

POLICY ANALYSIS AS “TEXT” IN HIGHER EDUCATION: CHALLENGING SOUTH AFRICA’S “USE OF OFFICIAL LANGUAGES ACT”: A CASE-BASED APPROACH

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ABSTRACT

Policy science literature demonstrates that deeper insight into notions of the policy process, such as of policy formulation and policy-making, can be drawn from policy analysis. Some scholars have consequently paid serious attention to policy analysis. In this article, definitions of policy offered by scholars in the field of policy science are deliberated. Thereafter, the article engages with policy analysis from the perspective of policy text. This article employs a case study to scrutinise the Use of Official Languages Act 12 of 2012, particularly the South African Qualification Authority’s language policy development and formulation process as a unit of analysis. From a conceptual and analytical perspective, the article draws on the notion of presupposition as a viable tool for analysing policy text. Furthermore, a textual cycle is proposed, and an account of pertinent research questions is provided. Finally, the article highlights some implications for transformation in higher education pertaining to policy text.

Key words: policy analysis, policy text, presuppositions, South African Qualification Authority (SAQA) Language Policy, Use of Official Languages Act 12 of 2012.

INTRODUCTION

The Preamble of the South African Constitution of the Republic of South Africa (1996) (Act 108 of 1996) outlines a fundamental “vision statement” which is useful and noteworthy for the discussion:

“We, the people of South Africa,

Recognise the injustices of our past;

Honour those who suffered for justice and freedom in our land; ...

We therefore, through our freely elected representatives, adopt this Constitution as the supreme law of the Republic so as to –

Heal the divisions of the past and establish a society based on democratic values, social justice and fundamental human rights;”

This “vision statement” is not only fundamental but interesting for the purpose of this article on two counts. Firstly, it indelibly depicts and affirms our country’s freedom and independence. It also represents the 1994 transition to our “new world”, the new dispensation in which South Africa and her people broke the shackles of apartheid, entering a new democratic era to ensure that all ugly social ills of the past would never recur. The “vision statement” also signifies that we will strive to remain united in our diversity as a country and as a nation. Secondly, this “vision statement” necessitated a new transformation agenda within which major public policy formulation initiatives throughout government should take centre stage. This meant a new administration and new administrative institutions. Driven by constitutional reform plus the provisions of the Constitution, the policy formulation and policy-making process also meant that “... changes affected virtually all the functional fields of government, and consequently redefined the role of policy- and decision-makers” (Roux 2002, 420). Moreover, some of the legislation that have driven the transformation agenda of South Africa are worth mentioning:

- Higher Education Act 101 of 1997 as amended (Higher Education Amended Act of 1999, 2000, 2001, 2002) (Republic of South Africa 1997).
- Language Policy Framework for South African Higher Education, 2001 (Republic of South Africa 2001).
- Use of Official Languages Act, 2012 (Republic of South Africa 2012).

In this article, a prelude dealing somewhat with areas of agreement and disagreement regarding the concept of policy will be presented to set the tone and context for exploring policy analysis from the perspective of “text”. As Ball (1993, 10) points out, “The meaning of policy is taken for granted It is not difficult to find the term policy being used to describe very different ‘things’ at different points in the same study.” Arguably, meaning rests in people not in word, and the concept of policy is no exception. Yanow (2007, 115) expands: “We should ... anticipate that the social reality that we live in a world of multiple meanings or interpretations”. Thus, defining policy remains critical for our purpose.

I adopt a case study approach and focus on the Use of Official Languages Act 12 of 2012 (henceforth “Use of Official Languages Act”), specifically the language policy development and formulation process of The South African Qualification Authority (SAQA) as a unit of analysis. Conceptually and analytically, this article draws on Saarinen (2008a; 2008b) to foreground an analysis of presuppositions in higher education policy. Accordingly, “presuppositions set the assumed common ground which in turn sets the frame of interpretation

of texts" (Saarinen 2008a, 341). This conceptual tool is not only relevant to scrutinise and make explicit those policy text issues which otherwise would not have been made visible, but its relevance in this work is linked to the way it "unveils the veil" of the concealed content of policy documents. Pertinent research questions included in this work comprise the following:

- What stages are set out in the generation of policy text?
- To what extent are policy views represented as generally acceptable public interests in policy documents?
- To what extent is policy analysis accessible to ordinary citizens?

DEFINING POLICY

The literature offers assorted definitions of public policy. Based on my scrutiny of such definitions, I conclude that there is little or no evident objectivity, at least not in the definitions examined in this work. My view on this is echoed by Hill and Hupe (2009, 5) who point out that "Policy is subjectively defined." Hanekom (1987, 7) likewise observes: "Public policy is, therefore, a formally articulated goal that the legislator intends pursuing with society or with a societal group". That a legislator is entrusted with the responsibility of pursuing the goals and needs of a societal group clearly indicates that the stated intent is bound to be influenced by personal views and interests; and such influences are likely to contribute to the non-objective, or subjective, nature of public policy. Perhaps one may also submit that the range of influences that contribute to the real definitional makeup of public policy, besides legislators' personal views, may include "technological developments, population increase and effects of globalisation, public needs and aspirations, and party political dynamics" (Roux 2002, 425).

Fox and Meyer (1995, 107) define public policy as "authoritative statements made by legitimate public institutions about the way in which they propose to deal with policy problems". Dye (2017, 1) offers an apparently simple definition of public policy; and his justification for its simplicity is convincing: "Public policy is whatever governments choose to do or not to do". He avoids elaborate definitions of public policy because such definitions may convey the same meaning; and he validly states that assumptions guide us when a government elects to embark on a course of action that is goal-oriented, objectively driven and purposeful. Nevertheless, observation and experience reveal that, eventually, it remains government's decision to choose "to do or not to do": "Realistically, our notion of public policy must include *all actions* of government, and not what government or officials say they are going to do" (Dye 2017, 333). Codd (1988, 235) adds another interesting dimension to the debate:

“Policy here is taken to be any course of action (or inaction) relating to the selection of goals, the definition of values or the allocation of resources. Fundamentally, the policy is about the exercise of political power and the language that is used to legitimate that process.”

Although these respective definitions do not appear exhaustive, they contribute to our narrow understanding of the notation of public policy. For example, the view that policy definitions are non-objective (or subjective) draws our attention to the fact that policy is directed and shaped by a multiplicity of factors, structures and actors. As Roux (2002, 425) argues, “policy should always relate to current issues in society It should constantly be adapted to match the impact of environmental variables and influencing factors.” Furthermore, we are also made to understand that policy is goal-directed, driven not only by “authoritative ... legitimate public institutions” (cf. Roux 2002), or government, to be precise, but by societal groups as major stakeholders in the policy agenda. We are also cautioned about our narrow view of policy being a government-only driven affair which may, through its activities, prove to be hypocritical and inconsistent when it comes to implementing policy decisions. As Jenkins (1978, 16) asserts, “Public policy, therefore, must be considered to be much more than simply governmental outputs”. If not, arguably, the danger that may result from this position is not only a distortion of reality, but a misrepresentation of the circumstances surrounding the process and, possibly, the effects associated with public policy.

Through these definitions, we are also enlightened that the allocation of resources determines whether the policy is implementable; and that power relations remain a hallmark of the policy agenda. Apart from demystifying and defining whose values, we are also informed of the possibility of action (or failure to act) or of delivering (or not delivering) on a policy decision. Of note, and equally fundamental to policy, of which we are also made aware, is the language being used in the policy document (a primary concern of this article), the way it is used and the reasons behind its use. As Codd (1988, 235) relates, “Such texts contain divergent meanings, contradictions and structured omissions so that different effects are produced on different readers”. This issue will be discussed further on.

CONCEPTUAL FRAMEWORK

Presupposition offers great possibilities in analysing policy documents. This conceptual and analytical tool has been tested at various points and on an array of policy documents. As a proponent of this analytical tool, Saarinen (2008a, 342) considers these:

- a) “Presupposition as new information;

- b) Presupposition as persuasion; and
- c) Presupposition as ideological."

In relation to *presupposition as information*, she expatiates:

"In policy documents, as in any form of communication, a lot is necessarily presupposed. Not every bit of background information can be brought into the situation Thus, presupposition is generally understood to mean the explicit and implicit background knowledge that the producer of the text offers to the reader as the joint starting point for communication."

If I claim that presupposing something is tantamount to making face value judgements, that is, "To presuppose something is to take it for granted" (Saarinen 2008a, 342), then meaning may be misconstrued; and it becomes more complex if presented information is in a language with which the readership is not comfortable. Expressively put, "The writer can, in fact, never be sure whether his or her assumptions are already shared by the reader" (Saarinen 2008a, 343).

Presupposition as persuasion

As persuasion and policy text belong to the same discourse, they are mutually inclusive. Persuasion is a hallmark of policy text. If we perceive persuasion as, "... a conscious interactive process that contains specific characteristics, that is, intent and effect in which a message source attempts to change, shape or reinforce the behaviour of the target" (Ralarala 2010, 106), we could also view persuasion and argument as belonging to the same discourse in which justification or reasons purport to gain compliance. If we accept that, as echoed by Saarinen (2008a, 344), "... persuasion is the property of the texts to represent and construe competing views of the world as common sense and self-evident", then we may accept Sbisu's (1999, 492) convincing argument that, "when what is presupposed has to do with values, social norms or ideals, or with perspectives on facts which are proper to a specific social agent, then informative presuppositions seem to serve persuasive aims". Using presuppositions analytically to understand presented assumptions or information in policy texts carries with it a persuasive function, so making visible and explicit such assumptions (Saarinen, 2008a; 2008b).

Presupposition as ideological

Saarinen (2008a, 343) points out that "the meaning of what is said explicitly has to rest on what is assumed implicitly". Consequently, presuppositions "... may hide value assumptions and ideological standpoints". Furthermore, their relevance in this regard is embedded in their suitability "... for transmitting a kind of content which may be called ideological: assumptions, not necessarily conscious but liable to be brought to consciousness, about how our human world

is and how it should be" (Sbisa 1999, 502). A critical view of ideology as it relates to texts is offered by Fairclough (2004, 9):

"Ideologies are representations of aspects of the world which can be shown to contribute to establishing, maintaining and changing social relations of power, domination and exploitation I am suggesting that textual analysis needs to be framed in this respect in social analysis which can consider bodies of texts in terms of their effects on power relations."

From this perspective, it is most likely that policy actors leverage on their given power to present a particular view of the policy concept to advance the position of the powers that prevail. Language and text are used purposefully "to present a favourable representation of the world" (Saarinen 2008a, 344).

LITERATURE

In the literature on higher education, there seems to be little regarding policy analysis that delves into policy as text in the South African higher education or in the language policy contexts. However, policy analysis literature is fairly well-known to scholars elsewhere (i.e., UK, Finland USA), although policy analysis developments focusing on text have not been a major concern. Drawing on Maguire and Ball (1994), Taylor (1997, 24) shares a similar view: "... policy studies appear to be methodologically unsophisticated, with issues of language and meaning taken for granted". Saarinen (2008b, 719) elaborates, "While higher education policy research primarily relies on policy documents as data, the uses of textual methods and approaches in that research are strikingly scarce".

Within the South African context, literature has dealt primarily with policy analysis but less with policy as text. Perhaps the closest relates to policy as discourse, which has received some attention (Codd 1988; Ball 1993; Taylor 1997; Gale 1999). Alexander laid significant groundwork for language policy development in higher education through the PRAESA. His persuasive view, particularly on language policy, has been to advance the notion of national unity. Alexander (2006; 2013) viewed language policy as part of and in line with general social policy, whatever the latter's broad aims might be (e.g., nation building or economic development). Thus, any language policy that resists the broader aims of social policy will probably yield undesirable societal outcomes. Alexander's work has been greatly influenced by understandings of "policy as discourse" which, according to Ball (1993, 15), includes the notion that "... policy as discourse may have the effect of distributing voice. So that it does not matter what some people say or think, only certain voices can be heard as meaningful or authoritative."

Though there are traces of text nuances in the notion of "policy as discourse", discourse

is broader. Ball (1993, 14), drawing on Foucault (1974), observes that discourse is “irreducible to language and speech”. Its scope encompasses broader social and cultural structures: notions of knowledge and power; and how power is exercisable by and accessible to only some in society. Such notions will not necessarily receive detailed attention here, as they are not a major concern of this article; however, they overlap with our concerns. To emphasise, I do not intend to suggest that discourse and text are not connected, as they overlap in more ways than one. Fairclough (2004, 3) puts it succinctly: “... text analysis (policy as text) is an essential part of discourse analysis, but discourse analysis (policy as discourse) is not merely the linguistic analysis of texts”. Our concern and discussion focus here is policy analysis in the form of language and “text”. The argument advanced underscores the notion of language and text in policy analysis, rather than focusing on the broader policy as discourse.

On policy analysis as text

Policies are not recognisable and accessible unless presented in written documents. While tangible, Roux (2002, 425) notes:

“... It can be argued that it is not the policy, which can be seen or evaluated, but merely the written word or the document. Contained in the document, therefore, is the formulation, in writing, of the intent of government or the course of action to follow”

Saarinen (2008b, 722) points out that “Language is holistic – texts may be artefacts (such as letters on paper or bytes in a document file), they may describe the state of affairs”. Put differently, Fairclough (2004, 3) notes that “We might say that any actual instance of language in use is text”. Conceived in this way, language and/or text “... does not only describe social processes and structures, but creates and supports them” (Saarinen 2008b, 719). Language and “text” use in policy formulation processes are therefore deliberate and purposeful and, as such, carry fundamental implications regarding interests. The important question is: “Whose interests are being advanced?” In analysing the case, we will address this question.

Codd (1988, 235) considers in detail the notion of policy as text. Policy analysis can take two forms: (a) analysis of policy determination and effects; and (b) analysis of policy content. The latter, which explores “the values, assumptions and ideologies underpinning the policy process”. Codd (1988, 236), is primarily concerned with policy documents – text. These texts can never be perceived as elementary, as they constitute and represent “inherent ideological ambiguities, distortions and absences” (Codd 1988, 246). Codd (1988, 235) elaborates:

“... Policy documents legitimise the power of the state and contribute fundamentally to the

'engineering' of consent. Such texts contain divergent meanings, contradictions and structural omissions, so that different effects are produced on different readers."

Taylor (1997, 26) makes a similar point, arguing that "policy texts represent the outcome of political struggles over meaning". As such, they can also be considered "... textual interventions put into practice Textual interventions can change things significantly" (Ball 1993, 12). Although not self-executing, policy texts not only pose a great influence, but directly bear on policy implementation and on social action.

From these perspectives, we submit that "policy texts are the central points of interaction between the politics of policy production and the politics of policy interpretation" (Gale 1999, 394). Considered in this way, policy text – defined in a broader sense (in Fairclough's terms) – and action are inseparable. Thus, policy proposals, or decisions contributing to the written word and text derived from purposeful discourse and "public engagement", ultimately produce policy documents. Accordingly, "Such discussion has become an acceptable part of what is called 'the democratic processes'" (Codd 1988, 237). It follows that certain "linguistic choices" employed in authoring and developing policy documents not only contribute meaningfully in stimulating the appetite of the multiplicity of readership; their orchestrated, discursive presence is a "political strategy" intended to commit that readership to adopt and embrace a proposed ideological stance which constitutes a final policy. Arguably, subtle persuasion remains a hallmark of resulting policy text. This issue will receive further treatment when analysing the data.

Deliberately using the English language in policy documents directly affects meaning-making for those with limited or no English proficiency, the supposed beneficiaries of policy practices and implementation. South Africans have 11 official languages (provided in Section 6 of the Constitution), with sign language considered the 12th. Since most South Africans speak African languages, the sole use of English exacerbates inaccessibility of policy texts, blocking ordinary citizens' meaningful engagement with those texts. Those citizens are forced to seek critical information through a largely foreign language and, in the process, they tend to be misdirected and misinformed. They may then believe and submit to political deception without any comprehension of the actual contents of these policy document texts that affect them. Codd (1988, 237) shares a somewhat similar view:

"... Policies produced by and for the state are obvious instances in which language serves a political purpose, constructing particular meaning and signs that work to mask social conflict and foster commitment to the notion of a universal public interest. In this way, policy documents produce real social effects through the production and maintenance of consent."

Seemingly, here we could argue that language and text are mutually inclusive. Whilst "Language is widely perceived as transparent", (Saarinen 2008b, 722), such perception errors tend to undermine the centrality and functionality of text in policy. The mechanics of such dependency (mutual inclusivity) remains our centralised (re)source through which we activate our reason, we stimulate our meaning-making process, invoke our belief, and mediate our perception of reality. Sandford (1993, 251) echoes this position: "... our understandings of the world are always mediated through texts, and we need to be attentive to how discursive practices help constitute the partial perspectives we rely on for making sense of the world". Therefore, for ordinary citizens to play a meaningful role and own the policy formulation process as active participants rather than passive recipients, the "linguistic interventions" that are meant to convey policy information and express ideas (and intentions) should predominantly serve people's interests, rather than those of the state.

METHODOLOGY

A single case study design is used. The case concerns the processes as well as the activities surrounding policy formulation relating to SAQA. The Authority's functions include, among others (Republic of South Africa 2016):

- a. (i) "oversee the development of the National Qualifications Framework; and
- (ii) formulate and publish policies and criteria for –
 - aa. the registration of bodies responsible for establishing education and training standards or qualifications; and
 - bbb. the accreditation of bodies responsible for monitoring and auditing achievements in terms of such standards or qualifications."

Initially, offering a brief contextual account of how this policy originated will provide clarity and fairness to the discussion. The Constitution, as outlined in its Preamble in the introduction of this article, is the supreme law of the country. One of its fundamental objectives was (and still is) to deal with the deficits of the past, mainly apartheid and its discriminatory practices, with the view to establishing a new dispensation.

In line with the founding provisions of the Constitution, i.e., Section 6, Language and language rights, discourse remains critical. Hence, Article 6 (4) of the Constitution provides that

"The national government and provincial governments, by legislative and other measures, must regulate and monitor their use of official languages. Without detracting from the provisions of subsection (2), all official languages must enjoy parity of esteem and must be treated equitably."

Based on this provision, the Use of Official Languages Act 12 of 2012 was enacted. Besides its application to national departments, public entities and enterprises, its objects include, amongst others, “the regulation and monitoring of the use of official languages ... for government purposes” (cf. Use of Official Languages Act 12 of 2012). Further objectives included are “to promote good language management by the national government for efficient public service administration and to meet the needs of the public”. Therefore, the enactment of the Act has influenced the introduction and possible enactment of the proposed SAQA Language Policy. Acknowledging the link between these pieces of legislation is very important for two reasons. First, it demonstrates the connection between policy and its contexts (Gale 1999, 398). Second, it helps account for the process of policy formulation, as set out in the South African Languages Bill, “the enactment of texts relies on things like commitment, understanding, capability, resources, practical limitations, cooperation ...” (Republic of South Africa 2011).

During policy formulation, SAQA's research unit coordinated the drafting of the policy, entitled “SAQA Language Policy: Draft for public comment”, a process that led to a call for public comments through the *Government Gazette* (Republic of South Africa 2016). In response to the call, comments were received from relevant interest groups (Ethekeini Municipal Academy; Glasshouse Communication Management; Financial Planning Institute of South Africa; National Institute for the Deaf; and Cape Peninsula University of Technology's Fundani Centre for Higher Education Development). It is not known whether a final document has been released since consideration of these public comments. Analysis of policy as text will therefore be dealt with in this article based on the proposed SAQA Language Policy, within the purview of the Use of Official Languages Act. Precisely, the analysis will focus on the policy document – more often called policy text – developed by SAQA through research and internal consultation processes.

ANALYSIS OF PRESUPPOSITIONS

Presuppositions are often triggered by different linguistic markers (Saarinen 2008a, 346) or “linguistic presupposition inducers”, in Sbisa's (1999, 506) terms. In effect, “everything that has to be presupposed is in fact linguistically manifest, as in definite descriptions ...” (Sbisa 1999, 506). Notably, presuppositions, although apparently explicit in certain contexts, may not be entirely explicit, since “they do not present themselves as explicit claims, as assertions, evaluations or arguments” (Sbisa 1999, 506). Their potential power is recognisable in inducing consent and endorsement in the context of policy text. Conversely, implicitness is another central feature associated with presuppositions in respect of background information that may

be shared by the author for potential benefit to the readership with a view to introduce a common ground. Fairclough (2004, 55–56) provides details of implicitness: “a pervasive property of texts, and a property of considerable social importance”. He further suggests, “All forms of fellowship, community and solidarity depend upon meanings which are shared and can be taken as given, and no form of social communication or interaction is conceivable without some such ‘common ground’.” According to him, implicitness and assumptions belong to the same discourse. In Fairclough’s terms, three main types of assumptions, which are fundamental for an analysis of presuppositions, manifest in the data:

- “Existential assumptions: assumptions about what exists.
- Propositional assumptions: assumptions about what is or can be or will be the case.
- Value assumptions: assumptions about what is good or desirable.”

My analysis of presupposition is foregrounded on selected existential, propositional and value assumptons found in the introductory sections of the policy document that consider the policy purpose. Analysis first concentrates on identifying presuppositions in SAQA’s proposed Language Policy document (Republic of South Africa 2016, 3), and in the common ground constructed. The second part considers persuasive elements of presuppositions as they relate to the value assumptions.

Purpose of proposed SAQA Language Policy

1.1 “The purpose of this Language Policy is to give details of the following:

1.1.1 The use, by SAQA, of English for its day-to-day activities including communicating with the general public;

1.1.2 Communication with individuals who use an indigenous South African language other than English and who are not proficient in English; and”

In 1.1.1, the word “use” incorrectly suggests that English was not previously used in day-to-day communication with the general public before the introduction of the proposed policy. However, English *was* used in this way long before that. Through this implicit presupposition, the reader is led to believe that the policy marks the beginning of a new era of democracy, whereas it entrenches the status quo. The implication of such presupposition is to construct a particular meaning, which Codd (1988, 237) views as a situation “that masks social conflict and fosters commitment to the notion of a universal public interest”.

In 1.1.2., the *change of state* presupposition is triggered by the noun, *communication* (at

the beginning of the point. This is influenced by the constitutional provisions and also induced by the Use of Official Languages Act, plus other pieces of legislation (refer to 1.2.1–1.2.7 of the proposed policy). The statement not only implies change, but that the general public will have access to critical information through a language with which they are comfortable, implying especially previously excluded speakers of indigenous languages. Thus, presenting this information as “new” carries an implicit presupposition as a strategy which enables the proposed policy to be received favourably by the general public.

- 1.3.1 “Promote multilingualism amongst the South African public;
- 1.3.2 Support and grant equal access to information and services to all South Africans regardless of language, race religion, sexual orientation or creed;
- 1.3.3 Eradicate the marginalisation of indigenous South African languages;
- 1.3.4 Foster respect for and respect for language rights (my underlining); and”

All verbs and phrases in 1.3.1–1.3.4 create value assumptions: “Promote multilingualism”, “Support and grant equal access”, “Eradicate the marginalisation” and “Foster respect for language rights”. The understanding conveyed is that, through the context of this proposed policy, notions of inclusivity, access to critical information, equitable use of languages, linguistic rights and all other social justice-related principles, are desirable. In 1.3.3, it is presupposed that the previous system was not favourable, as it was characterised by marginalisation in respect of linguist infrastructure. The presupposition that the new system will eradicate marginalisation is not only a beacon of hope, but triggers approval and public interest regarding policy proposals. Certainly, what is presupposed here, as shared by Sbisa (1999), has everything to do with values; hence, the informative presuppositions serve persuasive aims.

- 1.3.5 “Use language that is accessible to all.”

In 1.3.5, using “accessible to all” to describe language use presupposes that all languages will receive equal usage and status; and so all citizens will be entitled to their linguistic rights. Certainly, such a definite description is equal to a propositional assumption, conveying not only important information but expressing that the policy proposals will translate into reality. This informative presupposition also carries a persuasive element.

- 1.4. “English has been chosen as the language for daily operations at SAQA for the following reasons:

- 1.4.1 The need to have a standardised format and terminology for registered qualifications and part-qualifications and so avoid confusion and misunderstanding on the part of providers of education and training, learners and the general public;
- 1.4.2 The need for employers in the private and the public sectors to fully understand the qualifications held by prospective employees so as to make decisions on their suitability for employment;
- 1.4.3 The language of teaching and learning in most schools, TVET Colleges, universities, and other education and training sites who are users of the products of the National Qualifications Framework (NQF), is English;
- 1.4.4 Most facilitators of education and training are fully competent in English;
- 1.4.5 English is used by the Ministry and the Department of Higher Education and Training in official communications, as do all government departments;
- 1.4.6 The NQF and its information system, the National Learners' Records Database (NLRD), contain information in English that is accessed by interested parties around the world; and;
- 1.4.7 Resource constraints. Reproducing the work of SAQA in other languages in addition to English, for example the NLRD data, minutes and proceedings of meetings, publications, website, policies and certificates and statements of achievement in other languages would require additional human and financial resources as well as time.
- 1.5 Where possible, information on SAQA is translated into other official languages. SAQA has an information manual which is available in all eleven official South African languages on the SAQA website which gives details of the services it offers."

In 1.4, the phrase "English has been chosen ... for the following reasons", is a presupposition meant to advance compliance amongst the interest group and the general public, advancing that using English is justifiable and so should be accepted. This assertion further presupposes that a decision has already been made to adopt a monolingual policy in SAQA's daily operations. The call for public comments is merely paying lip service to the notion of democratic decision-making but is meant to commit the public to embrace the existing status quo.

Also, in 1.4, English as a language of choice is underscored. Not only is it presupposed that the best standardised format and terminology for registered qualifications can only be attributed through use of English, but in 1.4.1 it is presupposed that embracing such a system is imperative to avoid confusion and misunderstanding by providers of education and training, learners and the general public. Arguably, the propositional assumption is that, to avoid confusion and misrepresentation, using other languages in the system must definitely be avoided.

In 1.4.2, a positive connection is made between language (i.e., English) in which a candidate's qualifications are presented and potential employment. This phrase unveils this: "... prospective employees so as to make decisions on their suitability for employment". From this, it appears to be a forgone conclusion (presupposition) that prospective employees' job opportunities hinge on the language in which their qualification information is communicated,

implying that using any other language than English is bound to create confusion and employers may be unable to assess and offer job opportunities to such job-seekers.

In 1.4.3, English is presented as a language that has always been used without any problems: "... language of teaching and learning in most schools, TVET Colleges, universities, and other education and training sites ..., is English." Here, the hegemony of English is emphasised and, as such, the assertion implies that it is an inclusive, standard, acceptable practice that must be sustained.

In 1.4.7, it is existentially presupposed that available resources can only cater for English language-related activities. Any considerations aimed at accessing higher education activities through other languages are portrayed as rather costly and therefore impossible (owing to both human and financial resource constraints). This suggests a lack of commitment on the part of the implementing agent regarding the objects of the Use of Official Languages Act.

In 1.5, the introductory phrase, "Where possible", implicitly suggests that, where it is not possible, citizens' access to critical information in other languages will remain utopian. Thus, while 1.5 begins by suggesting that, as part of the proposed policy, it would be ideal to make such provision (i.e., present this information in other languages), it then immediately implies that fulfilling this immediately will probably not occur.

DISCUSSION

In this article, an attempt has been made to "deconstruct" policy text. Some observations relating to the analysis are noteworthy. Using presuppositions as both conceptual and analytical tool is obviously not only a utility, but it enables the reader to understand that presented assumptions or information, as shared and commonly acceptable in policy texts, have a persuasive function. In addressing the first pertinent research question; and, based on the literature and on the preceding analysis, it is apparent that policy text follows formulae which contribute to its meaningful development. The stages attributed to this form of development comprise: (1) *Policy proposals*: Initial conceptualisation with a plan of action to deal with a problematic situation affecting communities, interest groups or society at large; (2) *Policy wording/text*: Entailment of the content, context and potential action attributed to a policy document; (3) *Policy document*: Physical or tangible artefacts – paper in a document file – which uphold the status of a policy document; (4) *Policy*: The actual legal document which conveys a statement of intent regarding identifiable problems or challenges which seek viable solutions. For me, this is what could be coined as Policy Text Formulae.

In Figure 1, the process phases of policy formulation as text is depicted in the form of rings of an onion.

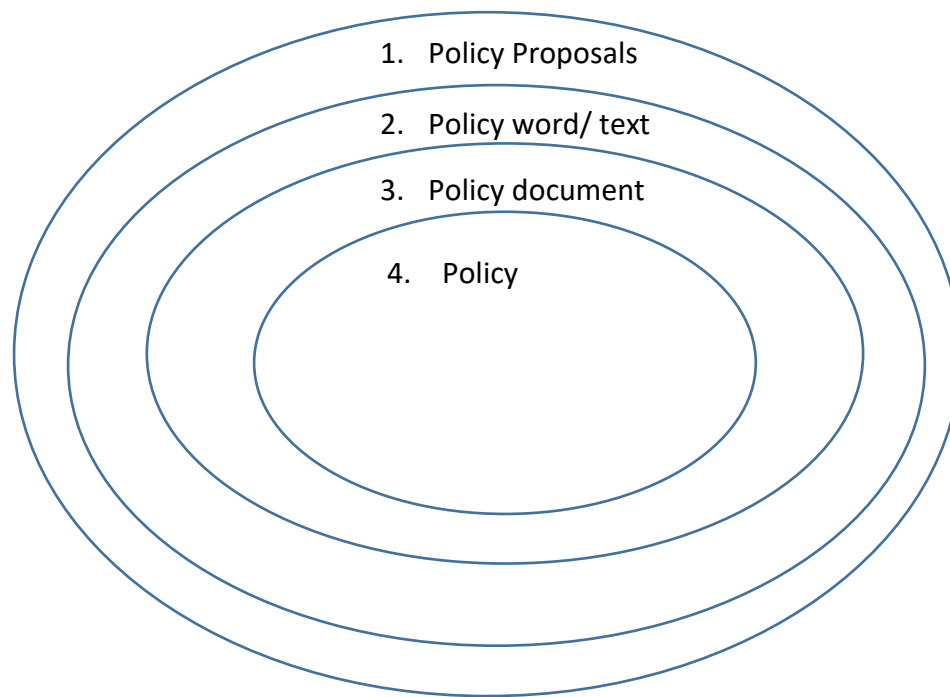


Figure 1: The process of policy as text formulation

Although the above conceptualisation may not be exhaustive, it provides a glimpse of the policy formulation process. Arguably, the same conceptualisation could provide some insights and clues leading to the analysis of policy content, in Codd's (1988) terms. Considering the second research question, policy text evidently constitutes a deliberate linguistic strategy intended to achieve various goals perhaps including but are not limited to these: a) the construction of a certain form of reality and making sense of it; and b) presenting such reality as pervasive and which people embrace. Throughout our analysis, it is apparent that the views and interests of the general public are oftentimes not fully represented or accurately reflected in public comments in the policy documents, but such views are rather co-constructed by policy makers and presented as generally acceptable views that the public holds. This is often a misrepresentation of reality. Regarding the third research question, accessibility of policy document to ordinary citizens remains a critical question. In South Africa, the following official languages are spoken: Sepedi, Sesotho, Setswana, siSwati, Tshivenda, Xitsonga, Afrikaans, English, isiNdebele, isiXhosa and isiZulu (Republic of South Africa 1996, 4). Essentially, a significant percentage of South Africans (almost 70%) speak African languages or have an African language as their mother tongue while only approximately 30 per cent speak either Afrikaans or English or have these as their mother tongue (Ralarala 2012, 59–60). Almost 70 per cent are therefore not conversant in English and Afrikaans, and it is unlikely that this figure

will change dramatically soon (Ralarala 2012, 59–60). The policy formulation process is factually not entirely accessible to all South African citizens owing to limited linguistic proficiency in the policy language(s). During policy processes, how policy documents are formulated, written and designed masks this reality and the result is an attractive-sounding fallacy intended to gain public interest, as with the current proposed SAQA Language Policy. However, this Language Policy's formulation is of critical national interest, so meaningful public engagement remains fundamental. If policy content is not carefully considered, as shown in dealing with the notion of policy text, policy failure is likely to result. Citizens will remain despondent, and this could be a recipe for chaos.

IMPLICATIONS FOR TRANSFORMATION IN HIGHER EDUCATION

Deconstructing policy from the point of view of text carries some notable spin-offs, as well as implications for higher education. Firstly, this approach acknowledges that policy and policy analysis is not inspired by shared meanings but rather by a multiplicity of meanings, hence an "interpretive community" or a "community of meanings", in Yanow's (2007, 115) terms. Indeed, amongst other insights, the current analysis unveils not only areas of textual contradiction and contestation in the policy draft of SAQA's Language Policy, but orientations of power relations which permeate struggles of powerful versus less powerful voices. Arguably, if we take "language" seriously as a data source for policy analysis, its rationality and validity can be tested in other examples of policy analysis in higher education. Secondly, in the last few years, we have been grappling with notions of policy implementation, particularly in higher education. Arguably, this could be as a result of intractable policy controversies dating back to the dawn of democracy; and there seems no clear direction whether such intractability is a result of policy design failures or rests in how policies are framed. These important questions beg further investigation. Nevertheless, undesirable dissatisfaction and confrontations arise when critical voices are excluded, such as those of students (as detected in the current analysis); and other consequences and situations continue to haunt higher education. (For a detailed account, see Mayaba, Ralarala and Angu, 2018). Deconstructing policy as text not only highlights for practitioners the continued existence of an untransformed system of education, but sheds light on possible benefits of inclusivity and meaningful engagement, when taken seriously by policy makers. Addressing shortcomings in policy as a result of its deconstruction is, indeed, democracy in action. Thirdly, policies are obviously not self-executing: they are driven by actors and actors familiar with the policy environment (so their insights remain key). A context-driven policy analysis underpinned by analysis of policy text carries more promise than just generalised ideas in higher education, in that its formulation base is transformative in nature: it

is bound to recognise the value, desires and the contribution of local knowledge (African languages, in this case) and its centrality to the development and education of a given community. Notably, the current analysis of the draft policy reflects its bias towards an English-only policy (against the multilingual societal reality) and the dangers associated with that position. Considered thus, policy text analysis forces us to re-examine Policy Text Formulae (cf. Discussion section above) to reassess policy proposals and other sequential processes, and the extent to which these correspond to implementation and legislative intent.

CONCLUSION

This article has meaningfully engaged with the notion of policy analysis as text. Aside from making passing mention of social processes that may have been entrenched in discourse, that is, “textual residue of policy processes”, in Saarinen’s (2008b, 726) terms, the article recognises the intentional and strategic use of language to create certain perceptions about our social reality. In fact, discussion in the article is foregrounded on a recognition of the confines of linguistic analysis of policy text. This approach has also been essential in understanding the fundamentals surrounding notions of policy formulation and policy-making. In sum, it is therefore fair to assert that the discernibility of policy is not only confined to a written word or to the contents of the document that represents it. Rather, its voice and discursive presentence is bound in actual practices, as well as in the implementation process thereof. For this reason, policy text or wording should not be taken for granted or presupposed, as deep-seated meanings implicit in policy text tend to carry serious implications for the future of higher education in South Africa.

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