodies provide a direct and dynamic feedback mechanism to standards setting and assist in ensuring the continual improvement of NQF registered standards and qualifications.

As the diagram indicates, the channel for communication between standards setting and quality assurance processes is through the Authority. In practice, this will mean that ETQAs will make their submissions to NSBs via SAQA. This will ensure that SAQA is able to co-ordinate and integrate the information across the bodies. This is especially critical in view of the fact that the organising fields around which NSBs and SGBs are constructed are different from the sectors within which ETQAs are accredited.

SAQA

- Statutory body appointed by the Minister of Education in consultation with the Minister of Labour
- National education and training stakeholder membership
- Reports to Parliament via the Minister of Education
- Responsible for overseeing the development and implementation of the NQF

STANDARDS SETTING

- Structured into twelve organising fields
- National stakeholder standards setting bodies with equitable representation through six stakeholder categories
- Accountable to constituencies and through the Authority to the two ministers and Parliament for development of standards and qualifications
- Responsible for recommending standards and qualifications to the Authority for registration on the National Qualifications Framework.
- Responsible for ensuring that all standards consist of clear statements of learning outcomes and associated assessment criteria together with requisite moderation and accreditation criteria.
- Responsible for ensuring the quality (relevance, credibility and legitimacy) of the standards recommended to the Authority
- Responsible for registering and, when necessary, establishing standards generating bodies
- Responsible for ensuring the review of registered standards and the development of standards setting processes where and when necessary.

**N
Q
F**

Comprised of registered standards and qualifications at eight levels

QUALITY ASSURANCE

- Structured into three sectors: economic, social and education and training sub-system.
- Organised for two principal bodies: accredited quality assurance bodies (ETQAs) and accredited learning providers.
- Decision-making structures to include national stakeholder representatives to ensure public accountability, relevance and credibility.

ETQAs:

- Accountable for the standards of learning achievements and provision in their area of primary focus.
- Responsible for assuring the quality of learning achievements within a specified context for registered standards (units and qualifications) chiefly through
 - (a) registration of assessors;
 - (b) accreditation of providers, and
 - (c) quality management system.

Providers

- Accountable to ETQA – through primary focus – for management, development and delivery of learning programmes and services leading to standards and qualifications for which they are accredited
- Responsible for ensuring the quality of the learning experience according to the requirements of the registered standards and qualifications
- Responsible for recording, researching and reporting the achievements of learners and the impact of their learning services in respect of the standards and qualifications for which they are accredited.

Moderating bodies

- Appointed by SAQA according to NSB recommendations
- Responsible for ensuring that assessment of registered outcomes is fair, valid and reliable across the NQF

Learners

Quality Assurance and Accreditation

The previous outline of the quality system for the NQF makes visible the holistic quality management system that is required for SAQA to realise its objective to **enhance the quality of education and training**.

The outline below focuses on the structures and processes that are required for the **quality assurance system** associated with the NQF. It is this outline that speaks directly to the continuum of quality assurance and quality management systems required for the accreditation, monitoring and auditing of ETQAs and providers. Furthermore, it is this quality assurance system that talks directly to the assessment of learners and learning achievements.

In quality terms, this cycle can be said to include all the critical points in the quality process:

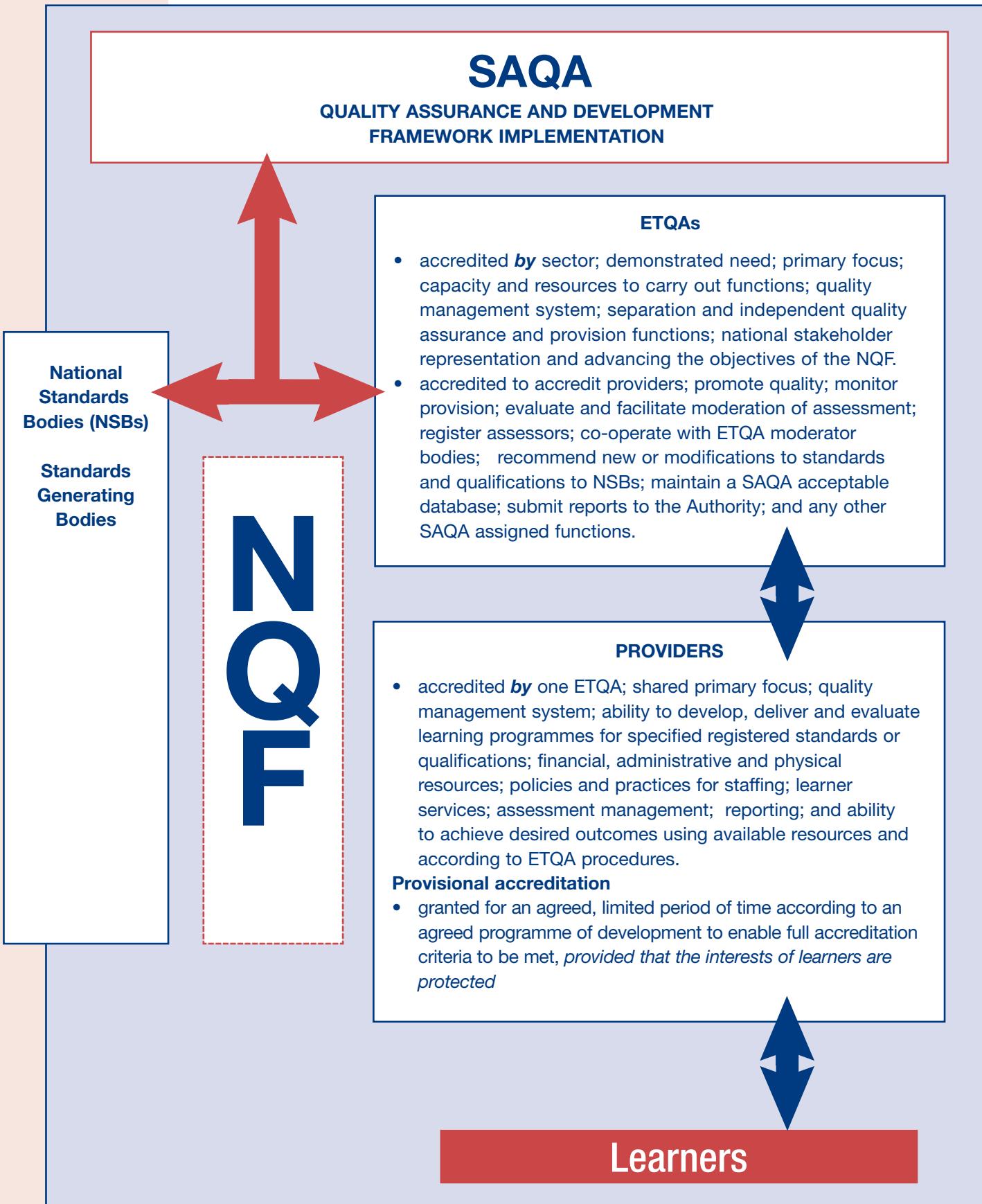
- **The product or outcome:** awards; achievement of standards or qualifications; accreditation.
- **The inputs:** learning provision; programmes; learning and learner resources; life or experiential learning.
- **The process:** the quality of the learning and assessment interactions; the quality of the monitoring and auditing interactions.

Linking standards setting and quality assurance together in the quality system

The central mechanism which allows the Standards Setting and Quality Assurance processes to act together to ensure the quality of standards and qualifications registered and achieved is the form in which these are registered on the NQF. The form in which standards and qualifications are described and registered by SAQA has to enable all the learning delivery, assessment and certification structures and processes to implement the outcomes and requirements developed through SGBs and NSBs.

Critical elements for quality assurance will be the assessment, moderation and accreditation criteria developed for each standard and qualification. ETQAs will have to conduct their assurance of learning achievements in accordance with these criteria and ensure that they are able to interface with standards setting processes in an unambiguous and clear manner.

The NQF quality spiral



Aspects of the current system that need quality improvements

Some of the features of current education and training provision that have a negative impact on quality are highlighted in the quotes below:

- inadequate and/or badly maintained infrastructure;
- enormous distances in some provinces, compounded by the lack of any transport infrastructure in many areas;
- lack of communication facilities, leading to a lack of information on, and support for, new developments in education approaches, new curricula and resource use (such as technologies);
- lack of access to libraries and other resources;
- lack of access to peer group support – among learners, educators and educational providers;
- lack of a supportive environment for pedagogical and professional development; and
- the absence of a flexible opportunity and reward structure to encourage educational providers to invest time and effort in transforming education and training through strategies designed to enhance teaching and learning processes, including the use of technology.¹

Amongst the inputs which contributed to the *Skills Development Act, 1998*, the Department of Labour made the point that the Professional and Vocational Education and Training (PVET) system needed to break with past practices where vocational education and training was “associated with a second rate education for those who ‘failed’ or dropped out of academic education and which focused on narrow, rote learning, confined to the details of particular tasks within jobs, for most black workers.”² In addition to this, the Department listed the following additional problems that characterised the system:

- The PVET system lacks national cohesion. This is manifested in a lack of foresight regarding the skills requirements related to our economic and development strategies, a lack of national priorities, and a lack of norms and standards to effectively guide the allocation of public resources for training.
- there is no framework to enable people to make informed decisions on how to enter the labour market and progress through career pathing.
- There is no labour market and skills related information available to guide the PVET choices of individuals, training providers, SETAs and government departments at national and provincial levels.

¹ *Draft Document on Criteria for Quality Distance Education in South Africa: A Statement of Policy* by the Centre for Educational Technology and Distance Education, June 1998, pp.2-3

² *A new integrated human resources development strategy for South Africa* Working document prepared by the Department of Labour, Chief Directorate Human Resources Development and Career Services, August 1996: p.12 and p.17.

Chapter 3

Criteria and Guidelines for the Accreditation of Providers

The Scope for the Accreditation of ETQAs

In order to pursue its objectives and execute its functions, SAQA is required to accredit bodies that will be responsible for monitoring and auditing learning provision and learning achievements against *NQF* registered standards and qualifications.

In accordance with the provisions of the *SAQA Act*, *Regulations* have been gazetted that outline the roles and responsibilities of various bodies within the new education and training system.

These *Regulations* specify that:

- a) there shall be bodies responsible for monitoring and auditing achievements in terms of standards and qualifications registered on the NQF;
- b) such bodies shall be accredited and their activities monitored to determine and demonstrate compliance with SAQA requirements;
- c) such bodies shall be established under relevant legislation and accredited by SAQA with due regard for the Constitution, Parliamentary and provincial powers and in consultation with national education and training stakeholder representatives; and
- d) such bodies shall be accredited with due regard for any accredited functions shared with other bodies in the accreditation system.

A model for implementing ETQA accreditation

The model which currently makes most operational sense for implementation in the first phase of ETQA accreditation takes its starting points from the following pragmatic realities:

- a) SAQA accredits ETQAs.
- b) ETQAs can be accredited in one of the three sectors for a particular set of NQF qualifications and standards.
- c) Those bodies which currently have legal or statutory accreditation, assessment and quality assurance functions will be the first focus for accreditation evaluations, and this will be against existing national qualifications recorded on the interim database.
- d) The first phase of accreditation will build on what exists and on practices that will be in place until at least 2001.
- e) The first phase also takes into account the fact that most of the professional bodies have direct statutory powers for accreditation, which they have indicated they wish to retain.
- f) Discussions with professional bodies and the Department of Labour indicate support for the broad outlines of the model. Moreover, indications are that there could be support for the model amongst some of the stakeholders and role-players in higher education and

training and in SETAs (for example, the Mining Qualifications Authority Memorandum of Understanding with Professional Bodies).

Essentially the proposed model accepts that there will be some duplication in the award of standards and qualifications across ETQAs and that the central issue to be addressed is the relationships between and amongst different kinds of ETQAs. The following diagram indicates the two sectors in which we know that ETQAs will be accredited – the economic sector, and the education and training sub-system sector – and the presumed qualifications and standards for which each will be responsible.

Bands	Levels	Qualifications	Education and Training sub-system sector ETQAs	Economic sector ETQAs
Higher Education and Training (HET)	8	<ul style="list-style-type: none"> • Doctoral degrees • Masters degrees • Professional degrees • Honours degrees • First degrees • Diplomas • Certificates 	The Council on Higher Education (CHE) and its standing committee: the Higher Education Quality Committee (HEQC)	SETAs
	7			
	6			
	5			
Further Education and Training (FET)	4			Professional Statutory Councils
	3	Further Education and Training Certificate (FETC)		
	2		The General and Further Education and Training Quality Assurance Body (GENFETQA)	Professional Institutes
General Education and Training (GET)	Level 1 including Adult Basic Education and Training (ABET) Levels 1 to 3	General Education and Training Certificate (GETC)		

Criteria and Guidelines for the Accreditation of Providers

In addition to the overlaps between each education and training sub-system and economic sector ETQA, there are also, overlaps between the two dominant forms of economic sector ETQAs.

For example, some of the statutory health councils have indicated that they want or have powers over the accreditation of providers and the certification of learners at levels below the equivalent of level 5 on the NQF. Moreover, some SETAs have indicated that they would want ETQA functions in the Higher Education and Training Band.

The lens for the implementation model for this phase is to build on international and local models which distinguish between institutional and programme evaluations and accreditation and add the dimensions of formative and general qualifications.

The model starts by holding that the integration of institutional and programme audits and evaluations is critical to the quality improvement spiral. However, this integration can be achieved in a number of ways without it having to rest in a single body. That is, this integration can be reached through a combination of structured relations and practices appropriate to the particular qualification (or standard) and to the institution or provider.

In the current critical scenario in South Africa most multi-purpose providers would have to be accredited by the relevant education and training sub-system sector ETQA, for example, the Council on Higher Education in the Higher Education and Training Band. SAQA would expect the primary focus for such multi-purpose providers to be formative education and training across a spectrum of learning pathways. (Please note that this includes professional degrees, Masters degrees and PhD research degrees).

Most single purpose providers are then likely to be accredited by an appropriate economic sector ETQA, for example, SAICA, or MQA. Here SAQA would expect the primary focus of such single purpose providers to be education and training within a specific or particular learning pathway, necessitating a one-to-one correspondence with the primary focus of the ETQA. (This approach is in keeping with the extension of accreditation sections in the *ETQA Regulations* [RSA, 1998a].)

The education and training sub-system sector ETQA would then be responsible for all general and formative qualifications. For example, the CHE would have responsibility for all general and formative degrees – BSc; BA; BCom – and for the quality assurance of all multi-purpose providers in the HET band.

The relevant economic sector ETQA would have responsibility for all professional or occupational qualifications and standards - that is, all qualifications linked to occupational or professional practice - and for the quality assurance of single purpose providers.

In the case of specialised (occupational or profession-specific) qualifications and standards, the model calls for the education and training sub-system sector ETQAs and economic sector ETQAs to have contractual arrangements in which quality assurance activities for programme evaluations, linking the two evaluations – institution and programme. Linking the two evaluations also reduces the frequency with which a single department or faculty would have to undergo an audit or evaluation process.

In the case of the economic sector ETQAs, the model recommends that the education and training sub-system sector ETQAs have a similar contractual arrangement whereby the education and training sub-system sector ETQA would team up with the economic sector ETQA to accredit single purpose providers. Current practice is such that evaluation and audit teams comprise a range of expertise and interests to be represented in the evaluation (institutional and programme, internal and external).

The proposed model is in some sense the formalisation of these arrangements.

Justifiable need

In order to be able to accredit an ETQA, the *Authority* must be persuaded of the necessity for that particular ETQA. The organisation applying for accreditation is therefore required to demonstrate that it is necessary and, hence justifiable, to establish such an ETQA within the identified sector.

Some of the evidence that would fit within this category could include:

- The legislation under which the organisation seeking accreditation has been established.
- The current and projected numbers of constituent providers and learners that would be affected by the accreditation of the organisation as an ETQA.

Primary focus

This is defined in the *ETQA Regulations* as “that activity or objective within the sector upon which an organisation or body concentrates its efforts” and includes the NQF registered standards and qualifications that would be quality assured by such an accredited ETQA.

In its application, the organisation needs therefore to indicate both the sector and the standards or qualifications for which it wishes to be accredited. In specifying this, the organisation should state the activities or objectives within the sector on which it will concentrate its efforts. That is, the primary focus for learning and learning achievements that it will audit and monitor.

It should be noted that the primary focus for an ETQA is based upon the association of the ETQA applicant with the sector for accreditation and the identified mission of that sector. This ensures that the NQF principles of coherence and relevance are reflected in the accreditation of ETQAs.

For example, the *Higher Education Act* specifies the purpose and objectives of Higher Education as related to knowledge production and national development, generally as well as for the individual. The *Mines Health and Safety Act* specifies the purpose and objectives of the Mining Qualifications Authority in respect of broadly similar purposes and goals and adds detail specific to that particular economic sector.

In addition to this information regarding the identified mission of the organisation or body, information regarding the standards and qualifications for which accreditation is being sought could include:

- The NQF band(s) and level(s) of primary focus.
- The specific standards and qualifications that it wants to quality assure.
- The relation of the band(s) and level(s) to a coherent, progressive pattern of registered standards or qualifications within learning pathways.
- The relation of the standards or qualifications to articulation and portability within the identified pathway, other providers or ETQAs, and other pathways.

Criteria and Guidelines for the Accreditation of Providers

A model for providers

SAQA's organising principle for the provider to ETQA relationship is a simple one-to-one relation. Namely, that the provider is accredited by one ETQA on the basis of primary focus. Providers will need to ask themselves similar questions to those outlined above in order to identify the ETQA from which they should seek accreditation.

The first issue to be decided would be which ETQA sector the provider falls within and then which are the NQF registered standards or qualifications that it wishes to provide. This should indicate the ETQA to which the provider should apply. There may be some instances in which the indication is not as clear as it should be. The provider is then advised to approach SAQA for further guidance. Providers should note that even if they are multi-purpose providers for a range of standards and qualifications in different areas of learning, there will probably be a number of ETQAs involved in the ongoing accreditation and quality assurance of the institution, particularly in relation to the different learning programmes, courses and assessments on offer. To all intents and purposes this multiplicity of relations will not impact on the provider in that the accrediting primary focus ETQA will take the responsibility for organising the necessary evaluations and even site visits with all relevant parties.

Criteria for the accreditation of providers³

Accreditation is defined in the ETQA Regulations as

the certification, usually for a particular period of time, of a person, a body or an institution as having the capacity to fulfil a particular function in the quality assurance system set up by the South African Qualifications Authority in terms of the Act.

The *ETQA Regulations* essentially provide for SAQA to accredit Education and Training Quality Assurance bodies who, in turn, are responsible for the accreditation of providers.

There are a number of criteria that emerge from the *Criteria and Guidelines for ETQAs* that assist in identifying providers within ETQA sectors. These include the identified ETQA sector and the concept of primary focus.

What are the frequently asked questions?

There are still issues pertaining to the accreditation of providers that need further clarification. These have been included and possible solutions put forward. The inclusion of these issues should not, however, be perceived as an impediment to beginning implementation in the first phase of accreditation.

³ A provider is accredited once it has been registered under relevant legislation. Currently, the one form of registration that is associated with accreditation pertains to DoE legislation: Higher Education Act, the FET Act and the SA schools Act. These acts refer to providers that offer whole qualifications. [In terms of SAQA regulations, a whole or full qualification is a certificate which has a minimum of 120 credits.]

Registration and accreditation

- (a) Do all providers that offer whole qualifications, including company training centres, have to seek registration with the DoE? The South African Airways training centre is an example of this group.
- (b) How do providers who do not offer whole qualifications attain registration?
- (c) How do workplace learning sites attain registration?
- (d) Is DoE legislation the only means of attaining registration?

Accountability for extension of accreditation

- (a) Which ETQA does the provider pay for quality assurance services?
- (b) Which ETQA issues the accreditation certificate?
- (c) Which ETQA manages and administers the extension of accreditation?
- (d) Which ETQA does the evaluation, monitoring and auditing of the provider?
- (e) To which ETQA does the provider report on the extension of standards and qualifications?
- (f) Which ETQA reports to SAQA on those standards and qualifications that are affected by the extension?

Possible solutions

Registration and accreditation

Perhaps registration needs to be defined so as to include regulations under acts other than DoE legislation. One would imagine for instance that the SAA Training Centre or any other pilot training centre would be registered in terms of the *Civil Aviation Authority Act*.

SAQA therefore needs to spell out what registration means so that it encompasses compulsory registration under all legislation. Attaining registration for providers who do not offer whole courses is an issue that needs to be looked at. Primarily the definition of registration needs to incorporate short courses into the system.

Currently company or sector-specific training sectors do not have to seek registration with the DoE if they can provide evidence of registration covered by other acts.

Another suggestion that has been mooted from time to time relates to a type of one-stop shop where the primary ETQA does everything. ETQA regulations actually contain provisions pertaining to issues such as financial viability and management capacity.

Accountability for extension of accreditation

The suggestion is that the primary ETQA should have the final accountability and that it should manage and administer the extension of accreditation. Where two ETQAs are involved, they would naturally have to agree on the framework for their collaboration or partnership. Such collaboration could mean that:

- The provider would pay its primary focus ETQA for quality assurance services;
- The primary focus ETQA would issue the accreditation certificate that has the endorsement of the other or secondary ETQA;

Criteria and Guidelines for the Accreditation of Providers

- In terms of the framework of partnership and collaboration, the two ETQAs could have discussions about how the money paid by the provider is to be utilised. The primary focus ETQA would then issue the accreditation certificate with an endorsement signifying approval by the secondary ETQA;
- The extension ETQA would evaluate, monitor and audit the provider. However, this would be under the management and co-ordination of the primary ETQA;
- The provider reports to its primary ETQA;
- The primary ETQA reports to SAQA on all standards and qualifications delivered by its providers, including the ones affected by extended accreditation. It would also submit information to its partner ETQA on the standards and qualifications affected by the extension. Providers whose primary function is to facilitate learning, could in all likelihood, be exempted from this report-laden option.

What is a provider?

The ETQA Regulations define a provider as

a body which delivers learning programmes which culminate in specified National Qualifications Framework standards or qualifications and/or manages the assessment thereof

An education and training body, in other words a provider, is not limited to an institution or organisation. Providers can include companies, work-based training centres, a collaboration amongst a range of partners (organisations, institutions, companies, tuition centres, RPL centres, assessment centres, trade testing centres, individuals, community structures) and even some forms of consultancies.

According to the *ETQA Regulations*, an examining body may apply for accreditation as an ETQA and/or moderating body, as well as registration as an SGB. In some respects, it may be advantageous to accredit examining bodies as part of the provider system, i.e. a type of provider which is not responsible for the delivery of learning programmes. For example, the provider would specify an examining body as a body responsible for managing the assessment of the standards and qualifications for which they wish to be accredited.

Provision can also take a variety of forms including contact, distance, mixed-mode, self-directed and on-the-job and can take place through a variety of mediums including “chalk-and-talk”, “sit-by-Nellie”, through to multimedia and hypertext. Provider categories could be outlined as follows:

Delivery only site

This is a provider who is responsible for training and formative assessments.

Assessment only site

This is a provider who is responsible for summative and RPL assessments. In addition to

mentoring and coaching, RPL assessment sites require practitioners who are able to assist the candidate through the process of making explicit what it is that they know and preparing the candidate for the assessment itself.

Delivery and assessment site

This is a provider who delivers learning programmes and manages the assessment thereof.

The following matrix depicts the relationships between the various categories of providers. It allows for the integration of theory and practice, training, assessment and experiential learning through a number of different sites and indicates the possible relationships between sites.

	Training	Assessment	Training & Assessment
Theory			
Practice			
Theory & Practice			

The above matrix hints at the possibility to propose that providers (delivery, assessment, etc) can be accredited within each of the blocks on the basis of the agreements that exist for the full requirements of the qualification or unit standard. For example, a workplace offering training and assessment would indicate that their learners would be receiving the theoretical elements through an accredited provider (distance or face-to-face) and how the integration of these would take place.

What is the link between a provider and an ETQA?

Criteria on their own cannot guarantee quality improvements. These criteria have to be linked into a ...

... “broader national quality assurance strategy that includes a measure of external quality control as well as the development of internal quality processes.”⁴

The SAQA approach, as provided for in the SAQA Act, is a cascade-model of external quality assurance controls and mechanisms based on an internal quality management and evaluation system. In this approach, criteria and guidelines from SAQA set the broadest framework within which ETQAs and providers are accredited. *The Criteria and Guidelines for ETQAs* together with these *Criteria and Guidelines for Providers* form the basis for accrediting and monitoring ETQAs and set the parameters for ETQA accreditation and monitoring of providers. In this way the broad external indicators and requirements form the guidelines for secondary accreditation and internal monitoring by accredited providers.

⁴ Ibid, p5.

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The ETQA is the body which accredits the provider and which is responsible for ensuring that the provider maintains and improves the quality of learning provision and learning achievements.

The relationship of providers to ETQAs is governed through the notion of “one provider to one ETQA” based on the principle of a shared primary focus. This is captured in the *ETQA Regulations* as follows:

A body may be accredited as a provider by an Education and Training Quality Assurance Body whose primary focus coincides with the primary focus of the provider.

Criteria for Providers

In order to be accredited, SAQA has stated that,

A body may be accredited as a provider by an Education and Training Quality Assurance Body whose primary focus coincides with the primary focus of the provider, provided that the body seeking accreditation –

- (a) is registered as a provider in terms of the applicable legislation at the time of application for accreditation;
- (b) has a quality management system which includes but is not limited to –
 - (i) quality management policies which define that which the provider wishes to achieve;
 - (ii) quality management procedures which enable the provider to practise its defined quality management policies; or
 - (iii) review mechanisms which ensure that the quality management policies and procedures defined are applied and remain effective;
- (c) is able to develop, deliver and evaluate learning programmes which culminate in specified registered standards or qualifications;
- (d) has the –
 - (i) necessary financial, administrative and physical resources;
 - (ii) policies and practices for staff selection, appraisal and development;
 - (iii) policies and practices for learner entry, guidance and support systems;
 - (iv) policies and practices for the management of off-site practical or work-site components where appropriate;
 - (v) policies and practices for the management of assessment which include appeals systems;
 - (vi) necessary reporting procedures; and
 - (vii) the ability to achieve the desired outcomes, using available resources and procedures considered by the Education and Training Quality Assurance Body to be needed to develop, deliver and evaluate learning programmes which culminate in specified registered standards or qualifications contemplated in paragraph (c); and
- (e) has not already been granted accreditation by or applied for accreditation to another Education and Training Quality Assurance Body contemplated in Regulation 2 of the ETQA Regulations.

Each of these elements is discussed in more detail below.

(a) Accreditation of registered providers

The *ETQA Regulations* require that the body or organisation applying to be accredited as a provider has to be so registered, in terms of the applicable legislation at the time of the application for accreditation.

(b) Quality management system

The requirement is that the provider has a quality management system which includes policies, procedures and mechanisms to review these.

In keeping with the *ETQA Regulations*, this can be summarised as a requirement that the provider must be able to demonstrate to the relevant ETQA that it has a quality management system which includes quality management policies and procedures as well as review mechanisms to ensure that the **degree of excellence** specified for provision and assessment is achieved.

The **degree of excellence** specified should be indicated and reflected in the mission statement and objectives of the provider. In essence, this requires that the provider has a **purpose** that is informed by national, sectoral, local and learner requirements within the context of accessible, affordable and cost-effective quality systems for delivery and assessment.

Elements linked to the **purpose** of the provider (“mission statement”)

- a clear and unambiguous statement of the goals and principles by which the provider operates;
- a clear statement of the areas of learning in which the provider operates and the services provided in respect of these areas. For example, this would include the NQF registered standards and qualifications and the range of services (tuition, tuition and assessment, etc.) to be provided as well as the learner audience the provider will direct these at;
- an explanation of how quality management and other provider policies and strategic plans are reflected in and driven by this purpose, including how these relate to national, sectoral and local contexts and are responsive to change requirements; and
- a clear and unambiguous commitment to learners.

Elements linked to the practices of the provider include

- strategic business and operational plans that give direction to the provider over the period of accreditation and clearly reflect the purpose of the provider;
- strategic business and operational plans that are realistic and designed to enable the provider to meet both quality improvement and sustainability requirements;
- procedures and methods for the implementation of plans and policies that are documented and easily available to staff, learners and other clients of the provider;
- mechanisms to monitor and review the implementation of plans and policies that are implemented, maintained and recorded; and
- mechanisms for ensuring that the evaluation and amendment of policies and plans are implemented, maintained and recorded;

Amongst the policies and practices that providers need to ensure they cover – depending on their type and form of provision – are the following:

Criteria and Guidelines for the Accreditation of Providers

- programme/course development and design;
- materials development;
- teaching and learning services and responsibilities;
- learner support, access issues including equal opportunities, authenticity of assessment evidence and appeals systems, as well as the use of tutors and mentors and learning resources;
- the language of teaching and learning;
- assessment;
- finances, fees and payment regulations⁵;
- collaboration and partnerships;
- management and administration;
- marketing;
- evaluation and research;
- internal quality assurance mechanisms and reviews;
- quality assurance reviews and accreditation.

(c) Learning programmes: development, delivery and evaluation

A learning programme is defined as the process through which the learner achieves the standard/s or qualification.

In respect of programme development, the *Draft Document on Criteria for Quality Distance Education in South Africa*, summarises the criterion for programme development as:

Programmes are flexible and designed with national needs as well as the needs of prospective learners and employers in mind; their form and structure encourage access and are responsive to changing environments; learning and assessment methods are appropriate to the aims and purposes of the programme.

The elements of the programme include its relationship to the registered standard/s or qualification in respect of learning outcomes and purpose as well as assessment and accreditation requirements.

Also included would be the style of learning and teaching (including training), key features of the learning environment, learning and learning support resources and requirements, assessment methods, policies and practices for the management of assessment including equal opportunities, authenticity of assessment evidence and appeals system and any other requirements necessary for the successful completion of the programme.

In respect of quality indicators such as relevance, programmes should be developed on the basis of a needs analysis of learners, the community or constituency which the provider services and should include an audit of existing programmes, market research, national and

5 This will apply in instances where theory and practice are integrated in learning provision or when assessment is conducted outside the learning institution.

provincial priorities and liaison with other education and training institutions, occupational and/or professional bodies.

In respect of the integration quality indicator, programmes should be designed to include theoretical and practical learning components and, wherever possible and appropriate, experiential learning. The programme should be designed and outlined to reflect the integration of the relevant critical cross-field outcomes, particularly those specified in the standard or qualification.

In respect of the access quality indicator, entry requirements for the programme should be as open as possible and make provision for the recognition of prior learning and exemptions⁶.

In addition to entry requirements, there should be a stated language policy for the programme that is based on national language policy, on the language profile of the learners and on career and further or higher learning contexts. This policy must be reflected in the learning materials, assessments and learner support services.

(d) (i) Financial, administrative and physical resources

A critical aspect of quality is the governance for and management of provision. Within this, the key relations would be clear lines of responsibility and accountability within the provider – for example, staff-management chains – and between the provider and the governing body of the provider. The structure and composition of the governing body would depend on the type of provider. For example, a university, technikon, college or school may have a governing council whose composition is laid down in national policy while an in-company training centre may have an executive or board structure whose composition is laid down in company or enterprise policy.

A key feature of the administrative resource requirements would be the database of learner information and learner records. Policies and procedures for the accurate capturing, maintenance and regular updating of learner information and records will be required and monitored.

Facilities, equipment and learning materials must support the learning process and must be appropriate to the learning services that are provided. Suitable policies and procedures for the management, maintenance and upgrading of facilities, resources and materials are required. Staff and learners must be trained in the use of the materials, equipment and facilities as well as the provider's communication and information systems.

In respect of adequate financial resources, the provider will be required to demonstrate that they have the necessary financial resources to sustain the learning services throughout the period of accreditation. In addition, the provider should demonstrate that proper budgetary and financial management processes are in place including the allocation of resources adequate to the requirements for providing and developing quality learning services. An important element of this criterion would be the evaluation of the financial policies and procedures in respect of the goals and mission of the provider as well as the relationship of the financial system to the attainment of the provider's goals and objectives.

6 It may well be that the policies and procedures for the Recognition of Prior Learning (RPL) will include meeting programme entry requirements as suggested here or it may be that RPL is linked to the award of credits and qualifications and providers could have more discretionary powers in setting alternative entry scenarios appropriate to individual or learner groupings.

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(ii) Staff selection, appraisal and development

The organisation will have to provide details of its staffing policies and procedures, including recruitment, selection, appointment, promotion and termination. Sufficient staff (full-time or contractual) suitably qualified in the subject or sector and assessment will have to be shown to be available to ensure the quality of the learning experience and achievement of the specified standards and qualifications.

Evidence of policies and procedures for staff development and staff development opportunities will be required. These policies and procedures should allow both for the needs of the organisation as well as individual and professional development requirements to be met.

(iii) Policies and practices for learner entry, guidance and support systems

This must link to motivation for reporting requirements: learner information is used to design programmes, courses, materials, learner support, and guidance services that are flexible and learner-centred.

In respect of ensuring a quality experience for all learners, learners' special needs need to be considered in the design of course and learning support materials, assessment arrangements and communication with teachers, tutors, lecturers, educators or trainers. Learners with special needs also need to be taken into account in the design of the institution which should be relevant to the form of delivery of learning programmes.

Learner guidance is a form of learner support that should be available at a minimum of three points in the learning process, unless the learning programme dictates otherwise. Learners need to have access to reliable advice and information before they enrol in a particular programme, during the period they are engaged in the learning programme and when they complete the programme. Considerations of age, race, gender and language should be made in order to render this service as accessible as possible. The *Draft Document on Criteria for Quality Distance Education in South Africa* captures this as follows:

Before they enrol, learners need guidance about choice of course or programme. Once enrolled, they need information and guidance about payment of fees, registration procedures, requirements of the course, contact sessions and assessment procedures. ... In addition, learners need advice on matters of learning management – such as choice of courses and learning pathways, how to work with the course materials, how to tackle assignments, how to plan their study; they need academic support to develop the skills of reading, writing and study that are required for successful completion of the course. Learning management counselling can be written into the course materials or provided on an individual or class basis. ... After the learner completes the programme, s/he may need career advice or advice about further learning opportunities.

For the term tutor, there are a number of alternatives, including teacher, lecturer, trainer, educator, practitioner and mentor. In the same way, the words programme and course can be interchanged with assessment or assignment for recognition of prior learning purposes.

(iv) Policies and practices for managing off-site practical or work-site components (where appropriate)

In respect of components of learning delivery which do not happen under the direct management of the provider, it is expected that the provider should give evidence of how they will assure the quality of the “practical” or “experiential” element of the learning programme.

Mechanisms for ensuring valid “off-site” learning experiences and for safeguarding the rights of learners in this process will be required. As part of the system for practical or experiential learning, the provider will need to give evidence for managing assessment across sites and for the maintenance of learner information.

(v) Policies and practices for the management of assessment

The education and training system is one in which learning attainment is based on achievement through appropriate assessment of learning outcomes specified in NQF registered standards and qualifications. Assessment can thus be defined as a measurement of the achievement of the learning outcome/s.

The following elements, amongst others, need to be taken into account in designing, implementing and maintaining the assessment system:

- the assessment strategies must be in keeping with the aims and outcomes of the learning programme or course as these relate to the outcomes specified in the standard or qualification.
- a range of parties is involved in the assessment of learners. This can be designed appropriate to context and outcome and can include self-, peer and other forms of group assessment. Moderators for assessment and even assessment monitors can be included in this grouping.
- a range of assessment instruments is used in the assessment of learners. This can be designed in accordance with the context and outcome.
- The timing of assessment must be flexible in order to accommodate the various and peculiar needs of learners.
- Assessment information, including learning outcomes, assessment criteria as well as assessment procedures and dates, should be provided to all learners and assessors.
- Records of assessments must be kept and learners must receive detailed and accurate feedback on their progress and performance.
- The processes and results of assessment must fulfil the requirements of the NQF standards and qualifications for which the provider has been accredited and must meet the requirements of the ETQA.

Appeals procedures

A critical issue supporting good assessment systems design and management is that of appeals. This involves ensuring that learners have access to appeal an assessment outcome either to the facilitator of learning and/or assessment and if unsatisfied to the management of the provider and, in the final instance, to the ETQA.

(vi) Reporting procedures

The following requirements have been placed upon ETQAs for reporting to SAQA. While

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ETQAs may add requirements, providers would be expected to report to ETQAs in keeping with the SAQA reporting requirements.

Learner records: Every provider will be required to demonstrate that they have a system and the facilities for maintaining and updating detailed information about past, present and potential learners. This requirement is essential in order to be able to meet the ETQA reporting requirements and should include the following learner information:

- Name and unique learner number (possibly an ID number or a SAQA generated number)
- Contact details
- Demographic information (age, race, gender, geographical location, occupation – if applicable)
- Education and training background and experience (prior qualifications; prior learning and previous learning experiences; learning skills; language skills and preference)
- Special learning needs (relevant disabilities or learning difficulties)
- Additional learning needs (necessary experience and knowledge of relevant technology)
- Resource factors (place and time of learning, access to resources including electricity and technology, financial resources for additional learning or support materials)
- Motivation for entering a programme of learning
- Programme/s for which the learner is registered
- Performance during the programme (internal and continuous assessment)
- Achievement during and at the end of the programme (internal and external assessment, final assessment, award achieved)

In addition to enabling the ETQA and SAQA to maintain accurate information on national learner and learning profiles, this information can serve many of the quality requirements for the provider including the evaluation of its policies and practices.

Knowledge of learners and their needs is essentially what drives the **purpose** and policies of the provider. This information is also used to design learning programmes, modules or courses within programmes or to NQF standards, materials, and learner support systems and services. Updating and reviewing this information in a formal and regular way allows the provider to develop a flexible and learner-centred approach to learning provision and learner assessment.

One of the issues that must be borne in mind by all providers, both in designing systems to store learner information and for reporting, is that of **learner confidentiality**. Such systems should be designed taking the needs of different users into account.

Reporting and information storage requirements need to address at least two broad groupings. The first grouping is the accreditation and quality assurance bodies. Within this, the first user would be the learner herself. Then, in direct relation to the quality of the learning interaction, would be the teacher, tutor, lecturer, educator or trainer. Closing this information loop would be the institution and then the institution's reporting process to the ETQA body.

The information transfer to the ETQA needs to be designed with security of learner information in mind. Providers also need to have policies in place for the learner information they release, for example, to someone sponsoring the learner. With respect to reporting on learners and learner achievements, the constitutional right to privacy needs to be taken into account when designing what and how information will be stored for each learner.

The second grouping is also directly related to the quality of the learning experience but require general information about learners for improving the quality of the learning experience. These are those bodies involved in the design and development of assessments, learning materials, courses, programmes and systems – to the extent that these are separate from the teacher, tutor, lecturer, educator or trainer.

How do providers identify an appropriate ETQA?

In the draft *Criteria and Guidelines for ETQAs*, a model for accrediting ETQAs is put forward based on a combination of identified sector, primary focus, justifiable need and minimum duplication. This proposal is captured below to highlight what the ETQAs are and thereby enable providers to identify which body they may need to begin talking to about accreditation.

Chapter 2 of the ETQA Regulations specifies that

- (1) Education and Training Quality Assurance Bodies shall be accredited in each sector by the Authority for the purpose of monitoring and auditing achievements in terms of national standards or qualifications, and to which specific functions relating to the monitoring and auditing of national standards or qualifications shall be assigned in terms of section 5(1)(b)(i) of the Act.
and
- (3) An organisation or group of organisations seeking accreditation as an Education and Training Quality Assurance Body shall be established in one of the following sectors:
 - (a) A social sector;
 - (b) An economic sectors; or
 - (c) An education and training sub-system sector.

In respect of **education and training sub-system sector ETQAs**, the dominant model that has emerged is that of two ETQAs for each of the three bands on the NQF; one for the Higher Education and Training band and the other for the General and Further Education Training bands.

This model was adopted in the “Higher Education Act” (RSA, 1997), which provides for quality assurance and management functions under a Higher Education Quality Committee (HEQC), established as a standing committee of the Council on Higher Education (CHE). In terms of the Higher Education Act of 1997, the CHE will apply for accreditation as an education and training sub-system sector ETQA.

It is envisaged that the General and Education Training Band (GETB) and the Further Education and Training Band (FETB) will, similarly, have one ETQA for both bands formed by the Department of Education (DoE).

In respect of **economic sector ETQAs**, the dominant model that has emerged is various ETQAs which may cover all the levels on the NQF for different professional or occupational

7 “‘Professional body’ means a statutory body registered as such in terms of the legislation applicable to such bodies, or a voluntary body performing the functions contemplated in the legislation for such bodies but not registered as such” (RSA, 1998a).

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learning pathways. The Skills Development Act will establish 25 Sector Education and Training Authorities (SETAs), which are registered with the Department of Labour and function as ETQAs for specific economic sectors. According to the emerging model, SETAs are one of two kinds of economic sector bodies, which may apply for accreditation.

The other kind of economic sector bodies which may apply for accreditation are professional bodies⁷ (both statutory and voluntary) established under various Acts and pieces of legislation that have accreditation and quality assurance responsibilities. Such professional bodies may apply for accreditation as economic sector ETQAs for standards and qualifications at particular levels related to the particular profession. Examples of such bodies include the Engineering Council of South Africa (ECSA), the Pharmacy Council, the South African Institute for Chartered Accountants, the South African Nursing Council, and the like.

In respect of **social sector ETQAs**, the foreseen model is similar to that for economic sector ETQAs. It is foreseen that ETQAs in various social areas could be accredited for standards and qualifications relevant to the social sector and not catered for elsewhere.

Terms and definitions

The following terms and definitions have been drawn from the SAQA Regulations for NSBs and ETQAs. Where necessary other national education and training documents have been consulted for definitions to assist users of the *Criteria and Guidelines for Providers*

accreditation	means the certification, usually for a particular period of time, of a person, a body or an institution as having the capacity to fulfil a particular function in the quality assurance system set up by the South African Qualifications Authority in terms of the Act;
Act	means the South African Qualifications Authority Act, 1995 (Act No. 58 of 1995);
applied competence	means the ability to put into practice in the relevant context the learning outcomes acquired in obtaining a qualification;
assessor	means the person who is registered by the relevant Education and Training Quality Assurance Body in accordance with criteria established for this purpose by a Standards Generating Body to measure the achievement of specified National Qualifications Framework standards or qualifications, and “constituent assessor” has a corresponding meaning;
conditional registration	means the registration of a private higher education institution as specified in the Higher Education Act, 1997 (No. 101 of 1997);
constituent	means belonging to the defined or delegated constituency of an organisation or body referred to in these regulations;
core learning	means that compulsory learning required in situations contextually relevant to the particular qualifications, and “core” has a corresponding meaning;
credit	means that value assigned by the Authority to ten (10) notional hours of learning;
critical outcomes	means those generic outcomes which inform all teaching and learning, and ‘critical cross-field education and training outcomes’ has a corresponding meaning;
Education and Training Quality Assurance Body	means a body accredited in terms of section 5(1)(a)(ii) of the Act, responsible for monitoring and auditing achievements in terms of national standards or qualifications, and to which specific functions relating to the monitoring and auditing of national standards or qualifications have been assigned in terms of section 5(1)(b)(i) of the Act;
elective learning	means a selection of additional credits at the level of the National Qualifications Framework specified, from which a choice may be made to ensure that the purpose of the qualification is achieved, and ‘elective’ has a corresponding meaning;
ETD practitioner	Education, Training and Development Practitioner, is a term used in this document to include the whole spectrum of educators and trainers: teachers, trainers, facilitators, tutors, markers, lecturers, development officers, mentors and the like;

Terms and definitions

- exit level outcomes** means the outcomes to be achieved by a qualifying learner at the point at which he or she leaves the programme leading to a qualification;
- field** means a particular area of learning used as an organising mechanism for the National Qualifications Framework;
- fundamental learning** means that learning which forms the grounding or basis needed to undertake the education, training or further learning required in the obtaining of a qualification and ‘fundamental’ has a corresponding meaning;
- integrated assessment** means that form of assessment which permits the learner to demonstrate applied competence and which uses a range of formative and summative assessment methods;
- learning programme** means the combination of courses, modules or units of learning (learning materials and methodology) by which learners can achieve the learning outcomes for a qualification;
- moderation** means the process which ensures that assessment of the outcomes described in National Qualifications Framework standards or qualifications is fair, valid and reliable;
- moderating body** means a body specifically appointed by the Authority for the purpose of moderation;
- National Standards Body** means a body registered in terms of section 5(1)(a)(ii) of the Act, responsible for establishing education and training standards or qualifications, and to which specific functions relating to the registration of national standards or qualifications have been assigned in terms of section 5(1)(b)(i) of the Act;
- notional hours of learning** means the learning time that it is conceived it would take an average learner to meet the outcomes defined, and includes concepts such as contact time, time spent in structured learning in the workplace and individual learning;
- outcomes** means the contextually demonstrated end-products of the learning process;
- primary focus** means that activity or objective within the sector upon which an organization or body concentrates its efforts;
- professional body** means a statutory body registered as such in terms of the legislation applicable to such bodies, or a voluntary body performing the functions contemplated in the legislation for such bodies but not registered as such;
- provider** means a body which delivers learning programmes which culminate in specified National Qualifications Framework standards or qualifications and manages the assessment thereof;
- qualifying learner** means a learner who has obtained a qualification;
- quality assurance** means the process of ensuring that the degree of excellence specified is achieved;
- quality audit** means the process of examining the indicators which show the degree of excellence achieved;
- quality management system** means the combination of processes used to ensure that the degree of excellence specified is achieved;
- recognition of prior learning** means the comparison of the previous learning and experience of a learner howsoever obtained against the learning outcomes required for

a specified qualification, and the acceptance for purposes of qualification of that which meets the requirements;

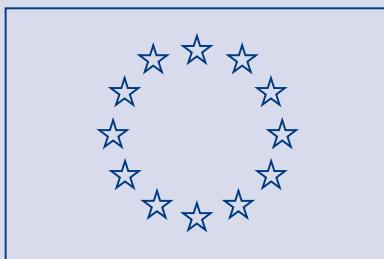
registered standards means standards or qualifications registered on the National Qualifications Framework;

sector means a defined portion of social, commercial or educational activities used to prescribe the boundaries of an Education and Training Quality Assurance Body;

specific outcomes means contextually demonstrated knowledge, skills and values which support one or more critical outcomes;

specialised learning means that specialised theoretical knowledge which underpins application in the area of specialisation and “specialisation” has a corresponding meaning;

Standard Generating Body means a body registered in terms of section 5(1)(a)(ii) of the SAQA Act, responsible for establishing education and training standards or qualifications, and to which specific functions relating to the establishing of national standards and/or qualifications have been assigned in terms of section 5(1)(b)(i) of SAQA the Act



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