DHET Registration Workshop
22nd Feb 2017 – Questions from Providers

ELMI COLLEGE

I have a question with regards to the realignment of international programmes to the NQF. We currently offer Microsoft and CompTIA training and are in the process of applying to MICTSETA so that we comply with the new regulation. Somebody yesterday mentioned that there may be an MOU signed with Microsoft and I just wanted to check whether this was true.

APPETD is not aware of any undertaking/MOU with Microsoft so we recommend continue with MICT SETA accreditation.

CORNERSTONE PERFORMANCE SOLUTIONS

1. In light of the fact that we are using “old” forms, what guarantee do we as providers have that we will be registered correctly? Must we maybe attach a covering letter with reference to the relevant Communique 1 of 2016 to ensure that there is no confusion? DHET is aware of which entities are currently registered, therefore any of these such submissions in the current timeframe Jan to June 2017 will be acknowledged as pertaining to the Communique.

2. Can we get a word format as soon as possible? To try and complete this form manually is just going to be a mess. If we then complete the document in word, how do we submit? To be honest I find their website not very user-friendly. Excel copy supplied.

3. Annexure 12: Sworn declaration on monitoring and evaluation - Not really sure what is required here? NOT APPLICABLE – was a part of the incorrect/old form.

4. Annexure 13: Accreditation report issued to the DoE by Umalusi (I would assume it will in our case be BANKSETA as we are a registered BANKSETA provider). Yet again not sure what is required here? NOT APPLICABLE – was a part of the incorrect/old form.

5. The Regulations which serve as guideline for the completion of the form only goes up to Annexure 11 that is why the last couple of Annexures are a bit unclear and the presenter yesterday also did not seem to know what is required. NOT APPLICABLE – was a part of the incorrect/old form.

6. I might have missed this point, so I apologise if it was explained, but exactly how do they calculate the surety amount? May we use our own Financial Services Provider? I just want to give our Directors all the options. Surety value is based on the financial value of learner enrolment fees. You may use any financial provider, APPETD simply recommends Marsh as they are DHET approved and also do not require capital outlay.
1. General question I forgot to ask, must we supply a bank guaranteed cheque or can we eft the R500.00 registration fee? EFT is allowed, reference must be the name of the college and a hard copy of the EFT proof must be attached to the application documents.

2. Confirmation that as QCTO registered trainers, we have no association with Umalusi and do not require registration with them? Umalusi accreditation would relate to a qualification offered under that framework so if you offer any of the Umalusi qualifications, you still require accreditation through them as this current process is merely registration with DHET as an entity.

3. Confirmation we will have a word version for application. Excel copy supplied.

4. Point 5 - The Fidelity Guarantee, is not on the DHE download I have, and confirmation this is not a requirement. Correct – this is no longer valid. This was replaced by the requirement for Tuition Surety.

5. Confirmation of the legislative statement required on our brochures and material [Regulation 15] This is the statement that shows your registration/accreditation status and is usually included standard as part of a footer/header on all communication items. As example:

   NAME OF INSTITUTION is registered with the Department of Higher Education and Training as a private college under the FET act, 1997 (reg no XXXXXXX). Company registration no: XXXXX.

   If you are currently not registered with DHET, you would need to amend the wording to indicate your accreditation status with the relevant Quality Council or SETA.

In regards to the Registration Form demonstrated:

1. no reference to the fidelity fund As above – no longer valid.

2. The annexures under J have no reference to sworn declarations, neither are their documents as templates available for download as was suggested. NOT APPLICABLE – was a part of the incorrect/old form.

The sworn declarations were noted as [10 to 13]

10 - details of the application
11 - the institution capacity
12 - maintaining standards
13 - sworn declaration of non-discrimination

ADAPTIT IT TRAINING & DEVELOPMENT

1. We, Adapt IT Training & Development, is a division of Adapt IT which is a multi-million rand listed public company, in whose name will the application for registration go to the DHET? Is the surety necessary if we provide our annual results? If Adapt IT Training and Development has a co registration no, it will be in that name. If the T & D co does not have its own registration, but is operating as a “trading as” then the legal name name will be Adapt IT and the trading name will be Adapt IT Training and Development. Yes – surety is a requirement regardless of financial results actual numbers.

2. This question relates to everybody else: What happens if a private training provider has now applied for and taken up the surety, and paid the premium, but the DHET for whatever reason, do not register the private training company? The Surety provider will have a policy regarding cancellation/reimbursement so that will need to be decided between the institution and the surety provider.
1. In your Application form for registration of private providers (FET Colleges) you request private FET Colleges to provide your office with audited financial statements. There are a number of professional accounting bodies in South Africa such as:
   - **SAICA** = South African Institute of Chartered Accountants
   - **SAIPA** = South African Institute of Professional Accountants
   - **IRBA** = The Independent Regulatory Board of Auditors
   - **IIASA** = The Institute of Internal Auditors South Africa
   - **CIMA** = the Chartered Institute of Management Accountants.

   All the above-mentioned bodies cannot audit books except chartered accountants registered with SAICA and IRBA. The SAICA and IRBA accountants and auditors are expensive and unaffordable. Kindly send a list of all professional accounting and bookkeeping bodies that providers can use for their audited financial statements. As above, SAICA and IRBA accredited accountants may audit. This is an accounting industry stipulation, and DHET does not decide which designation of accountant can sign off on audits. Fees would need to be negotiated between the firm and the institution.

   Joint Communique 1 of 2012 requested private providers to voluntarily opt out of DHET registration or remain with Umalusi until your registration expired. May you also eloquently and without ambiguity explain the intention of these options. Why this document was issued to private providers? How did the choice of these options benefit students and the community at large? This is a historical decision that has no current bearing on the registration requirement.

2. In terms of the Companies Act 71 of 2008, a non profit company is not a reporting entity.

   **INCORRECT** - only NPOs are non-reporting, an NPC is. This simply means its financial statements can only be independently reviewed but not audited. The College Act 2006 requires audited financial statements. Which legislation supersedes the other in this case. **Reporting is required.**

   See the current Companies Act for clarity.

3. What causes a delay in issuing diplomas? What are your current intervention strategies to mitigate this problem?

   Diplomas are issued via the HE division, not the FET division, so this query would need to be routed to the HE Assessments Department directly.
QUESTION(S):

Can you please provide me with information for UIF for learners on Learnerships? I find everything, but not the part on UIF. Currently there is no stipulation or regulation that APPETD is aware of in this regard, as Learnerships do not constitute employment as such.

ISIBANI GRADUATE COLLEGE

Contact Person: Mr. Ngwenya  ngwenya@isibaniedu.co.za

1. Is a training institution allowed to start offering their program to the public once accredited by the QCTO/SETA, but before DHET registration? **Yes, of course.**
   a. If yes, how much more allowance in time are their guaranteed to offer the while waiting for DHET registration? **Deadline for application to register is 30 June 2017, and the DHET has until January 2018 to process the application.**
   b. If no, what is the turn-around time/response time the QCTO is committing to complete the process. **N/A – you may offer the course(s).**

GENERAL

1. If provider has different small delivery sites, do they have to register each one?
   The main campus is registered, but the sites of delivery are merely listed.
2. Why is there not a digital copy available? The current copy is not user-friendly. **Excel copy supplied.**
3. How is this entire application submitted? Is there an online portal or must a hard copy be delivered or sent via registered mail? **ONLY hard-copy manual submission is accepted.**
   Documents must be delivered or couriered to DHET for attention: **Private Colleges Directorate.**
   A letter of acknowledgement will be sent to the applying institution and followup will follow from there. APPETD recommends that your application is submitted by 31 MAY 2017 to ensure that you receive submission confirmation within the deadline timeframes.
4. If a provider does not receive payment for the training/tuition, is surety still required? **No, you may apply for exemption as per the Guideline documents.**
5. If a provider does not deliver at own site, but externally at various sites, whose OHS clearance must be submitted? **The OHS document pertaining to the Provider registered address.**