

23rd June 2016

Attention: Judge Jonather HeHer
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cc: Ms Jana van Wyk
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Dear Judge Heher

RE: CPUT's submission to the Commission of enquiry into Higher Education and Training (The Fees Commission).

Submitted by: Dr A P Nevhotalu, Vice Chancellor of Cape Peninsula University of Technology (CPUT) on behalf of the university.

Task Team: Dr AP Nevhotalu; Dr C Nhalpo; Prof D Gihwala; Prof O Fatoki; Prof T Mda; Prof M Sheldon, Ms C Motale; Ms M Geduld-Jeftha; Prof S Pather; Mr W Lotter; Ms L Airey (convenor)

The Cape Peninsula University of Technology, hereafter referred to as CPUT, would like to take this opportunity to respond to the call from the Commission for discussion on the feasibility of a fee free higher education sector.

This submission will commence with the principles and assumptions which underpin the suggestions presented in the summary. These will be followed by an overview of relevant legislation and some statistics relevant to the current context of the higher education sector. The submission will conclude with a broad proposal for funding considerations.

1 Principles and comment

CPUT considers the following principles to underpin the discussion and the proposals, submitted by CPUT to the Commission for consideration.

1. Higher education is key to the knowledge economy and for the society at large. It is thus a requirement to participate in the global economy and provide economically for its citizens. It is also key in that it is the engine of knowledge production, without which the SA community and humanity will stagnate.
2. Higher education is both a public and a private good (societal, individual and business) with all sectors expressing expectations, making demands and receiving goods and services. Therefore, the state, private individuals private business and society in general, all benefit and must therefore make a contribution to the sustainability of providing quality higher education. CPUT also considers that there needs to be benefit for the higher education system as well.

3. The current higher education context is considered uneven and unequal. Within the higher education sector itself it is necessary to recognise that different universities were subjected to different equity and redress tensions, with some universities benefiting more than others. The current disparities in the higher education sector can no longer be ignored. The inequality perpetuates the notion that the traditional universities will continue to advance whilst the other universities descend to mediocrity. We consider that an argument can be made for an intervention to balance the inherent inequality of the forces experienced by South African universities. For example, factors such as the demographic of the student cohort, needs to be considered in the provision of funding, as this factors into the additional costs borne by some universities in providing the support required for student success. Usually these universities also have the lower fees basis.

It is considered that the state must shoulder the State responsibilities', as well as providing for redress at both the individual level and within the higher education sector. It is suggested in the submission that this will require normal subsidy considerations for sustaining the system, directed mechanisms to address redress and bring about equity, as well as additional drivers for promoting access for disadvantaged individuals. The State must shoulder the financial burden of redress in order to address the historical legacies of universities through the implementation of a mechanism such as a Redress Fund, or alternately, by adaptation of the block grants.

4. Equally, there is a need to consider equity and redress in the different contexts applicable to each group of beneficiaries associated with higher education. The needs and contributions of each group should be acknowledged and factored into the proposed funding model.
5. The provision of quality education consisting of the fundamentals promoted by the National Development Plan (2014), such as scholarship, knowledge creation and application, the setting of norms and standards, curriculum determination, in a context of a strong science and technology innovation system, social mobility and a system that promotes social justice, equity and democracy, requires support. To make progress with these aims, within the rapidly changing and instable societal context that currently faces the higher education institutions, the sector needs to be suitably and sustainably funded.

All parties have an equal responsibility to provide for sustainable, quality higher education, whether through the governance role associated with the State, the preparatory role associated with the basic education sector, the individual role and responsibilities associated with successful graduates, the scholastic and standards setting role provided for by higher education institutions, or the financial and partnership role associated with industry and business. All parties have the responsibility to work in partnership with each other, to acknowledge their responsibilities and to act in good faith.

2 Assumptions

In the preparation of this submission the following assumptions hold, namely:

1. To sustain a fee free context, alternate mechanisms of funding will be required. It is assumed that if the alternate mechanisms consist of a graduate tax, or a loan agreement this will be administered centrally by the State, in the same manner as NSFAS is now. The funds raised through this might therefore not be available to individual universities to offset the loss in fees.
2. The current attitude amongst students now appears to be one of entitlement and expression of this has resulted in extensive destruction to universities. It is assumed that it will be possible to change this outlook in the future to one of constructive partnership and nation building.

3. The risks associated with a free fee structure are considered high. While the model is followed in other countries, there is sufficient evidence that shows it is difficult to sustain. Nigeria is an example of a fee free system which struggles from underfunding and lack of competitive infrastructure.

It is also considered that not paying for a service has a psychological impact on society with respect to the value of the service provided, which in turn affects the sustainability of that service.

3 Legislative frameworks

CPUT's submissions on funding considerations in the Higher Education sector is underpinned by the preamble of the South African Constitution, in particular, " *to heal the divisions of the past and establish a society based on democratic values, social justice and fundamental human rights*" (1996:1). The preamble also enshrines the need to " *improve the quality of life of all citizens and free the potential of each person*" – a founding provision underpinned by the need to provide citizens with relevant education and lifelong learning. The rights regarding education are further embedded in the Bill of Rights in chapter 2 section 29(1b) of the Constitution, namely, that:

"everyone has the right to further education, which the state, through reasonable measures, must make progressively available and accessible".

The CHE founding document (2001: 1) embeds the role of higher education as one of , " *facilitating social justice through participation opportunities in higher education for formally disadvantaged constituencies*" and, " *to deliver knowledge resources and services as well as high level skills and competencies for social and economic development*" which supports the Constitution and Bill of Rights as well as the National Commission of Higher Education, NCHE (1996), Two of the objectives provided for in the SAQA Act (1995) and the National Qualifications Framework (NQF) are to:

(d) accelerate the redress of past unfair discrimination in education, training and employment opportunities; and thereby

(e) contribute to the full personal development of each learner and the social and economic development of the nation at large."

The Higher Education Act 101 (1997:1) commits to admirable principles in its preamble, of which CPUT would like to highlight the commitment to:

- *REDRESS past discrimination and ensure representivity and equal access;*
- *PROVIDE optimal opportunities for learning and the creation of knowledge;*
- *RESPECT and encourage democracy, academic freedom, freedom of speech and expression, creativity, scholarship and research;*
- *PURSUE excellence, promote the full realisation of the potential of every student and employee, tolerance of ideas and appreciation of diversity;*
- *RESPOND to the needs of the Republic and of the communities served by the institutions;*
- *CONTRIBUTE to the advancement of all forms of knowledge and scholarship, in keeping with international standards of academic quality;*

Common to this national legislation is that South African citizens have a right to quality education. In addition, the SA Constitution, SAQA ACT, HE ACT, CHE Founding Framework all promote the need for increased access and redress. The latest call for submissions to the High Level Panel, Committee 1, on the triple challenges of inequality, poverty and unemployment, identify quality education as one of the five key

aspects underpinning the tripe challenge. This signals clearly the increased commitment that will be required from the higher education sector.

Within the legislative framework, the CPUT submission takes into account the role ascribed to higher education, as one of knowledge creation and transfer, an accelerator of redress and a promoter of individual, social and economic development. As a point of departure Inherent in these expectations, is the responsibility that resides with the state to provide suitable resources to manifest these roles.

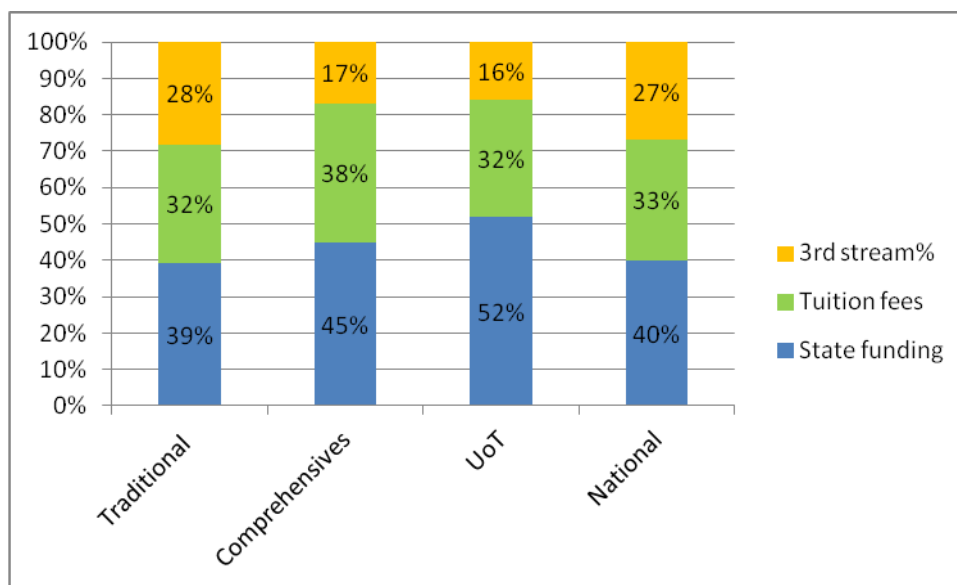
4 Supporting context and statistics

4.1 Funding context and current tensions

It is necessary to consider the current higher education sector and acknowledge the inherent financial tensions that exist. The total funding base in real terms for the South African higher education sector was R15 088 962 633 in 2013/2014 which amounted to 2.40% of GDP and 0.75% of state budget (Vital stats, 2015: 91). This has remained relatively constant over the past three years and represents a 0.09% increase in real funds since 2008/2009. This relatively negligent increase does not offset the vast increase in student numbers and the emerging resource tensions.

Of further relevance to the CPUT proposal is the funding sources per university type as depicted in Fig.1.

Fig 1. Proportion of institutional funding per source and institutional type from 2008/2009 to 2013/2014 (source: Vital stats, 2015)



Of the three major funding sources, the figures indicate that UoTs are more dependent on state funding and tuition fees than the other university types, in particular, traditional universities.

Part of the State funding consists of the research output. The figures for research output from UoTs vary from 0.09 units to 0, 19 units. In contrast, the research subsidy output of traditional universities varies from 1.18 units to 1.47 units (Vital stats, 2015). Traditional universities therefore receive approximately 10 -20 times more funding for research than UoTs.

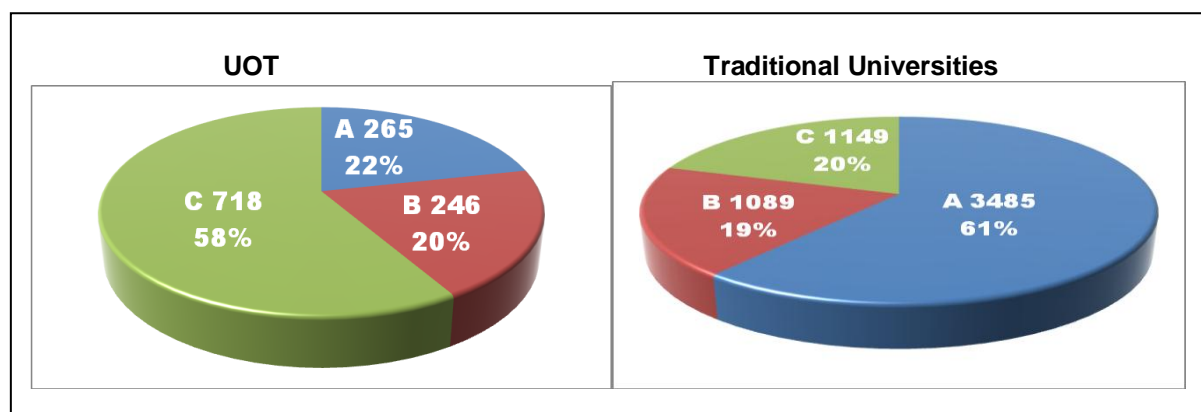
Not only have the traditional universities emerged from the merger scenario relatively unscathed, they are more affluent, with a flexible income base allowing them to perpetuate the existing, inherent inequalities in the higher education system. Coming from a relatively low research and fees basis, with increased

expenditure on Work Integrated Learning, the need for a strong technology base, building research and innovation and not yet receiving sufficient funding for redress and merger issues, the tensions created on UoTs to address the principles of massification, redress and equity is evident.

The resource tension is further exacerbated with the introduction of the HEQSF aligned qualifications. The introduction of these qualifications has affected the UoT sector far more than the traditional university sector (Fig. 2). Category A qualifications made up 61% of the CHE applications. These qualifications mainly required a name change and their implementation should have little impact on additional resourcing requirements.

However, the implementation of the Category B and C qualifications do have additional resource implications and as can be seen these qualifications make up 80% of the qualifications for the UoT sector. In the traditional universities, they comprise 39% of the qualifications. Current experience in the UoT sector is indicating that the introduction of the Category B qualifications alone, will required increased funding by UoTs for approximately the next five years. Funding requirements will be intensified when the Category C qualifications are introduced. The impact on resourcing in the higher education sector due to the introduction of the HEQF needs to be considered and acknowledged. It will be necessary to increase fees for the HEQSF aligned qualifications and a fee free scenario in this context is not considered sustainable.

Fig 2 Proportion of HEQSF aligned qualifications (Cat A; Cat B; Cat C) submitted to CHE for approval by UoTs and Traditional universities. Percentages and numbers of qualifications are represented for each category of qualification (Bezuidenhout, T. 2012).



4.2 Student enrolment figures

Increased access, which has resulted in the massification of South African higher education, together with the right for quality education, creates a tension in an educational sector, which was not originally geared to cope with the significant increase in student numbers. Delivering on the rights expressed in the Constitution requires a sustainable source of funding that is sufficient to support student suitably in achieving success, despite the resource tensions created through massification.

In terms of student enrolment, Vital stats (2015) reports the majority of the student population (70% in 2013) consisting of African enrolments with a 42% enrolment of females in 2013. It is interesting to note the majority of student enrolments being between the age of 20-24 with a significant proportion in the 25-35 age bracket. These two categories amounted to over 600 000 students in 2013 and both categories had an increasing trend in enrolment numbers from 2008. Of note is that the greatest graduation rate is in the 20-24 year age group with the 25-35 year age group having a comparatively low graduation rate. This indicates a need for additional intervention and support required in the 25-35 year age group if universities are to

increase student success rates. It is considered that this is also the age group that would benefit most in terms of social upliftment and redress.

It is considered that these trends should be kept in the forefront of discussions regarding fee free education, student taxes, or loans. Students can only fulfill their responsibilities after the completion of their studies and with the lower completion rates in the 25 -35 year group, the decisions on the sustainability of a fee free scenario should be carefully considered.

A further comparison of the demographic composition of student enrollment highlights the commitment that UoTs have to redress and righting the inequalities of the past. Given the unpreparedness of students coming directly from the schooling system, this sector of universities have to provide a resource intensive support platform to help prepare students for the completion of higher education studies and enable them to become productive members of the economy, and of society in general.

This together with the need to focus on technology driven education suitable for developing the competencies required by industry, translates into the need for resource intensive interventions that require suitable resourcing.

4.3 Fee structures

In support of the argument put forward by CPUT, that inequalities are perpetuate across the higher education sector, a comparison of Engineering fees for 2015 and 2016, sourced from the university websites across the university sector is presented for National Diplomas and B. Degrees, in Table 1.

Table 1: Total Fees associated with Engineering qualifications in some South African universities for 2016. (Source: University websites. Acknowledgement: Prof M Sheldon, Ms Nomfundo Ncoko; Ms Karen Buckle;)

Undergraduate Courses	Fees for related ND at other universities 2016							
	Universities of Technology							UJ
Qualification name	CPUT	DUT	CUT	TUT	NMMU	VUT	Average	
ND: Engineering: Chemical	R 57 560					R 58 700	R 58 700	R25160
ND: Engineering: Civil	R 52 500	R 78 800	R 59 870		R 57 150	R 65 500	R 65 330	per year x
ND: Surveying	R 52 230	R 69 540					R 69 540	3 years
ND: Cartography (GISC)	R 47 830							
ND: Clothing Management	R 59 100	R 58 970					R 58 970	
ND: Building	R 48 440	R 46 200	R 57 060				R 51 630	
ND: Engineering: Industrial	R 51 890	R 68 170			R 71 900	R 65 500	R 68 523	
ND: Engineering: Mechanical	R 51 320	R 66 280	R 59 140		R 61 100	R 65 500	R 63 005	
ND: Engineering: Mechanical (Mechatronics)	R 69 470	R 63 250					R 63 250	
Total average cost for three year National Diplomas	R 46 699	R 63 157	R 64 553		R 64 448	R 64 257	R 64 053	R 75480
B. Degrees	Wits	SUN	UJ	UP				
Average costs for 1st year of B. Degrees in Engineering	R 48551	R 45070	R42600	R 40064				

While it is difficult for a direct fee comparison between the National Diplomas with those of the degrees in Engineering, the figures above are still persuasive in illustrating the inherent discrepancy across the universities, which contribute to perpetuating the inequalities across the sector. In this example, the fees for the first year of degrees at universities are equivalent to the total fees charges for the National Diplomas at UoTs, for three years of study.

The fees for postgraduate studies in Engineering are presented in Table 2. These figures represent the fees for the first year of registration for the postgraduate degree.

Table 2: Fees associated with some postgraduate, engineering qualifications at South African universities for 2016. (Source: University websites. Acknowledgement: Prof M Sheldon, Ms Nomfundo Ncoko; Ms Karen Buckle)

Qualification name:	Universities 2015 fees			Average	University of Technologies 2015 fees						Average
	SUN	WITs	UCT		CPUT	DUT	CUT	TUT	NMMU	VUT	
MTech											
MTech: Engineering: Chemical					R 9 980	R 12 590	no MTech	R 15 510	R 15 380	R 12 600	
MTech: Engineering: Civil					R 7 700	R 12 590		R 19 110	R 15 380	R 12 600	
MTech: Construction Management					R 10 370	R 12 590		R 19 080	R 15 380	R 12 600	
MTech: Construction Management											
MTech: Engineering: Electrical					R 9 720	R 12 590		R 19 050	R 15 380	R 12 600	
MTech: Engineering: Electrical (Coursework)											
MTech: Quality					R 13 270			R 17 140	R 15 380		
MTech: Engineering: Mechanical					R 12 940	R 12 590		R 21 430	R 15 380	R 12 600	
MTech: Engineering: Mechanical (coursework)											
Masters degree	R 21989	R 57432	R 25200-26920								
Average fees for first year	R 21 989	R 57432	R 25 845	R35088	R 10 663	R 12 590		R 18 553	R 15 380	R 12 600	R 13957
	Universities 2015 fees				UoT's 2015 fees						
Qual name: DTech	SUN	WITs	UCT		CPUT	DUT	CUT	TUT	NMMU	VUT	
DTech: Engineering: Chemical					R 8 670	R 18 880	no DTech	R 19 540		R 16 800	
DTech: Engineering: Civil					R 10 240	R 18 880		R 24 220		R 16 800	
DTech: Engineering: Electrical					R 12 940	R 18 880		R 24 150	R 15 670	R 16 800	
DTech: Engineering: Mechanical					R 13 370	R 18 880		R 24 160	R 15 670	R 16 800	
Doctoral degree	R20 110	R 23180	R 16520								
Average fee for first year	R 20 110	R 23180	R 16 520	R 19 936	R 11 305	R 18 880		R 23 018	R 15 670	R 16 800	R17134

As illustrated, while the fee situation at the postgraduate level is not as differentiated as that of the undergraduate level, there are still significant differences between the postgraduate fees for the Master's

level of study at the universities represented and those of the UoTs. The average fee for Masters' degrees at UoTs is a third that of the universities included. It is only at the Doctoral level that fees are comparable across the sector.

These figures illustrate the inequalities that exist across the sector with respect to fees. Those universities that already enjoy a privileged position are further facilitated by the flexibility they have through the provision of higher fees. In addition, students accessing these courses are often in a more privileged position and better situated to succeed in their studies. CPUT contends that there is a need to consider the fee situation across the sector and for the State to set a limit for the fees charged for qualifications, as done in Italy and the United Kingdom (Agasisti and Catalano. 2006:251). This could be viewed as constraining the autonomy of universities in setting their own fees, but given that the #FeesMustFall scenario resulted in the Minister freezing fee increases for 2016, it is considered necessary for the discrepancy in fees to be addressed. While this does not promote a fees free scenario, it will mitigate the impact experienced by students due to fee increases and provide for consistency across the sector.

5 Discussion: Broad overview

With increased massification, transformation of the student cohort to address redress and inequity, the need for improved technology, increasing student intervention and support, and reduced State funding; a funding tension has been created in the Higher Education sector, which has been addressed in part, by increasing fees. This context, together with the opportunity provided by the current political dynamics, has manifested in students expressing their voice in the #FeesMustFall, thereby further exacerbating the financial problems that beset universities.

It is with this in mind that CPUT responds to the call from the Commission on comments regarding free fees for students in higher education and a review of possible funding models. This call provides the opportunity to consider funding in universities, not only in relation to the demands on students and universities, but also in terms of the sustainability of both quality education and university operations, as well as righting past inequalities in the sector that are perpetuated through the current funding model and drivers.

CPUT considers that there will be a need for all stakeholders to work together in developing supportive policy frameworks that lead to the unencumbered flow of funds across the sector. The ideal is for this to occur in a timeframe that is realistic and sufficient in real economic terms. Further, it is considered that government and industry have the responsibility to provide suitable financial support and to invest in universities, while universities will need to be willing, and allowed, to be quickly responsive in establishing the necessary educational frameworks and training required to bring about effective national change.

The need for quick responsiveness on behalf of the State, industry and the university sector requires that universities are given more autonomy by the national agencies in curriculum development and training and are effectively, timeously and sustainably resourced to achieve their mandate.

Diversification of funding sources is considered essential, as is the need to maximize the potential value of investment and research in terms of both finance and infrastructure. Public investment in universities is now paramount if South Africa is to continue to address redress and inequality amongst its citizens. It is suggested that the scope for formal partnership between government, industry and the higher education sector should be explored further with the aim of increasing the public sector investment in higher education.

Therefore, partnership with business and industry to maximize this potential is one aspect, which needs to be supported by government, together with the State providing targeted funds and greater flexibility in the governance of universities that allow for increased university autonomy in the sector's area of excellence, namely, training and development. Embedded in the Constitution is that university autonomy goes hand in hand with accountability and universities should be open to evaluating their standards and ensuring that not only are stakeholders are receiving quality education but that students are receiving actual benefit.

In terms of inequalities perpetuated by funding mechanisms across the sector, Chapter 5 of the Higher Education Act 101 of 1997 deals with the allocation of funds by the Minister. Section (1) refers to appropriate measures for redress of past inequalities; section (3b) refers to:

“different conditions in respect of different public higher education institutions, different instructional programmes or different allocations, if there is a reasonable basis for such differentiation.”

Section 3B in the HE Bill introduces the expansion of the powers of the Minister in relation to transformation. There is therefore, a need for clarity on the redress model that will be applicable to existing universities, as well as the national oversight mechanisms that will ensure conformance to goals developed. CPUT views this as an opportunity to review the criteria for the block grants and to incorporate suitable considerations that allow for the establishment of an equal and unified higher education sector.

CPUT contends therefore, that there is a basis to consider a funding model that provides for the differentiation of funding based on past inequalities. Given that the percentage of GDP allocated for higher education over the period 2011 -2013 was relatively constant (Vitalstats, 2015), it is suggested that the funding model should not only consider the eroding financial contribution made by the state over the past five years and increase the allocation accordingly, it should also consider the efforts made by some institutions to provide increased access to historically disadvantaged students. Together with this should be the consideration for those institutions that cater mainly for the financially impoverished and who have a very low fee base. The erosion of the financial grants in real terms indicates that if a fee free scenario were to be considered by the State, universities would require a commensurate increase in the block grants provided by the State. It is therefore considered unlikely and irresponsible by CPUT to suggest that a fee free scenario for higher education can be considered.

Should a fee free scenario emerge as a recommendation from the Commission's considerations, CPUT contents that a criteria system be invoked that ensures, that those students who can pay fees should do so. However, the Commission should be mindful of perpetuating a system of differential fees amongst the student population, as this could be considered unconstitutional.

6 Suggestions for consideration

To provide for equality and address redress matters through the higher education sector CPUT would like to highlight four funding considerations that relate to the fee free scenario.

Firstly, given the reliance of all universities on state funding, it is suggested that the funding provided in the form of the block grant be revised to include consideration in the teaching input for the:

- student enrolment equity
- student income inequalities and past redress for historically disadvantage institutions
- suitable provision for the completion of the mergers
- CESM categories

That the teaching output considers a proportional allocation for:

- Student equity in graduation
- Student income of successful graduates
- Research outputs
- Publication units
- Master's and doctoral graduates

With respect to institutional factors, the grant be more explicit on:

- Institutional size in respect to provisioning for enrolment targets
- Redress for HDIs
- Merger completion

Secondly, that the State intervene in the setting of fees for qualifications and provide for a more equitable fees base across the sector and in resourcing institutions consideration should be given to promoting regional cooperation and identifying areas of specialty. Where possible, consolidation of resources should be a guiding principle to promote efficacy and efficiency amongst higher education. In the Western Cape for example, consideration should be given to whether all four public universities require separate chemistry laboratories or whether institutions could partner and share facilities.

Thirdly, that the State has the responsibility for undertaking a greater role in supporting universities in their partnering with business to increase investment and third stream income. It is considered that increasing dependency on government grants decreases institutional autonomy and that all universities should therefore be supported and encouraged to develop further their research and innovation products and alternate avenues of third stream income. This will require State support in developing partnerships with business and in a change in the organisation of universities to develop towards a business model that partners with private funding agencies. It is acknowledged however, that this will require extensive change in HE structure and organisation and again differential support and resourcing will be required from the State to promote equality across the sector. It is suggested that setting fees for qualifications and decreasing the reliance of the sector on fees to offset the decrease in State funding will be a means of providing redress to the university sector and promoting equality across the sector. State intervention will be required to move all universities towards targets set by the traditional universities, for example, that 28% (Vital stats, 2015) of income is derived from third stream funding, as is the case with traditional universities. This will allow all universities an increasing degree of flexibility in allocating their resources.

This could be promoted through other mechanisms as well, such as considering additional tax by the State for any businesses that partner with historically disadvantaged institutions (HDIs). An alternative concession would be to provide for greater tax relief for HDI institutions.

Finally, CPUT considers that beneficiaries of the education sector should pay for the services received. Individuals as beneficiaries should pay fees. Those who cannot should then be subsidised by the state. Business as a beneficiary of the skills should also contribute directly to the sector and not only through current tax but perhaps an additional education tax. The SETA model is not considered a success and it is suggested that the system be reviewed. It is suggested that the skills levy taxes should be redistributed to include the higher education sector and a more effective means of disbursement should be considered. The perceived benefit that accrues to the nation does not seem to be commensurate with the funds raised through the skills levy.

In conclusion, CPUT therefore considers it necessary to:

- implement a fee-based funding model with national and State consideration in setting fees for individual qualifications
- review of the drivers associated with the block grants to promote institutional equality and redress and to provide for quality of provision in higher education. Factors such as student enrolment equity should be considered and transformation and redress should be built into the grant allocation.
- support increasing partnerships with business to form a business-based model for universities with increased investment portfolios and a reduced tax for businesses that partner with HDIs

- to increase institutional capacity for increasing third stream income and ensure that beneficiaries of the higher education sector contribute accordingly.

In view of the low funding base and the need for sustainability, CPUT does not consider a fee free scenario possible and considers that the State has a responsibility to provide funding according to the rights enshrined in the Constitution and the Higher Education Act 101 of 1997.

CPUT thanks you for the opportunity to provide comment to the Commission.

Yours sincerely

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