Discussion Paper
On Improving the Quality of Business Advisory Services In South Africa
To Stimulate Debate, Policy Consideration and Strategies

Issued by:

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Contributions recognised from other stakeholders:
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<tr>
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<th>Description</th>
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<tbody>
<tr>
<td>AAT (SA)</td>
<td>Association of Accounting Technicians</td>
</tr>
<tr>
<td>ACCA</td>
<td>Association of Chartered Certified Accountants South Africa</td>
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<tr>
<td>ATP</td>
<td>Associate Tax Practitioner</td>
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<tr>
<td>BA</td>
<td>Business Advisor</td>
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<tr>
<td>BAS</td>
<td>Business Advisory Services</td>
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<td>BDS</td>
<td>Business Development Services</td>
</tr>
<tr>
<td>BDSP</td>
<td>Business Development Services Provider</td>
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<tr>
<td>CBA</td>
<td>Certified Business Advisor</td>
</tr>
<tr>
<td>CMC</td>
<td>Certified Management Consultant</td>
</tr>
<tr>
<td>CMP</td>
<td>COMENSA Master Practitioner</td>
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<tr>
<td>COMENSA</td>
<td>Coaches and Mentors South Africa</td>
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<tr>
<td>CPD</td>
<td>Continuing Professional Development</td>
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<tr>
<td>CSI</td>
<td>Corporate Social Investment</td>
</tr>
<tr>
<td>CSP</td>
<td>COMENSA Senior Practitioner</td>
</tr>
<tr>
<td>CTP</td>
<td>Certified Tax Practitioner</td>
</tr>
<tr>
<td>DHET</td>
<td>Department of Higher Education and Training</td>
</tr>
<tr>
<td>DMASA</td>
<td>Direct Marketing Association of South Africa</td>
</tr>
<tr>
<td>DRR</td>
<td>Directorate Registration and Recognition</td>
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<tr>
<td>DSBD</td>
<td>Department of Small Business Development</td>
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<tr>
<td>Dti</td>
<td>Department of Trade and Industry</td>
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<tr>
<td>ECDi</td>
<td>Entrepreneurship and Cooperative Development Institute</td>
</tr>
<tr>
<td>EEP</td>
<td>Economic Empowerment Professional</td>
</tr>
<tr>
<td>EPi</td>
<td>Entrepreneurial Planning Institute</td>
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<td>ESD</td>
<td>Enterprise Supplier Development</td>
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<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>FAC</td>
<td>Financial Accountant in Commerce</td>
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<tr>
<td>FAP</td>
<td>Financial Accountant in Practice</td>
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<tr>
<td>GEM</td>
<td>Global Entrepreneurship Monitor</td>
</tr>
<tr>
<td>GIZ</td>
<td>Deutsche Gesellschaft für Internationale Zusammenarbeit (German Society for International Cooperation)</td>
</tr>
<tr>
<td>GLP</td>
<td>Good Laboratory Practice Act</td>
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<tr>
<td>IAC</td>
<td>Institute of Accounting and Commerce</td>
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<tr>
<td>IBASA</td>
<td>Institute of Business Advisors of Southern Africa</td>
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<tr>
<td>IBDS</td>
<td>Incubator and Business Development Standards</td>
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<td>ICBA</td>
<td>International Conference on Business Advising</td>
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<td>ICMCI</td>
<td>International Council of Management Consulting Institutes</td>
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<tr>
<td>ID</td>
<td>Identification</td>
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<tr>
<td>IDC</td>
<td>Industrial Development Corporation</td>
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<td>IDM</td>
<td>Interactive Direct Marketing</td>
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<tr>
<td>IMCSA</td>
<td>Institute of Management Consultants and Master Coaches South Africa</td>
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<tr>
<td>IMDPro</td>
<td>Interactive and Direct Marketing Professional</td>
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<tr>
<td>IRBA</td>
<td>Independent Regulatory Board for Auditors</td>
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<tr>
<td>ISO</td>
<td>International Organisation for Standardisation</td>
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<tr>
<td>MC</td>
<td>IMCSA Certified Master Coach</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Full Form</td>
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<tr>
<td>MCS</td>
<td>Management Consulting Services</td>
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<tr>
<td>MCSP</td>
<td>Management Consulting Services Provider</td>
</tr>
<tr>
<td>MEL</td>
<td>Monitoring, Evaluation and Learning</td>
</tr>
<tr>
<td>MIDM</td>
<td>Master of Interactive and Direct Marketing</td>
</tr>
<tr>
<td>MOU</td>
<td>Memorandum of Understanding</td>
</tr>
<tr>
<td>NEF</td>
<td>National Empowerment Fund</td>
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<tr>
<td>NGO</td>
<td>Non-governmental organisation</td>
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<td>NQF</td>
<td>National Qualifications Framework</td>
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<td>NYDA</td>
<td>National Youth Development Agency</td>
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<tr>
<td>OFO</td>
<td>Organising Framework for Occupations</td>
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<td>OQSF</td>
<td>Occupational Qualifications Sub-Framework</td>
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<tr>
<td>PBA</td>
<td>Principal Business Advisor</td>
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<tr>
<td>PSET</td>
<td>Post School Education and Training</td>
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<td>QASI</td>
<td>Quality Assurance and Support Initiative</td>
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<tr>
<td>QC</td>
<td>Quality Councils</td>
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<tr>
<td>QCTO</td>
<td>Quality Council for Trades and Occupations</td>
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<tr>
<td>SA</td>
<td>South Africa</td>
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<tr>
<td>SABS</td>
<td>South Africa Bureau of Standards</td>
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<tr>
<td>SAIBA</td>
<td>Southern African Institute for Business Accountants</td>
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<tr>
<td>SAICA</td>
<td>South African Institute of Chartered Accountants</td>
</tr>
<tr>
<td>SAIPA</td>
<td>South African Institute of Professional Accountants</td>
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<tr>
<td>SANAS</td>
<td>South African National Accreditation System</td>
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<tr>
<td>SANS</td>
<td>South African National Standard</td>
</tr>
<tr>
<td>SAQA</td>
<td>South African Qualifications Authority</td>
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<tr>
<td>SARIPA</td>
<td>South African Restructuring and Insolvency Practitioners Association</td>
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<tr>
<td>SDP</td>
<td>Skills Development Provider</td>
</tr>
<tr>
<td>SECO</td>
<td>State Secretariat for Economic Affairs (Switzerland)</td>
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<tr>
<td>Seda</td>
<td>Small Enterprise Development Agency</td>
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<td>Sefa</td>
<td>Small Enterprise Finance Agency</td>
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<tr>
<td>Services SETA</td>
<td>Services Sector Education and Training Authority</td>
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<tr>
<td>SETA</td>
<td>Sector Education and Training Authority</td>
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<tr>
<td>SIC</td>
<td>Standard Industry Classification</td>
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<tr>
<td>SMMEs</td>
<td>Small micro and medium-sized enterprises</td>
</tr>
<tr>
<td>TMA</td>
<td>Turnaround Management Association Southern Africa</td>
</tr>
<tr>
<td>TVET</td>
<td>Technical and Vocational Education and Training</td>
</tr>
<tr>
<td>UN</td>
<td>United Nations</td>
</tr>
<tr>
<td>UNDP</td>
<td>United Nations Development Programme</td>
</tr>
<tr>
<td>UN NGO</td>
<td>United Nations Non-Governmental Organisation</td>
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<tr>
<td>USAID</td>
<td>United States Agency for International Development</td>
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1. EXECUTIVE SUMMARY

The purpose of this discussion paper is to facilitate debates towards a common understanding and consensus about professionalisation, regulation and/or standardisation of Business Advisory Services. It also aims to identify optional strategies and provide guidance as to a proposed way forward.

The process to develop this discussion paper started with the SEED Symposium of 2017, followed by various conferences, interviews, stakeholder engagements, provincial workshops and a consolidation of comments for presentation at a final stakeholder forum scheduled for 9 March 2020.

A scan of the legislative environment reflected that there are some gaps that still need to be addressed and perhaps improvement in linkages and relevance to the BAS industry, especially around regulation, standards development, monitoring and enforcement. This will require more engagement with different entities to clarify roles and responsibilities.

Analysis of the supply environment revealed the existence of a myriad of actors involved in the funding, facilitating and implementation across constituencies internationally and locally. Some of the interventions are project-based and/or region-based. At the same time, hybrid models and partnerships are increasing in popularity.

Specific qualifications for and capacitation of Business Advisors have been identified as a gap between supply and demand and need addressing as a priority. Many education and training institutions and both formal and informal providers are starting to respond to this demand.

CPD programmes vary from formal and documented CPD programmes which are externally validated according to international standards, to non-existent, depending on the body in question.

Candidacy programmes are less developed but no less important, as is borne out by the experience in larger practices, which develop competencies at nearly twice the pace of other initiatives.

Strategies aimed at improving the overall quality of BAS offering include;

1. Regulation of the industry by law,
2. Professionalisation alternatives, including self-regulation
3. Education and Training and
4. Ensuring the quality of service delivery.

There is a need to understand the implications of each strategy and the associated implications. The strategies are described to inform the way forward, which will be presented at a stakeholder forum for final adaptation and ratification for presentation to the Department of Small Business Development (DSBD).

The process that has been followed to date, has endeavoured to obtain broad input and consensus, without advocating a specific bias.
2. PURPOSE AND PROCESS

2.1 Purpose and background

The purpose of the Discussion Paper is to document all aspects of the regulatory, legislative, supply- and demand-side of the BAS environment and industry. It maps key stakeholders and contextualises BAS within Business Development Services (BDS). It seeks to clarify the strategies that have been considered to improve the quality of BAS and document the various perspectives and interpretations.

The implications, costs and consequences of the various strategies necessitated in-depth debate and consideration.

The paper culminates in conclusions and recommendations regarding process, policy, standards and practice; and should lead the appropriate stakeholder/s to adopt roles and responsibilities and undertake critical actions.

Stakeholders have long been advocating for improved quality in the delivery of services to the emerging, small and growing business clients. Debates over occupations, alternate titles, levels, designations and similar terminology have been addressed and require action to adopt a standardised approach which is acceptable to the majority.

There has been concern regarding the perceived inconsistent and unregulated competency requirements and ethical conduct, which have resulted in a detrimental risk and impact on the livelihoods and sustainability of emerging, small and growing businesses and on the related stakeholders.

2.2 Process followed

These discussions started with the SEED Symposium of 2017, which culminated in the formation of a Working Group tasked with the responsibility of developing BAS Standards potentially under the auspices of the South African Bureau of Standards.

The International Conference on Business Advising (ICBA), held on 21-23 November 2017 further debated this topic. The Services SETA’s launch of the Entrepreneurial and Cooperatives Development Institute (ECDI) and its Programme of Action on 01 March 2018, with a focus on BAS, raised further prospects of a way forward.

To further aid the process, the Department of Small Business Development convened a meeting of professional bodies, on 05 March 2018, to discuss the outcome of the ICBA conference. At the beginning of this year, the DSBD, SEED, Seda and Services SETA undertook to draft a discussion paper to aid the debates.

These discussions sought to aid the process by among others, mapping out key BAS stakeholders and their respective responsibilities. The stakeholder mapping process identified multiple executive authorities and government departments which include among others, the Departments of Trade and Industry, Economic Development, Small
Businesses Development and Higher Education and Training. The paper observes that the current situation requires intergovernmental involvement, response and coordination. Different agencies and entities within each department will lead different aspects of the implementation.

In 2017 and in response to the above reality, an *ad hoc* Working Group was formed as an outcome of the SEED Symposium of that year, to lead the development of a BDS Standard through the SABS. Considerable progress was made in identifying key components of the BDS Standard but more consultation to foster a common understanding and mobilise support was recognised as a necessary requirement.

On 21 to 23 November 2017, OSIBA Management hosted the ICBA (International Conference on Business Advising). The Conference identified four key actions as outcomes, namely,

1. Professionalisation
2. Industry Collaboration
3. Education and Standards
4. Appropriate Regulation.

Click [here](#) for a copy of the Conference Report. This Discussion Paper is aligned to these outcomes and seeks to expand on the relationship of these outcomes as strategies for improving the quality of BAS and BDS.

On 01 March 2018, the Services SETA announced its joint Programme of Action for establishing a national Entrepreneurship and Cooperative Development Institute (ECDi). This Programme of Action was informed by months of in-depth research, analysis and stakeholder engagement. It sought to close critical supply-side gaps for scaled impact and services to entrepreneur and emerging, small and growing businesses.

Business Advisory Services is one of the nine adopted programmes which has several actions aligned to objectives including the development of a standardised set of products for facilitating and funding BAS, mapping career paths aligned to the OFO and NQF, and enabling matching of supply and demand using technology.

On 05 March 2018, the Department of Small Business Development convened a meeting of professional bodies operating within the BAS Industry and key stakeholders to discuss the ICBA 2017 outcomes and identified actions. The meeting endorsed the recommendation to develop a Discussion Paper setting out the roles and responsibilities of PSET (Post School Education and Training) and other stakeholders in the Professionalisation of an Occupation such as Business Advisory Services.

Understanding the legislative and regulatory environment and professionalisation of other professions would provide informed guidance on appropriate steps and actions to Professionalise Business Advisory Services.

The Services SETA undertook to fund the development of the draft Discussion Paper given that it overlapped with some of its own deliverables.
From May 2018 to January 2019, the Services SETA ran a procurement process for several deliverables including the Discussion Paper. The process was unsuccessful in appointing a specialist service provider.

On 14 and 15 January 2019, SEED approached the Services SETA to explore alternative options for developing the Discussion Paper which resulted in the Parties allocating internal resources for this purpose. The Parties, together with the DSBD and Seda worked collaboratively in this regard.

On 25 February 2019, the Services SETA invited a small group of core stakeholders to an engagement to assist in the development of the Discussion Paper. The initial Discussion Paper was presented at the SEED South Africa Symposium 2019 on 02 and 03 March 2019 at the Innovation Hub in Pretoria. Core Partners were invited to comment and provide input, and structured stakeholder engagements were organised, including provincial stakeholder workshops, which were analysed as inputs to the final draft.

On 20 March 2019, Seda invited the same small group of core stakeholders to a follow-up engagement. The outcomes of this discussion are incorporated in this document.

In January 2020 Seda appointed Profweb (Pty) Ltd to finalise the discussion paper, in preparation for a final stakeholder forum dated 9th March 2020.

This Discussion Paper is jointly issued by the DSBD, Seda, Services SETA and SEED. Contributions from other stakeholders are duly recognised. Final recommendations will be directed to the appropriate entity or entities for actioning.
3. DEFINITION OF KEY TERMS

3.1 Introduction

No agreed standard definition exists for the terms utilised in this paper and recommendations are made accordingly.

An industry consultation process was initiated to attempt to consolidate definitions used by various recognised professional bodies. Due care has been taken to avoid arbitrary definitions and to consider globally accepted terminology.

The focus should be on finding common ground and not to continue with conflicting and confusing definitions. The benefit of utilising commonly accepted definitions is that one can draw from multiple sources without degrading the quality of a discussion.

To be accepted, definitions should refer to the source for future reference and or discussion.

The net result of the varying definitions is that an “inclusive” approach to the definitions is required in order to reference the various bodies of knowledge and competencies already defined.

As a result of many discussions, the following recommendations regarding terminology are made:

Consultant and Advisor (Adviser) are synonyms for each other. By inserting terms such as Business Consultant or Business Advisor, we are focusing on services provided to businesses.

Small Business Advisor or Small Business Consultant means a professional who focuses on businesses which are small in size.

3.2 Professions, Roles and functions

An experienced consultant or advisor may be able to perform multiple roles (or functions), such as mentor, coach, facilitator, trainer, implementer and more. This is well described in the article https://www.businessessentials.co.za/2014/11/24/multiple-hats-worn-consultants/

In addition, certain roles are also defined as professions, specifically Consulting, Coaching and Business Mentoring, whilst others are provided as advisory under specific professions such as Accounting, Quality, Project Management etc.

As such, it is recommended that the Professional definition override any arbitrary role or function definition.

Care should be taken to ensure that using “catch all definitions” do not imply that a professional is competent in every Role/ Function by default.

It is clear from the research that the various professional bodies and references define terms differently, and in some cases even attribute a specific sector to the definition; for example, “small business”. This attribution is not agreed to by all the professions researched. The focus on small business is a choice made by the individual professional, who then needs to ensure that he or she has the required competencies to provide the required quality of service. In addition, the duration
of the relationship with the client should not be a key requirement of a definition, with the possible exception of a mentor.

**Cautionary note to this section**: There are many somewhat conflicting and unsubstantiated or unresearched definitions which lead to confusion and arbitrary distinctions between terms, depending on their source. The intention of this section is to find common ground and to simplify the terminology.

### 3.3 Key Definitions

**Business Advisor** – A business advisor is a consultant who provides business owners with information that will help them run their businesses more effectively. Advisors can be consulted on a one-time occasion to assist with streamlining or improving a business, or they can play a more active role, offering recurrent advice sessions to their clients. Many business advisors offer one on one consultation along with business classes designed for groups of people, such as new business owners. Classes can provide a low-cost way to access business advice that is especially useful for people who may not be able to afford a full private consultation.

https://www.wisegeek.com/what-is-a-business-advisor.htm

**Business Consultant** – is the same as a management consultant based on comprehensive research and reference to dictionary definitions. There are some deviations from this view but for the purposes of this discussion paper, it makes sense to treat them as synonyms.

*A business consultant is a professional who analyses businesses, creates solutions to problems, and helps businesses develop efficient plans for meeting their goals.*

https://kwhs.wharton.upenn.edu/term/business-consultant/

**Management Consultant**

A person or company that gives professional advice about how to run a company or organization more effectively, or...

"one who helps an organisation to solve issues, create value, maximise growth, and improve performance through the application of their knowledge, techniques and assets to provide objective advice, expertise and specialist skills which that organisation may be lacking". Source: IMCSA

**Certified Management Consultant**

A professional management consultant who meets the relevant requirements of character, qualifications, experience, competence and independence established by the national professional body (IMCSA) issuing the certification and which is recognised reciprocally in over 50 countries belonging to the ICMCI. The CMC is an international standard and a protected trademark and can only be issued by a single member institute for each country. Source: IMCSA

**Business Mentor** – A mentor, in simple words, is someone who offers their knowledge, expertise and advice to those with less experience. By leveraging their experience and skills, mentors guide mentees in the right direction.

A mentor helps mentees consider opportunities for career growth, gain confidence and improve interpersonal skills. The support is based on the mentor’s own experiences and learnings, which makes them more reliable figures in the eyes of the mentees.

Source: [https://smallbiztrends.com/2016/02/difference-mentor-coach.html](https://smallbiztrends.com/2016/02/difference-mentor-coach.html)
A business mentor is someone with more entrepreneurial business experience than you who serves as a trusted confidante over an extended period of time, usually free of charge. Source: [https://www.thebalancesmb.com/the-value-of-a-business-mentor-1200818](https://www.thebalancesmb.com/the-value-of-a-business-mentor-1200818)

A business mentor – provides semi-structured guidance and support to individuals within a wide range of enterprises to empower them to achieve personally-defined advancement.[1] Mentoring is more than 'giving advice' or passing on experience. It's about motivating and empowering the other person to identify their issues and reach their goals by understanding and respecting their ways of thinking and working.[2] Mentoring involves primarily listening with empathy, sharing experience (usually mutually), professional friendship, developing insight through reflection, being a sounding board and encouraging.[3]

Business, Executive or Leadership Coach – is someone who engages in regular, structured conversation with a "client": an individual or team who is within a business, profit or non-profit organisation, institution or government and who is the recipient of business coaching. Source: World Association of Business Coaches and IMCSA.

Coaching is defined as "a professional, collaborative and outcomes-driven method of learning that seeks to develop an individual and raise self-awareness so that he or she might achieve specific goals and perform at a more effective level". Source: [https://www.comensa.org.za/Information/Coaching](https://www.comensa.org.za/Information/Coaching)

Business coaching is the process of engaging in regular, structured conversation with a "client": an individual or team who is within a business, profit or non-profit organization, institution or government and who is the recipient of business coaching. The goal is to enhance the client's awareness and behaviour so as to achieve business objectives for both the client and their organization. Source: [https://www.wabccoaches.com/includes/popups/definition.html](https://www.wabccoaches.com/includes/popups/definition.html)

A useful distinction can be made between services that are provided for both the management and the business, such as Consulting, and services provided to individuals, such as Coaching and Mentoring.

The diagram below may provide further clarification.

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[2] [https://www.ppd.admin.cam.ac.uk/professional-development/mentoring-university-cambridge/what-mentoring](https://www.ppd.admin.cam.ac.uk/professional-development/mentoring-university-cambridge/what-mentoring)

Note: There is no specific requirement to define the “firm or agency” in the definition of business consultant, as any one of the professions defined in this section could belong to a formal or informal grouping of professionals. Those would be termed “business consulting firms, practices or agencies, or MCSP in ISO 20700”.

The IMCSA distinguishes firms as “practices” and accredits them separately to the individual professional. For a practice to be accredited, senior partners or directors need to commit to the professional and ethical standards on behalf of the practice. Source: IMCSA

As a result of many discussions and inputs (including provincial stakeholder inputs), the following recommendations regarding terminology are made:

Consultant and Advisor (Adviser) are synonyms for each other. By inserting terms such as Business Consultant or Business Advisor, we are focusing on services provided to businesses.

Small Business Consultant or Small Business Advisor means a professional who focuses on small businesses.

Business Development Services include training, consultancy and advisory services, marketing assistance, information, technology development and transfer, and business linkage promotion. A distinction is sometimes made between “operational” and “strategic” business services. Operational services are those needed for day-to-day operations, such as information and communications, management of accounts and tax records, and compliance with labour laws and other regulations. Strategic services, on the other hand, are used by the enterprise to address medium- and long-term issues in order to improve the performance of the enterprise, its access to markets, and its ability to compete. The delivery of BDS as part of business-to-business
relationships—including supplier/buyer, subcontracting, franchise and licensing relationships—is particularly common for smaller firms.¹

NB: it is critical to align terminology between the discussion papers on BAS and BDS to avoid confusion and disagreement.

![Diagram Highlighting BAS as a Subset of BDS](image)

**Figure 2 Diagram Highlighting BAS as a Subset of BDS**

### 3.4 Regulation terminology

**Regulation.** A rule of order having the force of law, prescribed by a superior or competent authority, relating to the actions of those under the authority's control. [https://law.jrank.org/pages/9734/Regulation.html](https://law.jrank.org/pages/9734/Regulation.html)

**Self-Regulation** - the fact of something such as an organization regulating itself without intervention from external bodies. [https://www.lexico.com/en/definition/self-regulation](https://www.lexico.com/en/definition/self-regulation)

**Accreditation** - is a formal process by which a recognised body, usually a non-governmental organisation (NGO), evaluates and recognises that an organisation meets applicable predetermined and published standards. Accreditation standards are usually regarded as optimal and achievable and are designed to encourage continuous development efforts within accredited organisations. An accreditation choice about a specific organisation is made following a periodic on-site evaluation by a team of peer reviewers, typically conducted every two to three years. Accreditation is often a voluntary procedure in which organisations choose to participate, rather than being mandated by law.

¹ Committee of Donor Agencies for Small Enterprise Development; World Bank Group: 2001)

than one required by law and regulation. See also ISO 17021 – Requirements for certification bodies.

Certification - is a process by which an authorised body, either a governmental or non-governmental organisation, evaluates and recognises either an individual or an organisation as meeting pre-determined requirements or standards. Although the terms accreditation and certification are frequently used interchangeably, accreditation usually applies only to organisations, while certification may apply to individuals as well as organisations. When applied to individual practitioners, certification usually infers that the individual has received additional education and training and demonstrated competence in a specialty area beyond the minimum requirements set for licensure. See also ISO 17024 - Conformity assessment – General requirements for bodies operating certification of persons.

Grading - is the process of determining individual grades or levels of specialisation and competence and may be role or function specific. Grading descriptors/designations may vary between professional bodies and have an impact on fees and client expectations. Each professional body has its own grading system.

SAQA does not require a professional body to adopt a specific grading system. It is not possible to dictate a standardised grading system, but by studying the prominent ones one can recommend a generic or equivalent grading system.

Conformity assessment - involves a set of processes that show your product, service or system meets the requirements of a standard. Compliance means adhering to the requirements of agreed standards without the formalized certification and recertification process. (adapted from https://reciprocitylabs.com/resources/what-is-iso-compliance/)

Conformity Assessment Bodies means a conformity assessment body, which is a body that performs Conformity Assessments and that can be the object of Accreditation and includes an Applicant and/or accredited body, which shall in turn include calibration, testing and verification laboratories, certification bodies, inspection bodies, rating agencies and any other type of body that may be added to SANAS scope of activity.

Professional body - means a body of expert practitioners in an occupational field and includes an occupational body and statutory council.

Professional designation - means a title or status conferred by a professional body in recognition of a person’s expertise and/or right to practise in an occupational field. 

Progression pathway - means a hierarchy of two or more related qualifications and/or professional designations that allow for vertical progression within a profession.

A Standard - is a document that provides requirements, specifications, guidelines or characteristics that should be used consistently to ensure that materials, products, processes and services are fit for their purpose.
4. STAKEHOLDER MAPPING

This section profiles the Executive Authorities (Ministers), National Departments, Public Entities and recognised professional bodies that play a role and have an interest in the emerging and small business advisory services industry.

Figure 2 illustrates these entities and shows the relationships between the entities in terms of reporting and function. A narrative summary of each entity and its role and or interest in the emerging and small business advisory services industry is provided below.

4.1 Post School Education and Training

Department of Higher Education and Training - Department of Higher Education and Training (DHET) is responsible for overseeing Universities, TVET Colleges, SETA Coordination and Community Colleges, organising occupations and overseeing SAQA, QCTO and SETAs. OFO 2017 recognised 21 occupations for management consultant, as discussed further on in this paper.

South African Qualifications Authority - The South African Qualifications Authority (SAQA) is a statutory body, regulated in terms of the National Qualifications Framework Act No. 67 of 2008. It is responsible for verification of South African qualifications achievement; national learners’ records database; professional body recognition and professional designation registration; registration of qualifications and part qualifications; list of accredited providers, and evaluation of foreign qualifications. The Directorate Registration and Recognition (DRR) of SAQA is responsible for the evaluation and processing of applications for recognition of professional bodies and registration of professional designations for the purposes of the NQF Act.

Quality Council for Trades and Occupations - The Quality Council for Trades and Occupations (QCTO) is a Quality Council established in 2010 in terms of the Skills Development Act Nr. 97 of 1998. Its role is to oversee the design, implementation, assessment and certification of occupational qualifications, including trades, on the Occupational Qualifications Sub-Framework (OQSF). QCTO has delegated some authority to Services SETA for skills development provider accreditation and quality assurance of learner achievements for qualification that fall under its economic scope.

Services Sector Education and Training Authority - Services Sector Education and Training Authority (Services SETA) is responsible for the disbursement of the training levies paid by employers through a management system motivated by skills requirement assessment and monitoring. The Services SETA ensures that the skill requirements of the services sector are identified, and that adequate and appropriate skills are readily available. The Services SETA contributes to the improvement of sector skills through achieving a more favourable balance between demand and supply, and ensuring that education and training is provided subject to validation and quality assurance; meets agreed standards within a national framework, and ensures that new entrants to the labour market are adequately trained; and acknowledges and enhances the skills of the current work force. The Services SETA facilitates stakeholder engagement to develop qualifications and modifications and to promote adequacy of supply.
Providers of Informal Training – There are numerous providers of non-Seta accredited short programmes and courses plus online learning programmes. These have been provided successfully over decades and some have been developed on request due to the immediacy of the demand and changing circumstances. Many BAs have shown preference for these types of interventions over formal programmes due to cost and relevance issues plus the speed of skills transfer. This view has been confirmed by the provincial stakeholder forums and discussions. Some of these courses are recognised by professional bodies internationally or locally.

4.2 Professional Bodies – Generic

Coaches and Mentors South Africa (COMENSA) - is a SAQA recognised non-statutory professional body ID 942, start date 20 May 2015, recorded as COMENSA. COMENSA has three registered professional designations namely: COMENSA Credentialled Practitioner (CCP) SAQA ID 600, COMENSA Senior Practitioner (CSP) SAQA ID 601, and COMENSA Master Practitioner (CMP) SAQA ID 602. COMENSA accredits its members upon completion of a minimum number of hours of coach-specific training; providing evidence of a minimum number of hours of one-to-one and/or group and/or team coaching, supplying references from a minimum of three separate clients, successful completion of an online questionnaire and being in, or committed to, supervision. COMENSA has a code of conduct applicable to all members and facilitates continuous professional development of its members. The number of certified coaches accredited with COMENSA is unknown.

Institute of Business Advisors of Southern Africa (IBASA) - is a SAQA recognised non-statutory professional body ID 818, start date 27 September 2017, recorded as IBA. IBASA has three registered professional designations namely: Business Advisor (BA) ID 336, Principal Business Advisor (PBA) ID337 and Certified Business Advisor (CBA) ID 338 – in order of competence level from lowest to highest. IBASA grades its members in the generalist and specialist categories according to weighted scores obtained in the assessment areas of academic qualifications, work experience, business advisor experience and membership of recognised professional bodies. IBASA has a code of conduct applicable to all members and facilitates the provision of mentoring from senior to junior designations and continuous professional development.

Institute of Management Consultants and Master Coaches South Africa (IMCSA) - is a SAQA recognised non-statutory professional body ID 964, start date 30 July 2015, recorded as IMCSA. IMCSA has two registered professional designations namely: Certified Management Consultant (CMC), SAQA ID 627, and Certified Master Coach (MC), SAQA ID 628 with structured developmental pathways for each, moving from Associate, to Member to Certified Member.

IMCSA was founded in 1972 and is the professional body representing management consultants and business, executive and leadership coaches. IMCSA is a founding member of the International Council of Management Consulting Institutes (ICMCI) which is an international body which sets standards in these professions. The ICMCI is registered with the United Nations as an NGO and has partnered with ISO with respect to ISO 17024 and ISO 20700.
IMCSA also accredits training providers, practices and training programmes which fall within its ambit, according to international standards which are assessed every three years by the ICMCI.

IMCSA provides training opportunities and sets and maintains standards for business consultants and coaches in South Africa. Members of IMCSA includes those employed by its Accredited Consulting Practices. The IMCSA has two distinct professional competency standards relating to Management Consulting and Coaching.

4.3 Professional Bodies - Specialised

Some members of specialised professional bodies that, in addition to their specialised professions, also provide business advice to their clients and are mostly from the accounting profession and include, amongst others:

**Association of Accounting Technicians – SA (AAT(SA))** - is a SAQA recognised non-statutory professional body ID 846, start date 15 March 2013, recorded as AAT(SA). The AAT(SA) has three registered professional designation namely: Public Sector Member PMAAT(SA) SAQA ID 799, Member of AAT(SA) MAAT(SA) SAQA ID 459 and Fellow Member of AAT(SA) FMAAT(SA) SAQA ID 460.

**Association of B-BBEE Professionals (ABP)** - is a SAQA recognised non-statutory professional body ID 1002, start date 28 July 2016, recorded as ABP. ABP has one registered professional designation namely: Economic Empowerment Professional (EEP) ID 720. ABP aims to facilitate the accreditation of qualifying BEE Verification Agencies and guides the development of the industry by standardizing the ratings methodology and setting the standards for ethical behaviour and professional development.

**Association of Chartered Certified Accountants South Africa (ACCA)** - is a SAQA recognised non-statutory professional body ID 896, start date 27 December 2018, recorded as ACCA. The ACCA has two registered professional designations namely: Fellow Chartered Certified Accountant SAQA ID 542 and Associate Chartered Certified Accountant SAQA ID 543.

**Direct Marketing Association of South Africa (DMASA)** - is a SAQA recognised non-statutory professional body ID 827, start date 26 October 2017, recorded as DMASA. DMASA has three registered professional designations namely: Interactive and Direct Marketing Practitioner (IMDPrac) ID 399, Interactive and Direct Marketing Professional (IMDPro) ID 3400 and Master of Interactive and Direct Marketing (MIDM) ID 401. DMASA is dedicated to the protection and development of the Interactive and Direct Marketing (IDM) industry. DMASA has a code of conduct applicable to all members.

**Independent Regulatory Board for Auditors (IRBA)** - is a SAQA recognised statutory professional body ID 875, start date 12 September 2018, recorded as IRBA. IRBA has one registered professional designation namely: Registered Auditor, SAQA ID 522.

**Institute of Accounting and Commerce (IAC)** - is a SAQA recognised non-statutory professional body ID 835, start date 26 October 2017, recorded as IAC. IAC has seven registered professional designation namely: Technical Accountant (TA) SAQA ID 450,

**Southern African Institute for Business Accountants (SAIBA)** - is a SAQA recognised non-statutory professional body ID 874, start date 26 July 2018, recorded as SAIBA. SAIBA has four registered professional designations namely: Business Accountant in Practice SAQA ID 520, Business Accountant SAQA ID 521, Certified Financial Officer (SA) SAQA ID 631 and Certified Business Accountant (SA) SAQA ID 769.

**South African Institute of Chartered Accountants (SAICA)** - is a SAQA recognised non-statutory professional body ID 651, start date 27 September 2017, recorded as SAICA. SAICA has three registered professional designations namely: Chartered Accountant CA (SA), SAQA ID 8, Member Accounting Technicians MAT (SA) SAQA ID 981, Fellow Member Accounting Technicians FMAT (SA), SAQA ID 982.

**South African Institute of Professional Accountants (SAIPA)** - is a SAQA recognised non-statutory professional body ID 840, start date 26 October 2017, recorded as SAICA. SAICA has one registered professional designation namely: Professional Accountant (SA) SAQA ID 445.

**South African Restructuring and Insolvency Practitioners Association (SARIPA)** - is a SAQA recognised non-statutory professional body ID 1111, start date 9 March 2018, recorded as SARIPA. SARIPA has two registered professional designations, of which one is relevant to the business advising ecosystem, namely: Business Restructuring Professional SAQA ID 901.

**Turnaround Management Association Southern Africa (TMA)** - is a SAQA recognised non-statutory professional body ID 1072, start date 26 October 2017, recorded as TMASA. The TMA has three registered professional designations namely: Associate Turnaround Practitioner SAQA ID 850, Certified Turnaround Practitioner SAQA ID 851 and Professional Turnaround Practitioner SAQA ID 852.

Note: There are many more bodies that have some impact on this discussion paper, for example:
- Project Management South Africa (PMSA).
- South African Auditor Training and Certification Authority (SAATCA)
- Association of Project Management in South Africa (APMSA)
- The Institute of Bankers of South Africa (IOBSA)
- Institute of Directors of South Africa (IODSA)
All of which represent professionals who also advise in their functional specialisation.

**4.4 Trade and Industry**

**Department of Trade and Industry (dti)** - is primarily overseeing industrial development, trade- and investment promotion, but also provides strategic direction in
the development of policies and strategies for promoting enterprise growth, empowerment and equity, with an emphasis on empowering youth- and women-owned businesses.

**Industrial Development Corporation (IDC)** - provides both financial and non-financial business support to emerging and established businesses with a view to enhance the industrial development capacity and promoting entrepreneurship. The IDC is structured according to its preferred focus sectors and reports to the dti.

**South Africa Bureau of Standards (SABS)** - is a statutory body that was established in terms of the Standards Act, 1945 (Act No. 24 of 1945) and continues to operate in terms of the latest edition of the Standards Act, 2008 (Act No. 8 of 2008) as the national standardisation institution in South Africa, mandated to: develop, promote and maintain South African National Standards (SANS); promote quality in connection with commodities, products and services, and render conformity assessment services and assist in matters connected therewith.

**South African National Accreditation System (SANAS)** - is established in terms of Section 3(1) of the Accreditation for Conformity Assessment Calibration and Good Laboratory Practice Act, 2006 (Act No. 19 of 2006). SANAS provides accreditation services to conformity assessment service providers in South Africa. In terms of the act SANAS’s primary role is to serve the national and public interest by facilitating the provision of a reliable internationally recognised accreditation infrastructure to government, industry and the wider community. Its scope covers: Testing laboratories; Calibration laboratories; Certification bodies; Inspection bodies; Proficiency testing schemes, and Certified reference material.

SANAS has its office at the Department of Trade and Industry (the dti) Campus, Sunnyside, Pretoria, South Africa. It is directed and legally represented by a Board of Directors, whose members are appointed by the Minister of Trade and Industry.

**National Empowerment Fund (NEF)** - is directed at promoting and facilitating black economic participation in the economy by providing financial and non-financial support to black empowered businesses and promoting a culture of savings and investment among black people. The NEF provides business loans across all industry sectors, for start-ups, expansion and equity acquisition purposes. The NEF is an agency of the dti.

**National Youth Development Agency** - National Youth Development Agency (NYDA) provides direct services to the youth in the form of e.g. mentorship, skills development and training and entrepreneurial development and support.

### 4.5 Small Business Development

**Department of Small Business Development (DSBD)** - focuses on enhanced support to small business, including cooperatives, with an emphasis on programmes to advance entrepreneurship amongst women, the youth, and people with disabilities to contribute to job creation and economic growth.

The DSBD pursues the following objectives:
- facilitating the development and growth of small businesses to contribute to inclusive and shared economic growth and job creation through public and private sector procurement.
- facilitating partnerships with all spheres of government as well as the private sector to ensure mutual cooperation that will benefit small businesses and cooperatives.
- advocate for a conducive regulatory environment for small businesses and cooperatives to enable access to finance, investment, trade equitable and market access in an and sustainable manner.
- facilitating radical economic transformation through increased participation of small businesses cooperatives in the mainstream economy.

**Small Enterprise Development Agency (Seda)** - is mandated to implement government's small business strategy, design and implement a standard and common national delivery network for small enterprise development and integrate government-funded small enterprise support agencies across all tiers of government. Seda is the agency, which employs most (up to 175) business advisors and contracts most independent business advisors in its service delivery to small businesses. Seda has 52 branches and 30 co-locations nationally and has the largest footprint for a government funded agency. Seda also partners with 75 independent incubation centres. Seda delivers training and technical (non-financial) support to small businesses and is the custodian of a network of incubators across sectors. Seda reports to the DSBD.

**Small Enterprise Finance Agency (Sefa)** - is mandated to foster the establishment, survival and growth of small businesses through the provision of finance, and thereby contributing towards poverty alleviation and job creation. Sefa provides financial support to small businesses (including e.g. asset finance, bridging finance, revolving loans, term loans and guarantees) directly and indirectly through commercial banks, intermediaries, joint venture, partnerships (Specialised Funds) and other collaborative relationships to extend Sefa's reach. Sefa reports to the DSBD.
Figure 3. National Regulatory Role Players

- **Post School Education and Training (PSET)**
  - Executive Authority: Minister of Higher Education and Training

- **Trade and Industry**
  - Executive Authority: Minister of Trade and Industry

- **Small Business Development**
  - Executive Authority: Minister of Small Business Development
5. **LEGISLATIVE / REGULATORY ENVIRONMENT**

This section reflects legalisation and policies that have bearing on the future structure of Business Advisory Services (BAS) and Business Development Services (BDS).

There exists an inconsistency in respect of the legal framework within which the BDS (including BAS) ecosystem operates. On the one hand, the education and training environment is highly regulated with reference to the post school education and training (QCTO, SAQA and Seta) landscape. On the other hand, apart from the generic provisions of the Companies Act (which is applicable to all businesses) there are no regulations pertaining to the BDS (BAS) provision ecosystem. The Consumer Protection Act 68 of 2008 should also be considered in the scope of this discussion.

5.1 **Post School Education and Training**

**Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act (Act 19 of 2006)** - The purpose of the Act is to provide an internationally recognised and effective accreditation and GLP compliance monitoring system for South Africa. The Act recognises SANAS as the only accreditation body in the country for conformity assessment and calibration, and monitoring GLP compliance to OECD principles.

**Adult Basic Education and Training Act (Act 52 of 2000)** - The act exists among others to provide for quality assurance and quality promotion in adult education and training, and to provide for the registration of private adult learning centres.

**Higher Education Act (Act 101 of 1997)** - The act exists among others to provide for the appointment and functions of an independent assessor; to provide for the registration of private higher education institutions; to provide for quality assurance and quality promotion in higher education.

**National Qualifications Framework Act (Act 67 of 2008)** - The National Qualifications Framework Act requires SAQA to: (i) develop and implement policy and criteria for recognising a professional body and registering a professional designation for the purposes of this Act, after consultation with statutory and non-statutory bodies of expert practitioners in occupational fields and with the Quality Councils (QCs); and (ii) to recognise a professional body and register its professional designation if the criteria contemplated in subparagraph (i) have been met.

**Skills Development Act (Act 97 of 1998)** - The act exists among others to provide for learnerships that lead to recognised occupational qualifications; to provide for and regulate employment service. The skills development act refers throughout to international best practice.

**Skills Development Levies Act (ACT 9 of 1999)** - The act exists to provide for the imposition of a skills development levy.
Further Education and Training Colleges Act (Act 16 of 2006) - The act exists among others to provide for the regulation of further education and training; to provide for the registration of private further education and training colleges; to provide for the promotion of quality in further education and training.

South African Qualifications Authority Act, 1995 (SAQA) (Act 58 of 1995) - The Act exists to provide for the development and implementation of a National Qualifications Framework and for this purpose to establish the South African Qualifications Authority.

Standards Act, (Act 8 of 2008) - To provide for the development, promotion and maintenance of standardisation and quality in connection with commodities and the rendering of related conformity assessment services; and for that purpose to provide for the continued existence of the SABS, as the peak national institution

Policy and Criteria for Recognising a Professional Body and Registering a Professional Designation for the Purposes of the National Qualifications Framework Act 67 of 2008 - This Policy and Criteria outlines the manner in which SAQA recognises statutory and non-statutory professional bodies for the purposes of the NQF Act (Act 67 of 2008) as well as the manner in which professional designations from recognised professional bodies are registered on the NQF by SAQA. In terms of the regulation, a body constituted to represent and/or regulate a recognised community of expert practitioners shall be recognised by SAQA as a professional body on fulfilment of the criteria for recognition as a professional body.

5.2 Small Enterprise Development

The National Small Business Act, (number 102 of 1996), as amended, only makes reference, in the definition section of the Act, to “service providers” meaning any public or private entity providing support services to small business, but nothing more. The Act, however, tasks Seda to “strengthen the capacity of service providers to support small business”.

The Act, furthermore, defines the small enterprise as a beneficiary group at which BDS (BAS) services are directed, recently adapted by the previous Small Business Development Minister Lindiwe Zulu.

There are two metrics, which determine the size of a business: the number of employees (full time paid employees), and total annual turnover.

- Micro enterprises can have a maximum of 10 employees, small enterprise between 10 and 50 employees, and medium-sized enterprises can have up to 250 employees.
- Turnover ceilings range from R220 million for a wholesale company to qualify as a medium-sized enterprise, to R85 million for a catering business to qualify as a micro enterprise. Here are the new turnover ceilings for each class of business, as broken down into sectors by the small business development department.

The Department of Small Business Development (DSBD) is in the process of revising the National Small Enterprise Act, number 102 of 1996, as amended.
This exercise further recognises the importance of the professionalisation of business advisory services and should be guided by this paper as to how best to professionalise this fundamental service within the small enterprise development ecosystem.

The DSBD has identified an opportunity to address and professionalise business advisory services in the form of policy provision and oversight over the sector. The aim is to strengthen the regulation through the various organisations’ codes of ethics to ensure accountability.

**Kenya**'s accreditation and licensing of business development service providers is worth mentioning. Kenya’s legislation is unique in providing for the regulation and licensing of business development services providers serving micro and small enterprises.

**Korea** – The Korean government has established IMCKorea to deal with the consulting profession in Korea. The aim of these regulations is to effectively administer the compliance training, evaluation, certification, and others for ICMCI CMC in accordance with the standards of ICMCI in Korea. – source: [http://www.imckorea.or.kr](http://www.imckorea.or.kr)

**Austria** – has licensing requirements for professional services. The Austrian Federal Economic Chamber (de: Wirtschaftskammer Österreich or WKO) functions as the federal parent organization for the nine State Chambers and 110 trade associations for different industries within Austria's system of economy. Most State Chambers and associations have local offices to provide services in close proximity to members. Compulsory membership by Austrian federal law is automatic with obtaining the operating license of the company and thus includes all Austrian companies in operation. The complete WKO list of regulated trades is long and covers everything from electricians to consultants. Consultants are registered under the ICMCI affiliated body called the Austrian Professional Association of Management Consultancy, Accounting and Information Technology (UBIT).

Other countries have preferential supply agreements with their governments (E.g. Canada), whereby preference is given to Certified Management Consultants.

Research has shown that most countries opt for a self-regulated environment and allow the market to regulate supply and demand.

**In the South African context**, where questions continue to be raised about the universal quality of business development services, particularly business advising, the above are worth noting.

### 5.3 Business Development Services Draft Policy

The Department for Small Business Development has started the process of developing a policy framework for Business Development Services, which is currently in draft format. The framework envisages registering BDS and developing minimum standards and code of conduct. This policy is at version 7 and awaiting the finalisation and incorporation of comments. Seda has already adopted an incubation policy which was ratified by the board on 3rd October 2018.

The DSBD notes that there are a variety of actors within the BDS ecosystem, each playing a different function and role within the ecosystem. These differences are important to note and understand, but similarly they are market and policy driven. Given the situation, it is
imperative that curricula or methodologies not be prescribed, as these can be updated or no longer used by the market participants simply because research is regularly highlighting new methodologies or variations on existing methodologies. Therefore, any prescription will become outdated within a short space of time and be counter-productive to the industry.

*Rationale*

The motivation for the framework is to ensure that:

(i) BDS ecosystem role players are given a clear understanding of national economic objectives, including the targeted sectors within which they must develop the nation’s SMMEs, and

(ii) to ensure that the BDS ecosystem role players are competent and meet minimum standards, without reducing the freedom to be innovative and competitive on a global basis.

*Purpose of the policy framework*

According to DSBD, the purpose of the policy framework is to define an ecosystem for the business development services sector, and the necessary criteria for monitoring, evaluation and learning purposes.

*Regulation of BDS*

The DSBD is in favour of a self-regulatory environment for BDS. The intention is to provide a registry of all individuals and businesses operating within the BDS space in order to facilitate industry and state access to suitable organisations and individuals.

*Monitoring, Evaluation and Learning*

The DSBD intends to provide guidance to BDS providers through clearly defined Monitoring, Evaluation and Learning (MEL) assessment criteria, against which the BDS (BAS) providers must report on a regular basis, and which will form the basis for their ongoing registration as a BDS provider.

The MEL tool will constitute a critical instrument for oversight over BDS providers’ compliance with the policy framework. The MEL will probably be administered by DSBD as an oversight body – through Seda according to guidelines issued by the department. Seda will be responsible for collecting the MEL data, analysing the data and reporting the findings and recommendations to the DSBD. Furthermore, Seda will advise BDS providers who are in breach of the policy of said breach, the reason for the breach, the consequences thereof, and the remedies required to reinstate the BDS provider’s registered status.

6. **SUPPLY ENVIRONMENT**

6.1 **Types of Suppliers**

In understanding the supply environment, the first important distinction is that of Business Advisory Services (BAS) and Business Development Services (BDS). Some role players perceive this distinction to be superficial in nature given that business advisors, in practice, offer advice and applied learning, and often render actual services.
The figure below seeks to illustrate this relationship.

![Diagram](image)

**Figure 4 - Business Advisory Services as a Component of BDS**

Figure 5 below seeks to differentiate suppliers to the entrepreneur as an individual versus suppliers to the business itself.

The focus in this discussion paper is on suppliers to emerging and small businesses (versus big businesses or Corporates).

The business coach typically focuses on the individual or group of individuals but can also offer services to the business.

Business mentors, business advisors, business consultants and management consultants can provide BAS to emerging and small business. However, the focus needs to be on Leadership or Management for the required impact to be realised.
Notes: There is no difference between a business consultant and management consultant, so the terminology utilised is shortened to Consultant or Advisor. There is no specific definition which restricts a business advisor to a small business or a management consultant to a corporate business. Concepts that have been introduced in the comprehensive competency framework are sector/ company size/ company lifecycle – see Figure 11. Coaches and mentors also work in the corporate field and work with both individuals and groups. A specialist is not exactly the same as a generic advisor and may have only one specialism.

6.2 Supply institutions across constituencies

There are thousands of business advisors operating within South Africa. The exact number is not known as there is no consolidated national database and no formal research has been conducted into this sector.

There are hundreds of entities/ agencies/ intermediaries on the supply and demand side across constituencies that have their own cohort of generalist and specialist business advisors, in-house and or subcontracted, aligned to the nature of their business.

The intermediaries and agencies do operate in tandem or individually. However, the supply of BAS services is rather fragmented, with significant duplication between them.

Some of these agencies also make use of the same pool of business advisors / business consultants / business coaches in providing BAS to small businesses.

All these institutions appear to experience the same frustrations in their utilisation of BDS (BAS) providers, including:

**Figure 5 - Linking Supply and Demand Levels**

<table>
<thead>
<tr>
<th>Demand Side</th>
<th>Entrepreneur</th>
<th>SMME</th>
<th>Corporate</th>
<th>Agency</th>
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</thead>
<tbody>
<tr>
<td>BAS</td>
<td>Coach</td>
<td>Coach</td>
<td>ESD consultant</td>
<td>Coach</td>
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<td></td>
<td>Mentor</td>
<td>Mentor</td>
<td>Market researcher</td>
<td>Mentor</td>
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<td>Advisor</td>
<td>Advisor</td>
<td>Consultant</td>
<td>Advisor</td>
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<td></td>
<td>Consultant</td>
<td>Consultant</td>
<td>Specialist</td>
<td>Consultant</td>
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<tr>
<td></td>
<td>Trainer / facilitator</td>
<td>Trainer / facilitator</td>
<td>Implementer</td>
<td>Trainer / facilitator</td>
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<table>
<thead>
<tr>
<th>BDS</th>
<th>Group training</th>
<th>Group training</th>
<th>Group training</th>
<th>Providing capacity to their identified ESD candidates</th>
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<tbody>
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<td>Capacitation</td>
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<td>Group Coaching</td>
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Provide their own or partner/ outsource
- Service provision varies from poor to excellent.
- Many advisors lack experience and need to be micromanaged.
- The lack of a disciplinary code or practice results in the inability to weed out poor service providers.
- There is a lack of both process and operational (outcomes) standards in advisory services. This may in many cases be due to the lack of application of such standards rather than the lack of standards.
- There is a lack of standardised metrics against which impact measurement and monitoring of BAS service delivery can be done.
- Many of the agencies lack experience in the processes of procurement, monitoring and evaluation of BDS (BAS) providers, resulting in poor service delivery and missed objectives/ outcomes. This may be further exacerbated by the practice of accepting the lowest quote from service providers.

**Government**

Agencies within the government sphere are found on all three levels of government, of which some are acting as intermediaries and others as direct implementers. The following can serve as examples:

- **National government level**: agencies such as IDC, NEF, NYDA, Seda and Sefa. They do however have different criteria such as focus, project size and budget in some cases.
- **Provincial government level**: at least one “parastatal” development institution per province, dedicated to supporting small business. See Figure 7 below.
- **Local Government level**: there are multiple agencies at the local government level which are tasked with the promotion of enterprises within local boundaries. Most of the metropolitan municipalities have dedicated small business development programmes, e.g. the City of Tshwane and the City of Ekurhuleni SMME Development programmes.

**Figure 6. Provincial Growth and Development Agencies providing institutional support for small businesses**
The agencies listed above may address different needs such as the sourcing of funds, provision and or procurement of advisory services, market facilitation, training, coaching, technical support, facilities and more. These agencies may implement programmes and interventions using own resources or through intermediaries. In addition, they may provide funding themselves from own funds or facilitate funding from third party funders.

**Corporate**

Many corporates offer services, programmes and opportunities for SMMEs via corporate social investment, supplier development and enterprise development initiatives. The services provided could vary from fully fledged incubators to skills development programmes.

There are clear incentives for corporates to focus on specific programmes which comply with the B-BBEE codes. The Competitive Supplier Development Programme (CSDP) was launched in 2007 by the Department of Public Enterprises. The principles highlighted in this programme provide insight into the rationale behind Supplier Development in South Africa, outline their importance and explain the thinking behind developing a Supplier Development Plan.

**Corporate intermediaries** are mostly CSI and/or ESD funded and include e.g. Anglo American's Zimele Development Programme and Sasol’s Enterprise and Supplier Development Programme.

**Non-Profit**

There are many Non-Profit Companies (NPCs), Non-Governmental Organisations (NGOs), and Non-Profit Organisations (NPOs) which provide services to SMMEs. For example, the National Mentorship Movement (NMM) seeks to identify 100,000 mentors to assist SMMEs with free mentoring services. The NGO sector, which is donor driven, includes examples such as the German based GIZ, SEED, USAID, UNDP and EU. Some of the programmes are sectoral specific, e.g. direct small business support to eco-inclusive enterprises whilst others are specific to e.g. rural areas. The ICMCI is registered with the UN as an NGO and has initiated many programmes and initiatives in this sector across the world.

**For Profit**

There are many for profit incubators, accelerators, sole practitioners, consortiums, networks and firms that provide BDS and BAS to SMMEs. Some of these receive funding from corporates and public sector, whilst others provide services for profit and fund their own operations.
7. STRATEGIC FRAMEWORK AND CURRENT STATUS

Four main strategies for improving the quality of Business Advisory Services in South Africa are explained and discussed below. The status quo and the relationship between these strategies is presented. Different perspectives and considerations are put forward for further debate and discussion.

Figure 8 below provides a visual starting point. Any combination of these strategies can be considered.

**Figure 7. Relationship between strategies for improving the Quality of Business Advisory Services**

The block addressing professionalisation includes ISO 17024 but many statutory professional bodies do not use 17024, whereas some self-regulated bodies voluntarily comply with 17024 and adhere to all of its requirements.

The education and training area should address recognised professional bodies which have accredited training practices and courses as an alternative, because in some cases there are also partnerships with FET and CHE institutions, plus the formal CPD process which are already in place.

ISO 20700 covers, ethics, governance, competence of the provider, monitoring and evaluation etc. It could be adopted as a very sound guideline for the development of a small business advisory standard for service delivery.

7.1 Regulation versus Self-Regulation

A Regulatory Body is a government authority, public agency or public entity responsible for exercising authority over a prescribed mandate delegated by law pursuant to statute. Regulatory authorities are commonly set up to enforce safety and standards and or to protect consumers. They exist to promote and protect public interest and not the professional members.
They establish, develop, maintain and enforce standards of qualification, practice and conduct and have powers that may require companies or professionals operating within a specific industry to adhere to certain standards or deliver a set of outputs.

**Regulatory bodies may:**
- Require companies or professionals to obtain a license
- Establish pricing controls
- Require transparency of information
- Set service levels
- Monitor performance and compliance with service levels and codes of conduct
- Investigate complaints
- Undertake enforcement action, such as directing compliance through orders, imposing financial penalties and or the revoking of a license.

Regulation in this context can be through a **mandated public agency or statutory professional body.**
- A public agency may either assume the role of overseeing other organisations/bodies or individual/professionals.
- A statutory professional body may operate in conjunction with existing non-statutory professional bodies. Roles, responsibilities and relationships between organisations/bodies would need to be clarified.

Whatever the mechanism/s, the intention of regulation is mandatory registration and issuing of a licence to practice as a business advisor. The degree to which standards of practice and education and training are prescribed, and the extent to which monitoring and enforcement of public interest is guaranteed, may vary.

The costs and benefits of a highly regulated industry need to be carefully considered.

In 2012, Seda, with funding and technical support from SECO, conceptualised the design of a National Business Development Service Provider (BDSP) Quality Assurance and Support Initiative (QASI) referred to as B-QASI. This initiative sought to establish an independent entity that would register and assess providers, develop capacity to address supply gaps, and monitor and report on the performance of Business Development Service providers. The initiative was never implemented.

The DSBD has most recently expanded on the above, through the development of the BDS Policy Framework discussed above. This policy framework intends to establish and maintain a registry of all individuals and businesses operating within the BDS space. This includes all categories of business advisors whether operating within an incubator, accelerator, skills development provider or independently. The institutional mechanisms for registration, monitoring, reporting, evaluation and enforcement should be clearly set out.

The current status is that there are several considerations and emerging developments in public policy but institutional mechanisms to fulfil regulated functions remain unresolved. There is also no statutory professional body in existence. Industry stakeholders have
expressed a preference for self-regulation over regulation. The question is how this is to be implemented, with what resources and at what cost.

7.2 Professionalisation

Professionalisation is the process and mechanism whereby an industry is professionalised.

A professional body serves as the impartial, autonomous representative of its various stakeholders in matters related to the discipline."

It has multiple facets, such as:

- providing a platform for a common voice
- providing member benefits
- advising on rates
- awarding designations or certifications
- offering mediation and arbitration services
- setting performance and other standards
- offering an advocacy and marketing service for the professionals

Professional bodies play a critical role in quality assurance and standards development within professional occupations.

Note: it is critical to distinguish between standards for individual competency and service delivery.

The four types of professional bodies may be grouped in **two primary groupings of professional bodies** – statutory and non-statutory.

Statutory professional bodies are established through an Act of Parliament and govern the practice of specific occupations.
Non-statutory professional bodies offer voluntary membership and self-regulation and "create an enabling environment for professional development in a discipline and growing the maturity of that discipline by contributing to its body of knowledge, its relevance, governing principles and accessibility to new and existing practitioners.

Statutory professional bodies are regarded as ‘regulation’ and non-statutory professional bodies as 'self-regulation' which is an important distinction.

Currently there is no statutory professional body for the business advisory services industry. There are however many non-statutory professional bodies either for generic or specialised disciplines as profiled in section 3.2. Some industry stakeholders have been advocating for the establishment of a federation of non-statutory professional bodies and this has been tried previously without success in the form of the Federation of Professional Management Organisations (FPMO).

SAQA’s role in professionalisation

SAQA recognises and monitors professional bodies and registers professional designations in accordance with its "Policy and Guideline for recognising a professional body and registering professional designation for the purposes of the National Qualifications Framework Act, No 76 of 2008 as amended". Note: The SAQA recognition addresses professionalisation and the related standards (e.g. ISO 17024) but does not address the service delivery standard (e.g. ISO 20700)

The objectives of the SAQA policy and guideline include

- Promoting public trust in professions through a nationally regulated system of recognition and
- Registration and promoting protection of the public from malpractice relating to the fulfilment of professional duties and responsibilities.
- Professional bodies are required to encourage the development of Continuing Professional Development (CPD) but may not be accredited or registered as an education and training provider. This means that the professional bodies may accredit training providers under its auspices and potentially according to international standards.

Key criteria for the recognition of a professional body by SAQA are that it shall inter alia:
- be a legally constituted entity with resources, governed by a constitution or similar and compliant with good governance practices
- protect the public interest in relation to services provided by its members and the associated risks
- develop, award, monitor and revoke its professional designations in terms of its own rules, legislation and/or international conventions
- set criteria for, promote and monitor CPD
- publish a code of conduct and investigate alleged contraventions; see also ISO 20700 4.4.3 or policy 3, which also addresses this point.
SAQA may remove the recognition status from a professional body and may deregister a professional designation, if no longer compliant with the Policy and Criteria.

**The International Standard ISO 17021** titled "Requirements for Certification Bodies" is intended for use by Certification Bodies (CBs) that carry out audit and certification of management systems. It gives generic requirements for such CBs performing audit and certification in the field of quality, environmental and other forms of management systems. This standard is informally applied by SAQA and the ICMCI – this is typically seen as compliance as opposed to certification. There is substantial overlap between ISO 17021 and the SAQA requirements.

**The International Standard ISO/IEC 17024** titled "Conformity assessment — General requirements for bodies operating certification of persons" published in 2012 is a global, voluntary benchmark for organisations such as professional bodies to apply in professional certification. It provides guidelines on establishing a professional standard and maintaining a professional certification process in line with said standard and addresses critical aspects such as independence, confidentiality, impartiality and potential conflicts of interest.


**Specifically, a professional standard should include the following:**

1. A formal body of knowledge
2. A competency framework – against which the standard is measured. This competency framework should only be mapped for one designation at a time.
3. Defined entry criteria and a professional code of conduct
4. An independently verified process whereby the standard is applied to each designation, which typically includes the production of a portfolio of evidence.
5. Ideally, a statement of preferred assessment or verification techniques
6. Defined levels of competence, equating to a progression pathway
7. An Appeals process should the process be deemed to be unfair or prejudicial
8. A process whereby membership may be revoked for specific reasons

These standards are primarily aimed at determining the entry criteria and ongoing quality of the practitioners as individuals.

Some of the professional bodies have mature competency frameworks that are aligned with International Standards whilst others are starting to develop them. Competency frameworks are a key part of a standard and input to the assessment and grading of members against registered professional designations, when used in conjunction with a formal application process, which may include assessments and/or examinations. Competency frameworks can also be used to develop progression pathways allowing for vertical progression within a profession, when aligned with a concept titled competency depth.
Figure 9 - The consulting competency framework

Functions and roles versus Professions

Professionalisation is the process through which professionals obtain professional certification from a recognised professional body for a registered professional designation.

The competency framework for Advisors distinguishes between Professions and Functions or Roles. There is a related competency framework for Coaches. No specific competency framework exists for mentors. During discussions with various representatives of the mentoring fraternity, it was agreed in principle that mentors have the combined competences of consultants and coaches.

In addressing the gap between supply and demand of BAS, there is an emphasis on the progression pathways of new entrants to the professions under discussion. Competency depth is a critical concept for the execution of a strategy to develop more BAs.

Competency depth may be defined as follows:
1. Initial – Learner
2. Independent – able to operate without supervision
3. Mastery – can lead others in practice and model best practice
4. Industry Leader – develops new policies, innovations and practices

Lower level qualifications and courses should be seen to address the “Initial” requirements and further development could be by means of “blended learning” approaches, which combine, self-study, formal learning, informal learning and mentoring/ coaching programmes. Mentoring/ Coaching programmes are also termed “Shadowing” in Seda and other agencies.
7.3 Standards for delivery of BAS

There are two primary types of standards relevant to this discussion paper, namely:

1. Competency and ethical standards relating to the individual advisor and
2. Standards relating to the delivery of Business Advisory Services (BAS).

It is clear that the second is very dependent on the first. This section focuses on the standards relating to the latter.

The International Standard ISO 20700 "Guidelines for Management Consultancy Services" developed by the ICMCI in collaboration with ISO and published in 2017 provides principles and procedures for contracting, execution and closure of management consultancy services, promoting best practice and ethical behaviours in the delivery of value.

![Figure 10 - The ISO 20700 Standard Explained](image)

ISO 20700 "applies to all MCSPs, whatever their size or specialism, including sole proprietors, partnerships, associations, governmental and non-governmental organizations, internal departments of corporations, etc."

It does not document or prescribe specific methods and approaches but does require that the approach and workplan (section 5.5.1) is agreed between the client and consultant. It addresses key aspects of client acceptance, accountability, regulatory compliance, stakeholder engagement, governance, capability, communication, confidentiality, intellectual property, social responsibility, health and safety, and risk and quality management.

ISO 20700 provides guidelines for the process of providing management consulting and delivering services to clients. It does not dictate specific methodologies or approaches, but it requires the agreement of standards and deliverables, between the provider and the client. It also refers to other applicable standards that should be applied as described in sections 4.4.3 to 4.4.6, which describe adherence to an ethical code of conduct and very importantly, the requirement to maintain appropriate levels of competence throughout.
the assignment. (4.4.6 relates to the standard of the professional on the assignment and can be tied back to the concept of certification and CPD discussed above)

In the self-declaration checklist, which was developed as a guideline, there is an allowance for small medium and large projects, whereby the formality varies.

**There are different perspectives amongst industry stakeholders as to the application, scope and adequacy of this standard.**

1. One perspective is that this International Standard is adequate for the South African context and is applicable to Corporate and small business clients. The ICMCI has expanded the standard to address small, medium and large projects by means of its self-declaration checklists and associated training programmes, which are represented by the IMCSA in South Africa.

2. Another perspective is that this International Standard provides a useful starting point but should be simplified particularly for the small business sector and strengthened to include outcomes applicable to emerging and small business clients. This view is merely a modification of the first and implies the need for explanatory notes and guidelines that can be used to standardise approaches in the South African context.

There are also different perspectives regarding the scope of application of such standards to business advisory services and business development services. ISO 20700 addresses the delivery of professional services.

The scope statement says under section 1. that “this document provides guidelines for the effective delivery of management consultancy services”. Understanding that management consultancy, business consultancy and business advisory services are synonyms for each other and that the providers can choose which market sector (industry) and size (small, medium, large) they operate in.

The development of a national standard requires balanced stakeholder representation from consumers, government, regulators, non-profits, academia, labour, industry and SMMEs, informed by principles of a project approach, market relevance, coherence, transparency and consensus.

**There are several stages in the formal standards development process:**

Early stages include a project proposal, value add assessment, project approval and working group establishment. This seems to have been achieved through the coordination by SEED in 2017 referred to in section 1.2. This process has already been undertaken in the development of a global ISO 20700 standard and has taken about 8 years to complete.

The DSBD proposal to the SABS for the development of a national standard was approved and technical resources to assist the working group were allocated from the SABS. This process is currently under way, but no formal recommendations have been made.

Key components of the standard were identified through stakeholder consultation in line with ISO 20700.

To continue, the process requires formalisation through the SABS, consideration of representativeness and completion of the subsequent stages that is producing a draft standard, committee consideration, public enquiry, approval and publication.
The majority of industry stakeholders seem to be supporting the need for a South African National Standard for the delivery of business advisory services. This standard may simply be in the form of the adoption of 20700 with specific guidelines for its application in BAS, in South Africa.

In the context of BAS, SANAS could provide accreditation and oversight to professional bodies to ensure compliance with prescribed standards. It should be noted that this could provide yet another layer of cost and overheads to the process. This function is not the same as recognition and designation of professional bodies, as this is the function of SAQA.

The simpler route would be to adopt ISO 20700 as a starting point, develop the guidelines for COMPLIANCE (not conformity) and to initiate the process immediately.

7.4 Education and Training

Occupations

The Department of Higher Education and Training (DHET) uses the OFO (Organising Framework for Occupations) as the tool for identifying, reporting and monitoring skills demand and supply within the South African Labour Market. SETAs, through their Sector Skills Planning and stakeholder engagement, can make submissions twice a year to the DHET to recommend amendments to the OFO.

The OFO is a coded occupational classification system that categorises similar jobs into occupations. These occupations are further classified into broader groups at different levels based on similarity of tasks, skills and knowledge. The eight Major Groups denoted by 1-digit codes cascade down to Occupations denoted by 6-digit codes.

The value of developing a common language for occupations and linking occupations to qualifications is that it can be used to facilitate progression pathways as both are based on competencies. This in turn links to professional designations. Alignment between the OFO and NQF as these frameworks are developed and updated over time becomes important for managing the supply and demand of skills.
Figure 11. Comparison between the skill level of occupation groups and the NQF and NDSD level

Note: the NQF level 4 and 5 qualifications should be aligned with the entry level designations of the appropriate professional bodies and graduates should still work under supervision until attaining the required level of experience and competence.

The OFO registered occupation for business advisory services is code 2017-242101 ‘Management Consultant’ (note again when differentiating arbitrarily between the definitions) described as ‘Assisting organisations to achieve greater efficiency and solve organisational problems’.

Aggregated occupational categories are as follows:
- Unit Group: 2017-2421 ‘Management and Organisation Analysts’
- Minor Group: 2017-242 ‘Administration Professionals’
- Sub Major Group: 2017-24 ‘Business and Administration Professionals’
- Major Group: 2017-2 ‘Professionals’

A total of 21 titles and specialisations are listed in the OFO Code for Management Consultant.
1. Business Analyst
2. Business Coach
3. Business Consultant
4. Business Support Project Manager
5. Business Turnaround Management Consultant
6. Capital Expenditure Analyst
7. Commercial Analyst  
8. Corporate Planner  
9. Ecommerce Programme Manager  
10. Farm Management Consultant  
11. Financial Systems Advisor  
12. Management Consulting Specialist  
13. Management Reporting Analyst  
14. Operations Analyst  
15. Purchase Advisor  
16. Resource Development Analyst  
17. Service Solutions Project Manager  
18. Small Business Consultant / Mentor  
19. Strategic Developer / Facilitator  
20. Superannuation Transitions Specialist  
21. Technology Development Coordinator

Note 1: that Small Business Consultant / Mentor is cited under number 18 and is considered a sub specialisation of Management Consultant, which is resolved by agreeing that Consultant and Advisor are synonyms.

The above titles and specialities are very well mapped in the competency framework described above in Figure 10.

Note 2: There is nothing that prevents the inclusion of the OFO code 242102 Organisation and Methods Analyst with its 13 additional specialisations.

Qualifications

The Services SETA Sector Skills Plan 2019/20 listed the **OFO Code 2017-242101 'Management Consultant'** as a hard-to-fill vacancy citing lack of qualified people. Falling under the Major Group 'Professionals' additional skills gaps identified include coaching and mentoring, and facilitation, due to lack of relevant experience.

Given the low pipeline and high demand, this Occupation 'Management Consultant' was also added to the Services SETA Priority (PIVOTAL) Skills List.

According to available information, there are relatively few Skills Development Providers (SDPs) accredited and offering occupational and higher-level qualifications specifically for Business Advisors. There are university programmes which are currently available and have been offered in the past which address management consulting and coaching, both of which have large overlaps with the skills required for business advisors as defined in this document. Relevant qualifications registered and data retrieved from the NQF are provided in the table below.

The large practices are currently setting the standard in the further development of consultants and the results have been documented in Annual Assessments of these practices. This learning is particularly applicable to the fast tracking of graduates to “independent competence” as a management consultant.
Entry level criteria for such programmes are typically an undergraduate degree. Further development is accelerated by the application of informal programmes, coaching and mentoring.

Informal learning and short programmes have been prioritised by the provincial engagement participants.

Table 1. Registered BAS-related qualifications

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<tr>
<th>ID</th>
<th>Qualification Title</th>
<th>NQF level</th>
<th>Quality Assurance</th>
<th>Accredited SDPs</th>
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<tbody>
<tr>
<td>48883</td>
<td>Further Education and Training Certificate: Small Business Advising (Information Support)</td>
<td>4</td>
<td>Services SETA</td>
<td>3</td>
</tr>
<tr>
<td>79886</td>
<td>National Certificate: Business Advising</td>
<td>5</td>
<td>Services SETA</td>
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<tr>
<td>48874</td>
<td>National Certificate: Business Consulting Practice (Enterprise Resource Planning)</td>
<td>5</td>
<td>Services SETA</td>
<td>8</td>
</tr>
<tr>
<td>49419</td>
<td>National Diploma: Business Consulting Practice</td>
<td>5</td>
<td>Services SETA</td>
<td>2</td>
</tr>
<tr>
<td>48967</td>
<td>National Certificate: Business Advising Operations</td>
<td>6</td>
<td>Services SETA</td>
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<tr>
<td>94704</td>
<td>Advanced Diploma in Leadership Coaching</td>
<td>7</td>
<td>CHE</td>
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</tr>
<tr>
<td>90822</td>
<td>Postgraduate Diploma: Small Enterprise Consulting</td>
<td>8</td>
<td>CHE</td>
<td>1</td>
</tr>
<tr>
<td>93851</td>
<td>Postgraduate Diploma in Coaching</td>
<td>8</td>
<td>CHE</td>
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<tr>
<td>71815</td>
<td>Master of Philosophy in Management Coaching</td>
<td>9</td>
<td>CHE</td>
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<tr>
<td>93587</td>
<td>Master of Philosophy in Leadership Coaching</td>
<td>9</td>
<td>CHE</td>
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</table>

In 2018/19, Seda developed learning material for the National Certificate: Small Business Advising (Information Support) ID 48883 NQF level 4 and the National Certificate: Business Advising ID 79886 NQF level 5. Seda has agreed to make the learning material available to other SDPs seeking accreditation to facilitate supply. The Services SETA hosted a workshop on 27 February 2019 to validate the Seda learning material.

The qualifications in the table below have passed their end date and not been re-registered.

Table 2. Expired BAS-related qualifications

<table>
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<tr>
<th>ID</th>
<th>LP ID</th>
<th>Qualification Title</th>
<th>NQF Level</th>
<th>Quality Assurance</th>
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<tr>
<td>48886</td>
<td>-</td>
<td>National Certificate: Business Advising</td>
<td>5</td>
<td>Services SETA</td>
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<tr>
<td>61594</td>
<td>24493</td>
<td>National Certificate: Management</td>
<td>5</td>
<td>Services SETA</td>
</tr>
</tbody>
</table>
According to the EPI Business Advisor Survey 2017, 62.9% of business advisors have a university degree and 49% have 10 or more years of experience.

Some professional bodies require a B Degree as an entry level qualification but may subject the individual to RPL and recognition of management experience in the absence of a degree.

Of the Seda business advisors assessed for professional designation, 33% fall within the entry level, 18% within the intermediate level and 22% within the advanced level.

Formal prior study may vary from business, commerce, science, engineering and management studies to social sciences and or other fields of specialisation.

There are opposing perspectives as to whether Entrepreneurship can be considered a discipline in its own right or whether it emerges from several other disciplines and should be considered interdisciplinary or multidisciplinary. The proposed competency framework addresses entrepreneurship in the areas of Business Competence, Sectoral Competence and organisational lifecycle.

The qualifications listed in the table below show the emergence of qualifications in Entrepreneurship studies. New Venture Creation or Small Business Management qualifications typically target entrepreneurs. Notwithstanding this, entrepreneurs and or service providers to entrepreneurs may enrol in any of these qualifications.
Table 3. Entrepreneurship related qualifications

<table>
<thead>
<tr>
<th>ID</th>
<th>Qualification Title</th>
<th>NQF Level</th>
<th>Quality Assurance</th>
<th>Accredited SDPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>49648</td>
<td>National Certificate New Venture Creation (SMME)</td>
<td>2</td>
<td>Services SETA</td>
<td>203</td>
</tr>
<tr>
<td>66249</td>
<td>Further Education and Training Certificate: New Venture Creation</td>
<td>4</td>
<td>Services SETA</td>
<td>255</td>
</tr>
<tr>
<td>101750</td>
<td>Higher Certificate in Entrepreneurship</td>
<td>5</td>
<td>CHE</td>
<td>3</td>
</tr>
<tr>
<td>96797</td>
<td>Further Education and Training Certificate: New Venture Creation</td>
<td>4</td>
<td>Services SETA</td>
<td>255</td>
</tr>
<tr>
<td>87326</td>
<td>Diploma in Small Business Management</td>
<td>6</td>
<td>CHE</td>
<td>1</td>
</tr>
<tr>
<td>86506</td>
<td>Diploma: Small Business Management and Entrepreneurship</td>
<td>6</td>
<td>CHE</td>
<td>1</td>
</tr>
<tr>
<td>100760</td>
<td>Diploma in Entrepreneurship</td>
<td>6</td>
<td>CHE</td>
<td>2</td>
</tr>
<tr>
<td>62389</td>
<td>Bachelor of Commerce in Entrepreneurship</td>
<td>7</td>
<td>CHE</td>
<td>3</td>
</tr>
<tr>
<td>16687</td>
<td>Bachelor of Commerce Honours in Small Business Management</td>
<td>8</td>
<td>CHE</td>
<td>1</td>
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<tr>
<td>97907</td>
<td>Postgraduate Diploma in Entrepreneurship</td>
<td>8</td>
<td>CHE</td>
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<tr>
<td>101121</td>
<td>Postgraduate Diploma in Management in Entrepreneurship</td>
<td>8</td>
<td>CHE</td>
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<tr>
<td>97134</td>
<td>Master of Commerce in Entrepreneurship</td>
<td>9</td>
<td>CHE</td>
<td>1</td>
</tr>
<tr>
<td>97801</td>
<td>Master of Management in Entrepreneurship and New Venture Creation</td>
<td>9</td>
<td>CHE</td>
<td>1</td>
</tr>
</tbody>
</table>

Specific qualifications for Business Advisors have been identified as a gap between supply and demand and a priority to address. Many education and training institutions and skills development providers are starting to respond to this demand.

CPD programmes are fairly well developed amongst the recognised professional bodies but candidacy programmes are less developed. Ideally, CPD programmes should focus on the ongoing development of the competencies required by BAs.

7.5 Eco-Inclusivity

The term eco-inclusive enterprises refers to enterprises with business models that are from the outset ecological e.g. implementing sustainable production methods, contributing to efficient use of resource and waste reduction, biodiversity conservation or helping mitigate or adapt to climate change; and inclusive e.g. creating local jobs, in particular for often marginalised populations like youth, women and low-income households and through integrating these communities into local and global value chains of their enterprises by engaging them as suppliers, distributors or customers.
As part of the discussions among ecosystem partners in the Business Advisory and Business Development Services landscape, it was agreed that progress towards professionalisation should in the very least include adequate requirements and indicators for Eco-Inclusivity in both delivery and assessment (Monitoring and Evaluation) by BAs and BDS Providers.

This will address the challenge that SEED had which necessitated and led to the initiation and support of a national process towards creation of a BDS Standard and or Framework for professionalisation of Social and Green (Eco-Inclusive) Entrepreneurship for South Africa. The SEED process was adapted to then align with the one that was started by Seda and DSBD in 2011.

Note: See also ISO 20700 policy 9 which addresses social responsibility.
8. CONCLUSIONS

The research conducted to produce the final discussion document highlighted the following:

1. Multiple and somewhat conflicting perspectives and preferences, which affect terminology and reference options.
2. There is a distinct difference of opinions regarding a market development approach versus restrictive regulation.
3. The need to accommodate multiple perspectives, whilst maintaining balance and effectiveness. The concept of inclusivity versus exclusivity.
4. The cost of implementing proposed strategies has not been quantified and may result in implementation delays or a change in the strategies, depending on the implementation path chosen.
5. There is a huge gap between supply and demand in BAS and applying quick fixes may exacerbate the challenge of improving the quality of BAS.

8.1 Terminology

Terminology and consistency thereof have been an issue leading up to the final draft. There has been a gradual movement to better understanding and applicability of terms and a more inclusive approach.

An approach to standardise the use of terminology and synonyms, has led to simplification.

8.2 Regulation

No statutory regulation exists with respect to BAS in South Africa and the research conducted indicates varying levels of understanding of the requirements, implications and costs.

The current view indicates a requirement to formally or informally regulate both the quality of advisors and the quality of service delivery, which are related but should be handled by different mechanisms. The key role players have indicated a preference for self-regulation and have stated very clearly that they do not wish to play a policing role.

The industry's preference for a self-regulated solution must be understood within the context and demands of the ecosystem. Self-regulation may be a more cost-effective solution but will require appropriate checks and balances in order to function effectively.

The development of a South African National Standard must consider both aspects of quality, namely the quality of advisors (e.g. 17024) and service delivery quality (e.g. 20700).

Note: Costs, skill requirements and over-regulation, coupled with time to implement, will have serious implications for the timely achievement of the stated objectives. The directive to SABS to develop a national standard versus adopting an international standard with guidelines for use in South Africa, is a serious consideration.
8.3 Professionalisation

The Industry constantly advocates for professionalisation and this seems to have gained some traction over the last couple of years. Buy in from the various stakeholders has however been notoriously low and the landscape is fragmented, with many individual role players stating that they cannot justify the associated expense.

The representative organisations/agencies in this sector have addressed professionalisation within a self-regulated environment, but most have tended to focus on an approach developed in the South African environment. There are notable exceptions, where international standards and best practice are being applied and adhered to.

8.4 Capacity Building and Education

The research indicates that there is a large gap between the demand for suitably competent advisors and the supply thereof. The exact quantum of these and the specific competencies that are required, have not been determined.

There is a move to revive low level qualifications (e.g. NQF level 4 and 5), which will require the graduates from these to undergo a form of supervision for an applicable period, before they are deemed competent to perform independently. In order for these to be in any way effective, they should be aimed at the specific competencies that have been identified to be in short supply.

There is also a distinct conflict between the two requirements of improving delivery standards whilst simultaneously fast tracking the development of new professionals. It is noted that the intention is to develop these competencies in unemployed youth and graduates to advise SMMEs, which in itself could be problematic due to a lack of experience and possibly the wrong mindset. This approach could perpetuate the lack of quality in the delivery of BAS.

Informal training has not received the attention it deserves, given the value and effectiveness thereof. Many respondents at the provincial stakeholder forums showed a preference for informal learning. There is also mention of this view in the revised approach (underway) by the Seda Learning Academy. There is a current shift in Seda’s role to that of a facilitator. Part of the current debate is whether Seda should be directly capacitating entrepreneurs or not.

Insufficient emphasis has been placed on developing the capabilities of the procuring entities with respect to the selection of suitably qualified practitioners and the management of service delivery. The research has shown a distinct lack of capacity on the part of entrepreneurs in the procurement of BAS, so this needs to be addressed.

There is complete consensus regarding the need for formal CPD, once a professional has been awarded a professional designation. However, not all respondents are convinced about the need for professionalisation in the first place. In addressing the need for lifelong learning, CPD could be undertaken in partnership between professional bodies and learning institutions.
The Services SETA has stated that it requires industry information in order to better understand the skills gaps and the adequacy of supply to prioritise funding and facilitation of education and training on the one hand, and business advisory services to emerging, small and growing businesses on the other.

**8.5 Delivery Standards**

This discussion paper has clearly highlighted the distinction between standards for advisors as individuals and standards for the delivery of services.

A detailed analysis of ISO 20700 indicates that it provides a useful starting point for the setting of delivery standards. It also refers to the quality of advisors as part of the input requirement.

Delivery standards must, of necessity cover the entire engagement cycle from procurement to closure of an assignment. Closure processes must include evaluation of the assignment (PMEL).

Monitoring and Evaluation and Learning have been identified as important in all the discussions. **This applies specifically to the delivery of services.** Monitoring is applicable during service delivery and Evaluation happens post-delivery. However, the criteria for such evaluation have not been specified and the approach is very dependent on the depth of expertise required, level of formality and size of an assignment. The combined emphasis, as a result of the discussions, should be on Procurement, Monitoring, Evaluation and Learning (PMEL), without it being too onerous or costly.

The DSBD’s requirement for monitoring and reporting to consolidate data and information needs to find expression and support within the Industry.
9. Preliminary Recommendations

Many differing perspectives need to be accommodated in this discussion paper in an inclusive rather than exclusive approach.

The following approaches have been utilised to reach the most viable recommendations:

1. All stakeholders need to be heard.
2. Self-interest must be avoided at all costs.
3. International standards, best practice and lessons learnt must be considered and incorporated.
4. We do not wish to re-invent the wheel.
5. Costs, effort and timing must be considered when developing and agreeing strategies. Costs will not be quantified until the chosen strategy has been formulated in some detail.
6. Informal approaches should be considered, where they address the gap most efficiently and without compromising service delivery.
7. Chosen approaches should adopt a market development and not a restrictive regulatory approach.

9.1 Terminology

Consultant, Advisor / Adviser, Business Advisor / Business Adviser, Management Consultant, Business Consultant should all be used as synonyms for each other, in order to benefit from the comprehensive body of knowledge and reference sources available.

The differentiators should arise inter alia from the following, as described in the competency diagram:

- Specialism vs Generalism
- Function or role performed
- Sector served
- Size of client
- Stage of client business development, especially for Incubators and Accelerators.
- Stage of client maturity as an individual (including mindset)

The advantages of this approach are that it:

- Provides greater clarity for all stakeholders
- Facilitates standardisation of the various perspectives
- Allows access to all resources from any of the sources available, including the most appropriate reference sources and bodies of knowledge
- Has full alignment with classifications such as SIC and OFO codes
- Provides access to and alignment with International standards and the associated reciprocity
- Enables effort to be placed on more important activities

Business coaches (as distinct from life coaches) provide valuable inputs to the BAS and should be treated separately to advisors, due to the different set of competencies required.

Paid “Business Mentors” may be aligned with the “Experienced Business Advisors”, who have the competencies of both coaches and consultants and have great experiential depth and the associated wisdom.

Mentors providing free services probably need to be treated differently for purposes of this discussion paper, because they are motivated by altruism and not profit.
9.2 Appropriate Regulation:

Options investigated included:

- an independent, state sanctioned regulatory body like the Independent Regulatory Board for Auditors (IRBA) regulating and licensing all professional bodies, which in turn certify their members, or
- An independent state appointed agency (agencies) to coordinate activities on behalf of the various stakeholders and to adopt appropriate policies.
- State-supported self-regulation by industry professional bodies.

The final stakeholder forum showed a clear preference for self-regulation advised by a national policy on IBDS. The concept of a National IBDS policy was only introduced quite late in the process. It is clearly understood that IBDS will include BAS.

The licensing of all business advisors by professional bodies, based on accreditation and grading, a necessary pre-requisite requirement for anyone wishing to practice in the field, was rejected outright. There is a preference for a market regulated process of willing buyer and willing seller, with the onus being on the buyer to determine who is appointed to provide services in line with the proposed standards.

Discussions with IDC indicate that they will be willing to fall in line with the proposals of this paper and that they would be willing to defer to Seda’s mandate and recommendations with respect to the scope of this policy.

The discussion forums recommend the establishment of a reference database for Business Advisors for the following purposes:

1. To identify and source advisors
2. To log PMEL statistics, including rating of advisors
3. To enable disciplinary action in a centralised manner

What was not specified or agreed, was who is tasked to establish and maintain the database. There was some preference for this to be performed by Seda in its new role as facilitator, but this has not been confirmed.

An Ombud service is recommended but the forums stated very strongly that this is not to be a new function and could be incorporated into the mandate of the Small Enterprises Ombud Service (Ombud Service).

9.3 Professionalisation:

The forums agreed that membership of one or more professional bodies is NOT a mandatory requirement for the supply of BAS. The reasons provided include affordability, freedom of association and jurisdiction of the professional body. What was agreed is that membership of a professional body is to receive preferential treatment, similar to the points allocation for BBB-EE compliance.

Where applicable, professionalisation should focus on principles derived from ISO 17024 (supported by 20700 alignment where applicable), a strong and binding code of conduct, generally accepted designations and grading, international benchmarking, disciplinary code and SAQA recognition. Mandatory professional indemnity insurance was not agreed as a must, due to cost considerations. This may however be overridden by the buying party. Consideration of how a mandatory professional indemnity is to be paid and how much it should cover, is still undecided, given that the quantum is typically a refund of fees charged or an estimation of damages incurred.
The issue of who is responsible for enforcing the disciplinary code needs to be resolved. The reason is that without statutory regulation, discipline can only be enforced through market forces (such as the BAS database and ratings) and is still subject to litigation. Consideration should also be given to the Consumer Protection Act in this matter and enforcement of the codes of conduct by professional bodies (if the latter are supported by mandatory or preferred membership). The proposed Ombud may also play a role.

Consideration should be given to how the consolidated database of registered professionals will be established and maintained and who the contributors to such a database should be, given that professional membership is not mandatory. The proposed consolidated database is intended for use by designated agencies/organisations, as described previously.

Advocacy regarding why the buying public should insist on professionally registered providers would support disciplinary enforcement which could be via removal of membership. This approach would have legal implications and costs, which would place more of a burden on the professional bodies (as has been the case in SAICA ethical violations recently). Recent proposals regarding professional bodies having a financial reserve to cover such eventualities is not financially viable for most professional bodies.

### 9.4 Capacitation

The industry should learn from organisations that are proficient at building capacity faster than the industry average. Some of the large international practices use a combination of the following strategies to fast track professional development:

- B Degree minimum as a starting point
- Formal ongoing study in specialisms
- Online learning portals and blended learning
- Combination of coaching, mentoring and on the job training (OTJT)
- Localised training by industry professionals
- Self-study (informal)
- Short courses and
- Informal training courses

Industry designations should be aligned with formal qualifications where possible, appropriate supervision of skills development programmes applied at different levels, and application of Recognition of Prior Learning (RPL) by all professional bodies should be a requirement.

Continuous Professional Development participation and reporting is to be made a mandatory requirement for continuing to practise as a “professional” business advisor.

Education and capacitation strategies should address the gap between supply and demand and may result in partnerships between learning institutions, agencies and professional bodies.

A review and alignment between occupations, competency requirements and qualifications may be required, but this is not seen as a priority at this stage.

Management consulting as the all-inclusive occupation may not be sufficient to address the complete BAS requirements, due to the existence of specialist advisors and niche specialists, who may belong to other professions.
This impacts directly on the adequacy of qualification, curriculum design and professional development from entry to advanced levels. The final debate led to agreement that BAS, is seen as an “umbrella” profession, incorporating a myriad of skills and professions.

9.5 Delivery Standards

It is recommended that we align with the ISO 20700 standard (compliance), whilst developing strong guidelines and checklists in this regard, without incurring the cost and effort of full ISO certification/ conformity. It is strongly recommended that existing documentation, checklists, templates and other intellectual property be standardised and aligned with the standard, to prevent duplication and wastage of effort. Examples include assessments (diagnostic tools), business plan templates, funding checklists and internal procedures.

Emphasis should be placed on capacitating the procuring public (agencies, entrepreneurs, funders etc) with respect to contracting, procurement, monitoring and evaluation of professional services in line with the standard and associated guidelines.

Less experienced providers should be mentored and coached on assignments/engagements to fast track competency development and to learn best practices. More informal training should be conducted to accelerate the process of capacitation regarding delivery standards.

The Standard needs to provide for measurement of success against predetermined objectives and outcomes, and address monitoring and evaluation for continuous learning. Ideally, the outcome of monitoring and evaluation should be fed into the proposed database.

The roles of SANAS and other certification bodies should be clearly defined in relation to this standard (Compliance vs Conformance).

The issue of indemnity and recourse regarding service delivery need to be resolved, as they are referred to in the step titled "closure".

9.6 Industry Collaboration:

Enhance industry collaboration in areas such as:

- research and data sharing
- advocacy
- fee setting
- mediation services
- benchmarking, best practice, resources and monitoring.

Recommendations to establish a confederation of Professional Bodies and to regulate mandatory professionalisation have been rejected. This approach has failed previously, and we should learn from the reasons for failure.
10. ACTS CITED

1. Accreditation for Conformity Assessment, Calibration and Good Laboratory Practice Act (Act 19 of 2006)
7. Further Education and Training Colleges Act (Act 16 of 2006)

11. OTHER REFERENCES

- ISO 17024 and
- ISO 20700

12. LIST OF INTERVIEWEES

Ms Puseletso Modimogale, SAICA-ED. Interview conducted on 13 March 2019. Interview conducted by Dr Tsiliso Tamasane
Ms Bongi Msibi, Manager: Materials Development and Training Coordination. Interview conducted on 13 March 2019. Interview conducted by Dr Tsiliso Tamasane
Mr Hilton Theunissen. MD: VP International Partnerships. Interview conducted on 19 March 2019. Interviewed by Tsiliso Tamasane
Mr Angelo Kehayas – CEO of the IMCSA and SA rep to ICMCI, interviewed by Dr Tsiliso Tamasane

The Following were interviewed by Angelo Kehayas:
Mr. David Wilson and Ms. Roslyn Solomon – National Mentorship Movement
Mr. Dilley Naidoo – CEO Madala & Associates
Mr. Bashir Khan – CEO Growthsmiths International
Dr Tsiliso Tamasane – Services Seta – Planning Department
Ms. Liesel Kostlich - Executive Manager: Entrepreneurship and Cooperative Development
DSBD branch meeting representatives under the management of Dominique Vincent
Mr Phillip Phaahla – DSBD - Director of Entities Performance
Ms Bongi Msibi, Manager: Materials Development and Training Coordination
Ms Ntokozo Majola – Seda - Executive Manager: Enterprise Development Division
Mr John Francis – CEO of John Francis & Associates
Ms Tamiko Sher – BDS expert – EDSE
Mr Brendan Darroll – Researcher and Policy Development – EDSE
Mr Mokadi Max Mathye – COMENSA – Chairperson
Mr Zaid Mohidin – SABTIA – Outgoing Chairperson
Lucky Dladla – IDC – Capacity Building Coordinator and Business Advisor
13. END NOTES

\(^{1}\) Amendra Rajcoomar (2017). A Framework for the Implementation and Practice of Professional Bodies. PhD. UNISA
\(^{3}\) https://www.iso.org/conformity-assessment.html
\(^{4}\) https://www.iso.org/conformity-assessment.html
\(^{6}\) Ibid
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\(^{12}\) SEED Input Paper for Policy Prototyping Lab in South Africa. (2019)