



22 March 2023

SETA QMS

Internship programme description: Excelgrow Group Holdings

Leon Joubert

To: Whom it may concern

Re: Proof of Cat B Internship: Length of programs and stipend paid to individuals on programs: ExcelGrow Group Holdings

The above matter reference to you email dated 10 March 2023 with heading *SANAS Correspondence – Excelgrow Skills program*.

In principle we agree with your notion towards Learnerships as highlighted by the Vertical Verifier and acknowledge the interpretations of the requirements of a Learnership. However, it seems that the interpretations of the Learning Programme matrix are lumped together and approached as a clustered interpretation. Rather than looking at what the Code is implying and clearly direct towards being 3 different approaches to Skills Development it focussed consistently on Learnerships. A broad overview thus potentially mis-interprets CAT B, C and D as it then fails to see each category as singular.

In our view this clustered approach gives precedence towards Learnerships and the requirements thereof. If the Programmes in the Learning Programme Matrix was intended to be viewed and interpreted as clustered it renders the Narrative Description, Delivery mode, learning site and Learning achievement of Internships as Cat B, meaningless and void.

An Internship is not a Learnership. It must therefore be measured as an Internship and not a Learnership.

Learnerships are widely interpreted, understood, and measured by verifiers. However, It seems that no similar clear interpretation and definition for Internships exist resulting in a narrow interpretation of the Learning Programme Matrix resulting in a limited verification array.

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We would humble like to submit our approach to Internship:

The Excelgrow internship learning program is an accredited institutional based, theoretical instruction and workplace practical learning program, with set requirements resulting in the achievement of a certificate issued by the Service SETA. The Internship process is structured and overseen by an Industrial Psychologist. These credit bearing programs are presented by specialist facilitators, formally assessed, and moderated internally and externally and captured as Statements of Results (SOR's) in line with the Credit Accumulation and Transfer (CAT) policy as prescribed by the Skills Development Act. Academic progress is at the pace of the learner taking into considerations factors such as work production requirements, age, and academic history. All learner information, academic progress and competency status is captured on the Service SETA LMIS (Learner Management Information System) and internally on the Excelgrow LMS (Learner Management System).

Internship Approach: Academic support and document evidence:

ExcelGrow is an Industrial Psychological Firm registered with the HPCSA (Health Professions Council of South Africa) under licence of Industrial Psychologist Christo Botha. As MD of Excelgrow he is surrounded by a team of individuals who are professionals in their own like including Hon. Industrial Psychology, B.A Industrial Psychology, B.Com, Bed Psych and LLB graduates. ExcelGrow is furthermore accredited with the Service SETA.

Preamble to the Internships approach:

On the foundation of Industrial Psychology, living and working in the essence of behaviour sciences, our approach to training and development will always be Person Centred. Thus, ensuring emphasis on the person coming to form an

appropriate understanding of their world and themselves. We regard everyone as a “**potentially competent individual**”.

Why Internship?

For many Black South African citizens, the academic landscape is still ridden with obstacles that should be addressed. Education must be accessible to all, for without it, transformation is so much harder to achieve. For many the SETA's have provided access to funded learning as learnerships, but for others, especially those in permanent employment education is still not within reach. From this vantage point ExcelGrow has positioned itself to provide access to high quality, SETA accredited **qualifications for learners in the workplace**. Structured as a Category B Internship these learners are registered for a full qualification and enrolled with the Service SETA with the backing of an Industrial Psychological firm specialising in internships. Qualified facilitators ensures that learners are guided towards achieving this qualification one module at a time.

How is the Internship offered?

By ensuring that the NQF structure is adhere to, learners are placed on a qualification matching their academic level and academic history. This for example, could be a NQF level 1 qualification on which the learner are enrolled and registered on a full qualification matching the academic level of the learner.

For the sake of mutual understanding, we reference the Skills matrix summary below with consideration:

According to the BBBEE Codes, DTi notice 303 of 2019, the BBBEE Skills Matrix refers to various categories of training, each one with its own requirements. See reference Matrix as reference regarding Cat. B and Cat. D training:

We note the following regarding the Categories:

1. Cat. B:

- Outcome: Theoretical knowledge and workplace experience with set requirements resulting in the achievement of qualification issued by an accredited institution of learning
- Seta enrolment and registered National Qualifications – including Certificates, Diplomas, Degrees.
- Differentiated from Cat. A – tertiary education
- Do not require a formal Agreement with Seta
- Typically offered by FET colleges, private colleges, etc.

2. Cat. D: Learnership & Apprenticeships

- Note: Learnerships are National Qualifications that were registered by the Seta with a Learnership Status
- Purpose: To give access to apply for Seta Discretionary Funding as funded by the Skills Development Levies
- Requirement: A Formal Agreement with Seta in order to effectively manage completion of training in order to release and manage flow of funding
- Outcome: Registered Qualification or Certificate
- Typically offered by FET colleges, private colleges, etc.

With the above as our reference, ExcelGrow is offering Cat. B/Internship training and not Learnerships. Learners are enrolled and registered with the Service SETA for the full qualification Business Practice Level 1 or Generic Management Level 4. These qualifications are then presented and structured as an Internship build by the Excelgrow team of Industrial Psychology professionals. For reference and understanding the definition of an internship is *a period of time spent receiving or completing training at a job as a part of becoming qualified to perform such a job* e.g. Management. With the above as context this report will present 3 supporting arguments being:

1. ExcelGrow: Stakeholder and accredited SDP (Skill Development Provider) with the Service SETA: Full Qualification offered.
2. H12 claims, Thrash payments, SETA Stipends and Absorption.
3. Time of completion.

1. **ExcelGrow: Stakeholder and accredited SDP (Skill Development Provider) with the Service SETA: Full Qualification offered.**

ExcelGrow is a stakeholder with the Service SETA and is accredited to present full qualifications – see accreditation letter/report **annexure A**. All ExcelGrow training is presented in line with the Service SETA requirements as prescribed by the said SETA's Quality Management System for the providing of full qualifications and

As a stakeholder, ExcelGrow is audited on regular bases by the Service SETA through external Auditors as part of external moderation. Attached is an audit report dated 15 February 2023(**Annex B**). Note on page 2 that ExcelGrow is reviewed and audited on the full qualifications as indicated by both the Assessors and Moderator mandates. The rest of this particular report indicates the review of completed Unit Standard for this period as part of the mentioned qualifications. Therefore, all learners will be externally Moderated on completion of assessment and internal moderation on completed Unit standards. A full qualification is achieved on the completion of a minimum of 121 credits (roughly 17 Unit Standards). ExcelGrow is mandated to ensure the progress of each learner registered to a full qualification spanning over a longer but reasonable period.

The above-mentioned Audit is based on ExcelGrow's implementation and compliance of the said Quality Management System (QMS) structured as 33 governing policies as prescribed by the Service SETA. These qualifications, presented as Unit Standard/s and structured as an **internship** is governed by the Service SETA's QMS with special reference to the CAT policy (Credit Accumulation and Transfer policy– **Pol 25 Annex C and the National CAT Policy Annexure D**) and is captured in the internal Learner Management System (LMS) and has full bearing towards the registration,

enrolment, and completion of said qualification/s. In doing so the learner/s is enhanced towards recognition of achieved credits while propelling towards the completion of the full qualification with said credits as building block towards the achievement of such a full qualification. Enrolment with the Service SETA LMIS system thus ensures these achievements of learners are captured on the NLRD (National Learners Record Database). Policy 25 thus guides ExcelGrow in ensuring that all accumulated credits (also completed Unit Standards from other training service providers as *Transfers*) are completed and captured as part of a full qualification. Attached (**Annex E**) is a SOR (Statement of results) indicating that the learners were registered to a full qualification. Also, on the SOR is the modules completed and modules to be completed. **In conclusion Excelgrow, as an accredited institute of learning provides theoretical and workplace knowledge with set requirements resulting in the achievement of a certificate issued by the Service SETA.**

2. H12 claims, Thrash payments, SETA Stipends and Absorption.

ExcelGrow does not facilitate any H12 tax rebates on behalf of any client / employers and SARS. These clients/employers are subsequently not eligible for H12 tax rebates.

Furthermore, no thrash payments from the Service SETA is received as the training is not registered as a Learnership with the SETA. This includes the facilitation of stipends paid from the SETA to any learner. Learner contracting is done between the following parties:

Client/ Employer.

ExcelGrow and.

The employed and/or unemployed Learner and/or Learners with Disabilities.

No internship agreements are facilitated by the SETA as the completion of these qualifications are achieved on a part time basis over a reasonable period.

3. Time of completion.

The perception exists that the training is completed in less than 12 months and is thus not a Learnership. Internships

All Internship training is aligned within the requirements set out by the QMS of the Service SETA. All learners are enrolled to the full qualification and is registered for each module. On completion of each module a certificate of completion is issued and on completion of the internal assessment, moderation, and external moderation a SOR (Statement of Result) is issued by the Service Seta. The time for completion of these modules is then structure as a learner-focused program in employment allowing for achievement of a full qualification. Attached is a letter referred to a client with respect to above (**Annex F**). The letter explains the progress of learners (employees) through the completion of a qualification. Also see the Assessment report for the mentioned learners (**Annex G**). Time of completion thus can stretch to 5 years which is in line with other part-time qualification completion rates. Absorption through an Internship is therefore not a viable option within a 12month period.

Excelgrow submits the above for consideration as towards training offered as a **Cat.B/Internship qualification** on the BBBEE Skills Matrix, and not a Learnership or Apprenticeship (Cat. D) as well as for an understanding on 3-month non-standard contracting and subsequent stipends paid.

Conclusionary summary:

Exclegrow is accredited for the presentation of full qualifications as a institution of learning.

The Services SETA ensures regular auditory function on the Excelgrow QMS as external moderation.

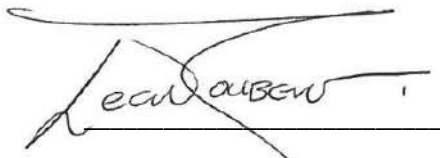
Policy 25 of the mentioned Service SETA QMS makes provision for the accumulation of credits towards the completion of a full qualification thus resulting in the completion of a qualification over a longer period of time.

ExcelGrow does not facilitate any receipt of payments made by the SETA on the behalf of any client/employer and does not facilitate any H12 rebates on the basis a SETA registered Learnership agreement.

The time period of completion is in excess of 12 months, neither can Internship programs be utilised for absorption.

Current qualifications offered is in line with the NQF and can ensure PIVOTAL Credit bearing programs.

Humbly submitted.



Leon Joubert

SETA QMS