



ZAMBIA QUALIFICATIONS AUTHORITY

**REGULATORY IMPACT ASSESSMENT REPORT ON THE REVISION AND INTRODUCTION OF
FEES FOR THE ZAMBIA QUALIFICATIONS AUTHORITY**

MARCH 2025

BACKGROUND AND INTRODUCTION

The Zambia Qualifications Authority is a statutory body established under the repealed Zambia Qualifications Authority Act No. 13 of 2011 and continued in existence by the Zambia Qualifications Act No. 8 of 2024. The Authority is mandated among other things to develop, oversee and maintain the National Qualifications Framework, register qualifications on the National Qualifications Framework and verify local and foreign qualifications.

Act No. 8 of 2024 is supported by Statutory Instrument No. 4 of 2018 which existed under Act No. 13 of 2011 and has continued in existence under Act No. 8 of 2024 by virtue of the Interpretation and General Provisions Act Chapter 2 of the Laws of Zambia. Statutory Instrument No. 4 of 2018 provides among other things fees payable for ZAQA services. The Ministry of Education on the recommendation of the Authority is in the process of re-issuing the above statutory instrument in order to align it to Act No. 8 of 2024.

The functions of the Authority as provided for in Part II Section 5 (1) of the Zambia Qualifications Authority Act No. 8 of 2024 and the are outlined below:

- (a) develop, oversee and maintain a National Qualifications Framework;
- (b) develop and implement policy and criteria, in consultation with the appropriate authorities, for the development, registration and publication of qualifications which shall include the following requirements:
 - (i) the relevant sub-framework shall be identified on any document relating to the registration and publication of a qualification; and
 - (ii) each sub-framework shall have a distinct nomenclature for its qualification type which is appropriate to the relevant sub framework and consistent with international practice
- (c) register a qualification, if that qualification meets the relevant criteria;
- (d) develop policy and criteria in consultation with the appropriate authorities for the recognition of prior learning and credit accumulation and transfer system;
- (e) develop the content of level descriptors for each level of the National Qualifications Framework and agree with the appropriate authorities on the content of the level descriptions;
- (f) publish the agreed level descriptors in the Gazette and ensure that the levels remain current and appropriate;
- (g) ensure that standards and registered qualifications are internationally comparable;
- (h) develop, publish and maintain national occupational standards for occupations in the Republic in consultation with the relevant stakeholders;
- (i) verify a local qualification in consultation with an awarding body;

- (j) verify and evaluate foreign qualifications in consultation with a competent authority in the foreign jurisdiction;
- (k) collaborate with other international institutions or organisations on all matters of mutual interest concerning qualification frameworks;
- (l) establish and maintain a database of learning achievements in the Republic;
- (m) monitor and evaluate compliance of appropriate authorities with the National Qualifications Framework standards;
- (n) inform the appropriate authorities and stakeholders on international practice in the development and management of the National Qualifications Framework;
- (o) conduct assessments on the development and implementation of the National Qualifications Framework, including periodic studies of the impact of the National Qualifications Framework on education, training and employment; and
- (p) advise the Minister on matters relating to the National Qualifications Framework.

The Zambia Qualifications Authority Act 2024, part VI, Section 33 (2) (c) allows the Zambia Qualifications Authority to charge and collect fees for services provided by the Authority. To this effect, Statutory Instrument No. 4 of 2018, First Schedule (Fee Structure) prescribes the following fees:

Table 1: Category of Fees

Description	Fee Unit	Fee in ZMW (0.30)
Accreditation of a Zambian qualification	16,666.67	5,000.00
Renewal of accreditation of a Zambian qualification	16,666.67	5,000.00
Accreditation of a foreign qualification	33,333.33	10,000.00
Renewal of accreditation of a foreign qualification	33,333.33	10,000.00
Validation of a general education qualification (Local)	166.67	50.00
Validation of a Trades and Occupations qualification (Local)	666.67	200.00
Validation of a professional qualification	1,666.67	500.00
Validation of a higher education qualification	1,666.67	500.00
Validation of all foreign qualifications	1,666.67	500.00
Evaluation of qualifications	2,333.33	700.00

From 2018 to date, the Authority has been levying the above fees in order to provide its services of verification and evaluation, and registration of qualifications. However, throughout the period 2018 to date, the Authority has grappled with the problem of not being able to meet its costs of providing some of its services. As a result, the Authority has been unable to implement its mandate fully.

In view of the above, a proposal to revise some of the fees was considered by the Authority. Further, new categories of fees are being introduced following the enactment of the Zambia Qualifications Authority Act, 2024.

Therefore, this regulatory impact assessment is being undertaken pursuant to Section 6 (2) of the Business Regulatory Act No 3 of 2014 which requires public bodies that intend to introduce any policy or proposed law for regulating business activity to perform a regulatory impact assessment, analysing the problem that is being addressed by the policy or proposed law and why Government action is needed to correct the problem.

2. PROBLEM DEFINITION

The Zambia Qualifications Authority is mandated among others to register a qualification, if that qualification meets the relevant criteria; verify a local qualification in consultation with an awarding body and verify and evaluate foreign qualifications in consultation with a competent authority in the foreign jurisdiction.

The Authority remains with notable challenges that affect it from fulfilling its mandate, which among others have been as a result of inadequate staffing levels and high cost of verification of foreign qualifications, high cost of evaluation of qualifications for registration. For example, this problem has been observed in cases where the Authority has at times struggled to evaluate qualifications for registration on the NQF due to resource constraints. This has led to delays in processing applications for registration of qualifications.

The process of verification of qualifications involves making payments to the awarding bodies in order to confirm the authenticity of the qualification. However, for qualifications awarded by foreign bodies, payments are much higher in most cases than what the Authority is charging. For example, the Authority charges K1,200 for all foreign qualifications irrespective of jurisdiction and is required to pay in some instances verification fees as high as K3,240 per qualification. This results in delays in processing foreign qualifications as the Authority has to look for additional funds to cover the deficit of the funds received from the clients and the funds paid to the foreign awarding body. From the clients' perspective, delays in processing verifications may lead to loss of employment or study opportunities.

The process of registering a qualification on the NQF involves two stages, evaluation of the qualification and approval to register the qualification on the NQF by the ZAQA Board. The first stage involves assembling a team of subject matter experts to evaluate the qualifications. Ordinarily, two subject matter experts are required to evaluate a qualification. However, due to resource constraints, the Authority is forced to use the same subject matter experts to evaluate more than one qualification. In terms of cost implications, this stage also involves payment of expert fees and associated costs.

The second stage involves convening a meeting of the Registration and Accreditation Committee of the Board to approve qualifications that have met the criteria for registration on the NQF. With regards to cost implications, the Authority spends at least K11,500 to process one qualification compared to K5,000 charged by the Authority. As with verification of foreign qualifications, this equally results in delays in processing qualifications for registration on the NQF, as the Authority has to look for additional funds to cover the deficit of the funds received from the awarding bodies and the funds required to process the qualifications. Delays in processing qualifications means that awarding bodies would continue offering non-quality assured qualifications which may lead to Zambian qualifications facing recognition challenges internationally.

With the Authority having to subsidise the two services above, other strategic functional areas such as the development of National Occupational Standards and conducting periodic studies that enhances quality standards in training and education, have been affected.

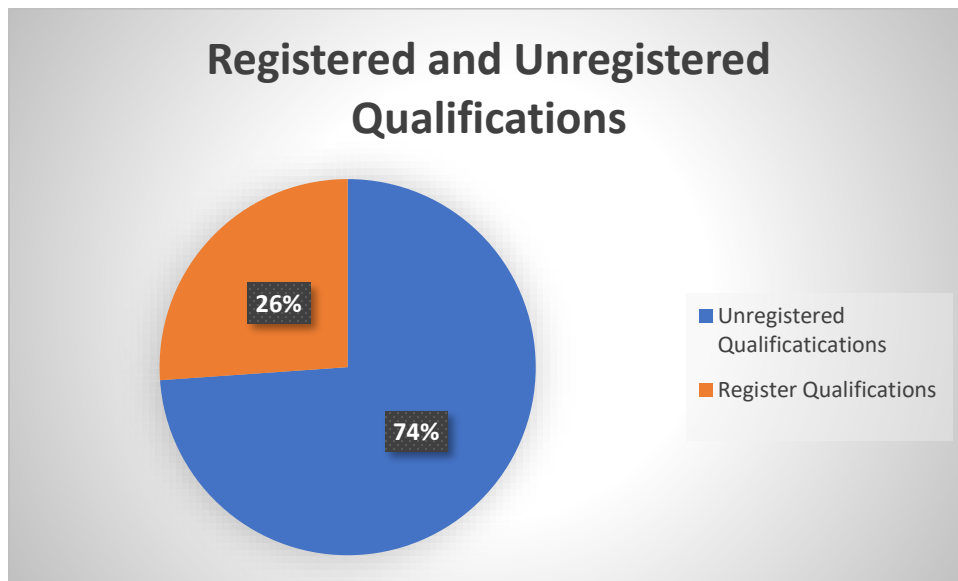
Currently the Authority does not allow for variation of a qualification once registered. Therefore, an awarding body that wishes to vary a registered qualification has to wait for the renewal date of the qualification to effect possible changes. This system is not responsive to addressing urgent emerging issues relating to registered qualifications. In the same vein, the Authority does not issue duplicate certificates to clients whose certificates are destroyed or lost. This results in clients being inconvenienced in accessing services requiring such certificates.

Failure to undertake these functions would lead to the following among others:

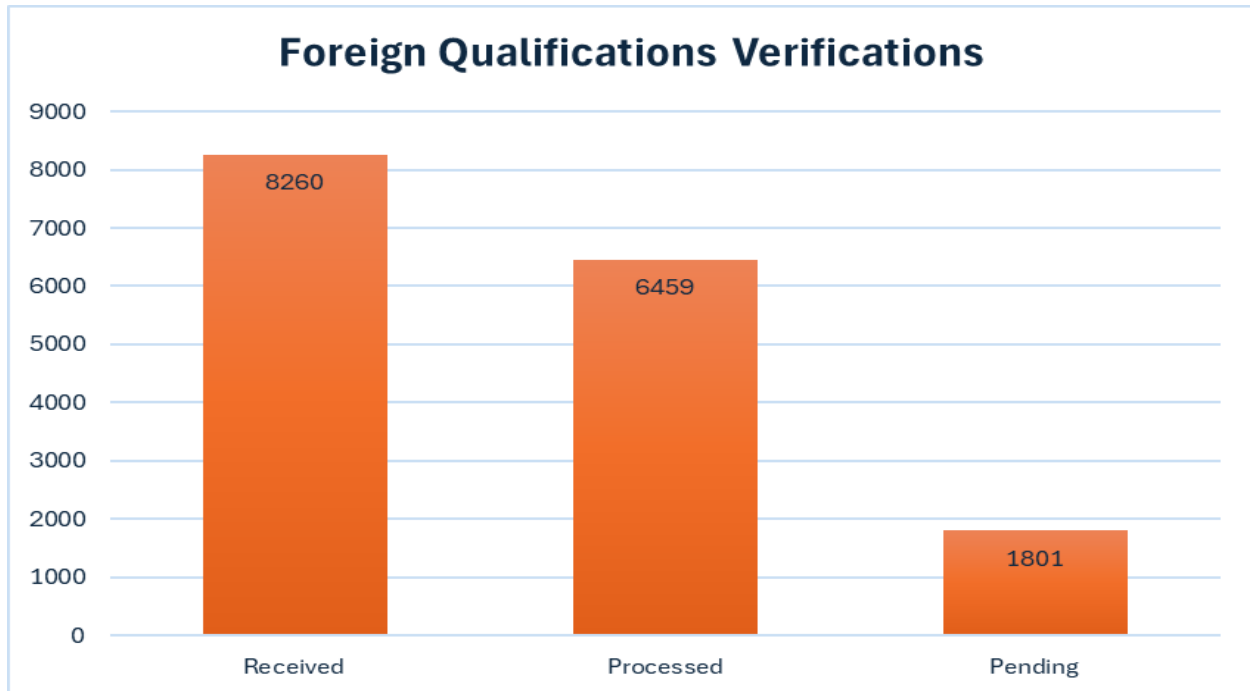
- a) Proliferation of fraudulent qualifications in the labour market;
- b) Qualifications of inferior quality being awarded;
- c) Loss of public confidence in the qualifications;
- d) Non-comparability of qualifications both locally and internationally;
- e) Limitation on the international mobility and recognition of Zambian learners in education and training;
- f) Lack of standardisation of Zambian qualifications;
- g) Delays in meeting the turnaround time in processing foreign qualifications as stipulated in the Act; and
- h) Graduates not meeting industry expectations.

BASELINE

Currently, there are about 2,582 qualifications that are being offered by awarding bodies in Zambia. Out of the 2,582 qualifications that are currently being offered by awarding bodies, the Authority has so far registered 648 qualifications on the NQF. This means that 1,834 qualifications are yet to be registered on the NQF. Figure 1 below presents the number of registered and unregistered qualifications.



With regards to verification of qualifications, particularly foreign qualifications, the Authority between January 2020 and December 2024 received a total of 8,260 foreign qualifications for processing. Out of this number, 6,459 qualifications were processed while qualifications pending processing stood at 1,801.



OBJECTIVES

General Objective

To implement the National Qualifications Framework in order to ensure that 100% of Zambian qualifications are locally and internationally comparable by 2026.

Specific Objectives

1. To conduct verification of foreign qualifications within the stipulated 60 days by 2026 in order to facilitate access to employment and study opportunities.
2. To increase the number of subject matter experts engaged for evaluation of qualifications in order to enhance objectivity and reduce turnaround time from 120 days to 60 days by 2026.
3. To facilitate variation of registered qualifications in order to make the qualifications responsive to emerging issues by 2026.

3. IDENTIFICATION OF OPTIONS

The Authority identified the following three options to resolve the identified problems:

1. Do Nothing
2. Information and Education Campaigns
3. Introducing Regulation

The three options were evaluated as below:

3.1 Do Nothing (Status Quo)

This option entails that the Authority continues conducting business the way it is currently operating. The Authority will continue facing the challenges that affect it from fulfilling its mandate, which among others have been inadequate staffing levels, inadequate funds to conduct verification of foreign qualifications and registration of qualifications. This problem has been observed in many cases where the Authority has relied on a limited number of subject matter experts to evaluate qualifications than is expected. This has led to delays in evaluating qualifications and compromised the qualification registration process.

Verification fees for foreign qualifications are paid in the currency of the country of issue of the qualification. Due to currency fluctuations, the amount of money the Authority pays for verification of qualifications has increased overtime. In 2018 when SI No. 4 of 2018 was issued, the exchange rate for the United State Dollar was around K12 to the dollar. As at December 2024 the exchange had rate increased from around K12 to around K28. The foregoing has affected the operations of the Authority as more and more resources are required to verify foreign qualifications relative to the fees charged by the Authority. This results in delays in processing foreign qualifications as the Authority has to look for additional funds to cover the deficit of the funds received from the clients and the funds paid to the foreign awarding body. From the clients' perspective, delays in processing verifications may lead to loss of employment or study opportunities.

The Zambia Qualifications Authority Act No 8 of 2024 has provided for the variation of a qualification once registered. Despite this provision, the fee for the variation is not provided for in the current statutory instrument. The implication of this is that an awarding body that intends to vary a registered qualification in order to incorporate urgent emerging issues has to wait for the renewal date of the qualification to make the possible changes. This means that the qualification will remain unresponsive to urgent emerging issues.

In the same vein, the Act has provided for the issuance of duplicate certificates. Despite this provision, the fee for the issuance of a duplicate is not prescribed. The implication of this is that an awarding body or client whose certificate is destroyed, is not issued with a duplicate by the

Authority. This results in clients being inconvenienced in accessing services requiring such certificates.

Against this background, maintaining the status quo means that the challenges that have been identified in the problem statement above will continue and the Authority would not effectively and efficiently execute its mandate. This will become more acute with the enhanced mandate arising from the Zambia Qualifications Authority Act No 8 of 2024.

SN	Description	Costs	Benefits
1	Government (ZAQA)	(K)	(K)
	Registration (1,510 Qualifications)	20,188,450.00	7,505,000.00
	Variation of qualifications (1 qualification)	10,300.00	0
	Verification of qualifications	505,531.00	144,800.00
	Subtotal	20,704,281.00	7,649,800.00
2	Awarding bodies		
	Registration (1,510 Qualifications)	7,505,000.00	12,683,450.00
	Variation of qualifications (1 qualification)	0	0
	Verification of qualifications	0	0
	Subtotal	7,505,000.00	12,683,450.00
3	Consumers (Members of the public)		
	Registration (1,510 Qualifications)	0	0
	Variation of qualifications (1 qualification)	0	0
	Verification of qualifications	144,800.00	360,731.00
	Subtotal	144,800.00	360,731.00
	GRAND TOTAL	28,354,081.00	20,693,981.00
	NET BENEFIT (B-C)	(7,660,100.00)	

3.2 Information and Education Campaigns

This option entails sensitising stakeholders such as Appropriate Authorities, Awarding bodies and the public. The Authority will carry out information, education and communication (IEC) campaigns through radio and Television programmes on the requirement for learners to verify their qualifications before enrolling in a Higher Education Institution. The Authority will also carry out information and education campaigns on the dangers of learners pursuing qualifications that are not registered with the Authority.

The Awarding Bodies will also be sensitised through workshops and seminars on the importance of registering their qualifications and ensuring that they only enrol learners whose qualifications are verified by the Authority. Furthermore, the Authority would issue guidelines to Appropriate Authorities and Awarding Bodies. The role of the Authority would be to conduct compliance audits and inspections to ensure that guidelines are adhered to.

However, this option is not effective because the Appropriate Authorities and Awarding Bodies may not adhere to the guidelines issued by the Authority. Therefore, Appropriate Authorities and Awarding Bodies would need monitoring to ensure compliance to ZAQA standards. The Authority would still need to conduct periodic compliance checks on the Appropriate Authorities and Awarding Bodies even after the information is shared.

It is clear that whilst the option serves well in dissemination of information to the public, Appropriate Authorities and Awarding Bodies, its demerit is that it does not address the challenges of shortage of subject matter experts. It does not address the challenge of ZAQA failing to effectively conduct registration of qualifications and verification of foreign qualifications. The Authority still needs resources to fund the engagement of the optimal number of qualified subject matter experts for all qualifications offered by Awarding Bodies around the country. Furthermore, even with IEC the Authority would still require resources to ensure that payments for verification of foreign qualifications are made to foreign awarding bodies. The Authority will still need resources to ensure that only learners with verified qualifications are enrolled in Higher Education Institutions and only members of the public with verified qualifications are offered employment.

SN	Description	Costs	Benefits
1	Government (ZAQA)		
	Sensitisation (seminars, radio and TV programmes)	12,900,000	
2	Awarding bodies		
	Capacity building	0	0
	Sensitisation	0	0
3	Consumers (Students and Sponsors)		
	Sensitisation	0	0
	Subtotal	12,900,000	0
	Net Benefit (B-C)	(12,900,000)	

3.3 Introducing Regulations

This entails revising and introducing regulations for management of registration and verification of qualifications, renewal of registration of qualifications, variation of qualifications, submission of learner achievement records; issuance of duplicate certificates and inspections of awarding bodies and employers.

The regulations will provide for the following:

- a) Registration of qualifications and renewal: This regulation will provide criteria for both registration and renewal of registration of qualifications. The regulation will also provide for revision of fees in order to facilitate the engagement of subject matter experts in the evaluation of qualifications for registration. The engagement of more experts will enhance the objectivity of the process and improve on turnaround time. The fees will cater for administrative costs related to registration of qualifications.
- b) Variation of qualifications: This regulation introduces criteria for variation of qualifications in order to make qualifications responsive to emerging issues. The regulation also introduces fees to defray administrative expenses.
- c) Submission of Learner Achievement Records: This regulation introduces the format for submission of learner achievement records to the Authority. The Principal Act requires awarding bodies to submit learner achievement records within 90 days of award of a qualification.
- d) Issuance of duplicate certificates: This regulation will introduce the procedure for issuance of duplicate certificates and accompanying fees to defray administrative costs. This regulation is important as it will allow members of the public to obtain duplicate certificates in the event of loss or destruction of the original.
- e) Inspection of Register of qualifications: This regulation will introduce the procedure for inspection of the Register of qualifications and accompanying fees to defray administrative costs. This regulation is important as it will allow members of the public and stakeholders to inspect the register for information on registered qualifications.
- f) Inspections of awarding bodies and employers: This regulation will provide for the appointment and powers of inspectors. The regulations will further provide procedures for conducting inspections in order to curb the enrolment or employment of persons without requisite qualifications.

SN	Description	Costs	Benefits
1	Government (ZAQA)	(K)	(K)
	Registration of qualifications	20,188,450.00	20,808,000.00
	Variation of qualifications (1 qualification)	10,300.00	10,500.00
	Verification of qualifications - Foreign	314,736.00	316,000.00
	Verification of qualifications – Examinations Council of Zambia	103,300.00	105,000.00
	Subtotal	20,616,786.00	21,239,500.00
2	Awarding Bodies		
	Registration of qualifications	20,808,000.00	
	Variation of qualifications (1 qualification)	10,500.00	
	Verification of qualifications - Foreign	0	
	Verification of qualifications – Examinations Council of Zambia	0	
	Subtotal	21,239,500.00	
3	Consumers (Students and Sponsors)		
	Registration (1,510 Qualifications)	0	
	Variation of qualifications (1 qualification)	0	
	Verification of qualifications Foreign	316,000.00	
	Verification of qualifications – Examinations Council of Zambia	105,000.00	
	Subtotal	421,000	
	Grand Total		
	Net Benefit (B-C)		

Summary

Option	Cost	Benefit	Net Benefit (B-C)
Do Nothing	28,354,081.00	(20,693,981.00)	(7,660,100.00)
Information and Education Campaigns	12,900,000.00	0	(12,900,000.00)
Introducing Regulation			

The benefits of introducing regulations particularly for awarding bodies and consumers are qualitative rather than quantitative. For awarding bodies benefits of introducing regulations include:

1. Efficiency in processing of applications for registration of qualifications on the NQF
2. Awarding quality assured and internationally comparable qualifications;
3. Enhanced public confidence in the qualifications; and
4. Possibility of being able to apply for variation of qualifications.

For consumers, the benefits of introducing regulations include:

1. Efficiency in processing of applications for verification of qualifications; and
2. Keeping people with forged or fraudulent qualifications away from the job market.

3.5 Stakeholder Mapping

SN	Stakeholder	Interest
1.	Awarding bodies <ul style="list-style-type: none"> • Northern Region • Southern Region 	<ul style="list-style-type: none"> • Registration of qualifications on the NQF • Variation of qualifications • Verifications of qualifications
2.	Employers' representative bodies e.g Zambia Federation of Employers	<ul style="list-style-type: none"> • Verification of qualifications
3.	Appropriate Authorities/Regulatory bodies namely HEA, TEVETA and Examinations Council of Zambia	<ul style="list-style-type: none"> • Stakeholder
4.	Professional bodies e.g ZIHRM, HPCZ, LAZ EIZ etc	<ul style="list-style-type: none"> • Verification of qualifications

5.	Government ministries	<ul style="list-style-type: none"> • Stakeholders
6.	Civil Society Organisations in the Education Sector	<ul style="list-style-type: none"> • Stakeholders
7.	Cooperating Partners	<ul style="list-style-type: none"> • Stakeholders
8.	Training institutions	<ul style="list-style-type: none"> • Verification of qualifications

KEY PROVISIONS BEING INTRODUCED BY THE DRAFT REGISTRATION, VERIFICATION AND EVALUATION REGULATIONS

Among the provisions being introduced in the SI include:

1. **Variation of certificate of registration:** The Principal Act provides for variation of qualifications. However, operationalisation of this provision requires issuance of an SI to proscribe the fees payable for the service. Same applies to provisions relating to issuance of duplicate certificates and inspections of the register of qualifications.

Prior to the enactment of Act No. 8 of 2024, ZAQA did not have the mandate to vary registered qualifications. Therefore, awarding bodies that wished to have their qualifications varied were advised either to resubmit the qualifications for registration or wait to effect the changes, at the point of renewal. The provisions on variation of qualifications once operationalized will make it possible for the Authority to process applications for variation of qualifications.

2. **Refunds:** It is proposed that Fees payable under the Act should be non-refundable. This is because related costs incurred by the Authority in providing its services are non-refundable. Examples in point are fees payable to the Examinations Council of Zambia and foreign awarding bodies, for verification of foreign qualifications.
3. **Appointment of Inspectors:** The Regulations provide for the appointment and powers of inspectors. The repealed ZAQA Act did not provide for an inspectorate unit which hampered the Authority's efforts to enforce its provisions and ensure compliance. The inspectorate unit will make it possible for the Authority to effectively implement the provisions of the Act.
4. **Fees:** The Regulations prescribe fees for new ZAQA services and proposes some adjustments to existing fees. The table below shows current and proposed fees for ZAQA services.

SN	Item		<u>Proposed Fees</u> <u>Fee Units (0.30)</u>	<u>Current Fees</u>
1.	Duplicate Certificate		K100	NA
2.		Verification fees (Higher Education, Trades and Occupations sub-frameworks)		
	Local qualifications	Degree	K400	K500
		Diploma, Certificate	K200	K200
	Verification and Evaluation of Foreign qualifications		K1,200	K1,200
	General education qualification (Local)		K50	K50
3.		Registration of Qualifications and Renewal		
	Higher Education		K10,000	K5,000
	TEVET		K10,000	K5,000
	General education qualification		K10,000	K5,000
	Foreign schooling qualification		K50,000	K10,000
	Foreign qualification issued under the Higher Education and TEVET sub-frameworks		K50,000	K10,000
	Discontinued local qualifications		K5,000	K5,000
4	Variation of a qualification	Local qualification	K5,000	NA
		Foreign schooling qualification	K25,000	NA
		Foreign qualification issued under the Higher Education and TEVET sub-frameworks	K25,000	NA
5	Inspection Fee		K200	NA