



31 May 2016

To: The Commission of Inquiry into Higher Education and Training
FeesHET@justice.gov.za

Re: Comments in terms of the Feasibility Study on making Higher Education Fee-Free

Dear Sirs/Madams,

Thank you for offering us the opportunity to make a contribution towards the inquiry. We are one of the independent South African institutions offering Higher Education programmes, fully accredited and registered with the Department of Higher Education and Training.

In the light of the question whether Higher Education could be made fee-free, we would, in principle, welcome it if suitable applicants could find their way into Higher Education without being limited by financial constraints.

However, we would like to alert the Commission that creating free Higher Education would not be a fair solution if free education would only apply to studying at public institutions. Supported by the country's Constitution, there is a fundamental right for institutions to offer independent education, and for students to enrol for it, as long as regulations in terms of accreditation are met. For this fundamental right to be practised, however, there needs to remain a reasonable balance of expenditure for those involved. Free public education and cost-based expenses for independent education we would regard as unfair competition.

Already in the current situation, independent providers of education are challenged by the difference in circumstances between the highly subsidized public institutions and working without any such financial support. Depending solely on the income of tuition fees, while keeping these fees affordable, in comparison with studying at public institutions, is already a tight balance.

Should only public education become free or much cheaper, then independent institutions as well as their students would have to cope with an unrealistic and unfair financial difference. Students enrol at independent institutions for different reasons, be it because of religion, because of specific qualities or approaches found in these institutions, or because of programmes unavailable at public institutions. Many students do so with great difficulty. In our case the large majority of students go through strenuous financial times due to their studies, and only a small percentage of students seem to be able to afford their studies easily.

We would like to make a strong plea that – if public education becomes free or much cheaper – the registered independent providers be included into the equation. We have the following options in mind:

- that subsidies be made available for registered independent institutions, so that these institutions can continue exercising their constitutional right without unfair competition

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- that a system of bursaries be created, supporting low-income students at registered independent institutions
- that education fees become tax deductible, thus avoiding that higher-income students (or their families) pay twice: once through their taxes, supporting public education, and again through paying for their independent education

Although currently the focus of the inquiry is merely on Higher Education, we regard the above thoughts as applicable to the country's education in general. We believe that South Africa benefits significantly from the independent educational sector, in all levels of schooling, as the sector often produces graduates with remarkable levels of knowledge, skills, motivation and initiative.

At the time of this inquiry we ask the Commission to recommend that the financial injustice that is currently in place be repaired rather than augmented as part of the developments in terms of free education.

We wish the Commission well in their task.

Yours sincerely,



Willem van der Velden
Academic Head