Higher Education Regulation, Qualifications, and Accreditation in Rwanda and Africa

Regulatory Authority, Institutional Accountability, and International Comparability

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Abstract

The credibility of higher education depends upon more than the presence of formal accreditation or adherence to internationally recognisable quality-assurance terminology. Institutions must establish which authorities are legally competent to regulate their activities, which qualifications they may award, which standards apply to specific programmes and delivery modalities, and how compliance can be demonstrated without confusing documentary preparation with educational effectiveness. This chapter offers a Rwanda-anchored, source-sensitive examination of higher-education regulation, qualification frameworks and accreditation within selected African systems. Using a critical documentary and comparative synthesis of enacted Rwandan instruments, Higher Education Council (HEC) publications, official Kenyan, Ghanaian and South African sources, and continental standards, it distinguishes binding rules, regulatory instruments, operational guidance, institutional policies and non-binding professional benchmarks. Particular attention is given to Rwanda's Presidential Order No. 044/01 of July 2026, the Rwanda Qualifications Framework, evolving distance-learning and artificial-intelligence guidance, programme validation, postgraduate qualification requirements, recognition and transnational provision. The analysis identifies recurrent governance functions without presuming identical legal architectures across jurisdictions. Its practical contribution is a proposed Rwanda Higher Education Regulatory and Accreditation Reference Matrix, supported by a provenance test, a qualification-and-credit diagnostic, and a controlled change-management procedure. These tools provide an auditable foundation for curriculum development, institutional decision-making and professional evaluation, but neither replace official regulatory determinations nor constitute an empirically validated accreditation model. The chapter establishes normative authority as the indispensable starting point for subsequent discussions of institutional capability and evidence-traceable quality governance.

Keywords: higher education regulation; Rwanda Qualifications Framework; accreditation; Higher Education Council; programme approval; regulatory provenance; African quality assurance

2.1 Introduction to higher-education regulation and public accountability

A university may be academically ambitious, adequately financed and committed to student success, yet it cannot legitimately operate outside the regulatory arrangements that govern its establishment, qualifications and delivery. Equally, an institution may satisfy a documentary requirement without demonstrating that a particular curriculum is coherent, its lecturers are available, its assessments are valid or its graduates have achieved the advertised outcomes. This distinction, established in the preceding discussion of educational purpose and multidimensional quality (Sangwa, 2026b), provides the starting point for regulatory analysis. Compliance is neither the whole of educational quality nor an optional substitute for it. It is one indispensable dimension of a broader public undertaking.

Higher-education regulation concerns the creation, allocation and exercise of public authority over institutions, programmes, qualifications, professional preparation and the conditions under which awards are recognised. Accreditation is a related but narrower judgement, typically based on an authorised assessment of whether an institution or programme meets applicable requirements. Quality assurance comprises internal and external arrangements through which academic standards and educational processes are established, monitored, evaluated and improved. These concepts overlap but do not coincide. An agency's mandate, an institution's operating authorisation, a programme's approval, a graduate's qualification and a foreign award's equivalence may involve distinct legal questions and decision-makers. The existence of one should never be treated as conclusive proof of the others.

The public interest justifying regulation includes protection from fraudulent or misleading credentials, assurance of minimum academic and professional standards, equitable treatment of students, responsible use of public resources, and confidence that qualifications communicate defensible levels of learning. Higher education also yields benefits not reducible to immediate labour-market outputs, including scholarship, cultural preservation, civic reasoning and independent criticism. Accordingly, legal oversight must be capable of protecting the public without converting universities into merely administrative extensions of government. The legitimacy of a regulatory system depends partly on how it reconciles minimum standards, academic freedom, institutional differentiation, procedural fairness and continuous enhancement (Harvey & Green, 1993; UNESCO, 2021).

The central problem of this chapter is not whether Rwanda or African universities possess regulatory documents. It is whether institutional actors and reviewers can establish the correct authority, applicable provision, current version, evidentiary requirement and lawful decision route for a specific educational claim. That task becomes difficult where older procedures remain publicly available, new orders amend earlier mandates, guidance is published on webpages without express repeal histories, programme standards intersect with professional requirements, and learning occurs across national borders. A reliable approach must therefore be *source-sensitive*, *time-sensitive* and *object-sensitive*. The authorising source must be identifiable; its operative date must be established; and the rule must genuinely apply to the institution, programme, activity or qualification being examined.

The analytical method is a purposive, critical synthesis of secondary documentary sources. Its central corpus consists of Rwanda's published legal instruments and official HEC material available as of 17 October 2026, complemented by official sources from Kenya, Ghana, South Africa, the African Standards and Guidelines for Quality Assurance in Higher Education (ASG-QA), and UNESCO recognition instruments. Sources were examined for issuing authority, provenance, stated scope, formal status, substantive requirement, and practical implication. The master's outline, the completed Chapter 1 and the author's doctoral thesis provide conceptual and editorial antecedents, not independent verification of current law (Sangwa, 2026a, 2026b). This is not a systematic literature review, and no exhaustive database search, screening count, regulatory enforcement dataset, field interview or observed institutional implementation is claimed. Official publication establishes the content of a document; it does not necessarily establish whether all institutions comply, whether every referenced operational instrument remains applicable, or how a particular regulator would decide an individual case.

A six-level distinction guides the analysis. Legislation and lawfully made orders must be differentiated from regulatory standards issued under delegated authority; such standards must in turn be separated from administrative procedure, official advice, institutional rules, and voluntary comparative benchmarks. Legal force cannot be reliably assigned by document title alone. Some instructions in an official guideline may operate as

conditions of an authorised evaluation, but a guideline cannot be assumed to amend an inconsistent higher-ranking legal instrument. Similarly, a university's senate may approve an academic proposal internally without thereby granting itself the external permission required to offer it. The chapter therefore foregrounds documentary provenance before offering professional recommendations.

2.2 Historical development of quality-assurance and accreditation systems in Africa

The regulation of advanced learning in Africa predates modern accreditation agencies, but contemporary quality-assurance systems developed within historically different institutional and political settings. Islamic, Christian and indigenous traditions of scholarship coexisted with later colonial university colleges, specialist schools, professional training institutions and post-independence universities. Colonial structures often tied legitimacy to external awarding institutions or metropolitan professional expectations, while emerging states subsequently linked higher education to national reconstruction, teacher preparation, professionalisation, public administration and research capacity. The historical trajectory is thus neither a simple importation of European universities nor the emergence of a single homogeneous African model (Teferra & Altbach, 2004).

Post-independence expansion sharpened a dilemma that remains fundamental. Universities were expected to widen access and develop national expertise, yet fiscal limitations, uneven research infrastructure, staff shortages and political interventions complicated the maintenance of academic standards. As tertiary systems diversified, state authorities increasingly needed mechanisms for licensing institutions, recognising awards, controlling misleading claims, evaluating provision and ensuring that new private providers did not enter the market without credible capacity. The resulting institutional reforms were shaped both by domestic needs and by international developments in public-sector management, accountability and quality assurance (Shabani et al., 2014).

Formal external quality assurance subsequently expanded across African higher-education systems, though at different speeds and through different organisational forms. Kenya consolidated university oversight under the Commission for University Education (CUE), established through the Universities Act, 2012, with responsibilities concerning standards, university accreditation and academic programmes (Commission for University Education, n.d.). Ghana's Education Regulatory Bodies Act, 2020 (Act 1023) established the Ghana Tertiary Education Commission (GTEC), integrating central functions of tertiary regulation and accreditation (Republic of Ghana, 2020). South Africa's Council on Higher Education (CHE), established under the Higher Education Act, 1997, carries quality-assurance responsibilities through the Higher Education Quality Committee (HEQC) and has developed a more differentiated relationship among institutional audits, programme accreditation and qualification standards (Council on Higher Education, n.d.). These structures reflect distinct political settlements and statutory competences, not stages on a universal evolutionary ladder.

The historical emergence of quality agencies should not be mistaken for proof that documentary control necessarily produces educational improvement. Institutional theory illuminates the possibility that organisations adopt recognised structures to satisfy powerful external expectations, including accreditation authorities and funding bodies, without integrating those structures into everyday educational work (Meyer & Rowan, 1977; DiMaggio & Powell, 1983). Yet the converse claim would be equally mistaken: formalisation can create stable procedures, appeal rights, published requirements and conditions for more reliable evaluation. The analytical question is when external oversight improves the quality of teaching and qualifications, when it merely records conformity, and when procedural burden diverts limited academic capacity from educational work.

Regional harmonisation emerged partly in response to this diversity. Professional migration, international recruitment, cross-border programmes, student mobility and the desire for mutual trust all create demand for intelligible qualifications and credible quality-assurance arrangements. The ASG-QA, published through the Harmonisation of African Higher Education Quality Assurance and Accreditation (HAQAA) initiative, articulate a common reference for internal assurance, external assurance and quality-assurance agencies (HAQAA Initiative, 2018). The African Continental Qualifications Framework (ACQF), whose policy document was validated by participating African Union member-state representatives in 2023, similarly aims to make different qualification systems more intelligible across borders (ACQF, 2023). Neither undertaking creates a uniform supranational licensing authority. Their value lies in a shared language through which differences can be interpreted without abolishing them.

The next phase of African quality assurance must confront four recurrent tensions. Regulators need comparable standards without suppressing institutional mission; universities need accountability without excessive procedural delay; educational systems need flexible pathways without lowering qualification integrity; and digital expansion needs cross-border openness without sacrificing national jurisdiction and learner protection. The most persuasive lesson of African regulatory history is consequently not the superiority of a particular organisational design. It is the need to preserve clear public authority, credible institutions, defensible academic thresholds and opportunities for improvement while adapting procedures to context.

2.3 Rwanda's higher-education governance architecture: Institutions, responsibilities and decision authority

Rwanda's higher-education regulatory architecture combines constitutional and statutory governance, ministerial responsibility, a specialised national higher-education body, institutional governing organs and, where applicable, sector-specific professional authorities. The Ministry of Education provides national educational policy leadership and governmental supervision of the Higher Education Council. Higher learning institutions remain responsible for their academic and organisational affairs within their legally recognised status and applicable conditions. Additional public bodies may hold responsibilities relating to financial accountability, occupational recognition, personal data, public-sector employment or professional practice. These competences should be mapped rather than collapsed into an undifferentiated concept of governmental approval.

A decisive development occurred in July 2026. Presidential Order No. 044/01 of 24 July 2026, published in the *Official Gazette* special issue of 30 July 2026, now governs HEC's mission, responsibilities, powers, organisation and operation. Article 26 expressly repeals the provisions of Presidential Order No. 081/01 of 28 August 2020, except its Article 2. The 2020 order therefore remains part of the legal history but cannot be cited indiscriminately as the currently governing statement of HEC's responsibilities. Article 28 provides for commencement upon gazette publication (Republic of Rwanda, 2026, arts. 26-28). This is not a minor bibliographic update: an evaluator who relies solely on the older order risks misunderstanding the current scope of regulatory functions, especially with respect to international programmes, online provision and technology governance.

Article 4 places HEC under the supervision of the ministry responsible for education. Article 5 sets out a mission concerning quality, relevance, globally competitive programmes, research and employable graduates. Article 6 covers the accreditation of new higher learning institutions; monitoring of accredited institutions; accreditation relating to international and online programmes; compliance with admission standards; development of academic and institutional standards; approval and upgrading of curricula and academic programmes;

oversight of research and innovation; recognition-related responsibilities; technology governance; institutional performance and data accuracy; and several related administrative functions. Article 7 expressly empowers HEC to impose sanctions on institutions failing to comply with educational quality standards (Republic of Rwanda, 2026, arts. 4-7). These provisions establish public authority, but an individual sanction still requires the applicable legal and procedural basis, reliable findings and due process. A reviewer does not acquire an independent power to sanction because the regulator possesses one.

The 2025 admission policy, the 2025 appeals procedure and the 2021 attachment guidance also illustrate an important source-history distinction: a document's cover date, its online modification date, its present administrative use and its legal authority are four different attributes. The researcher or evaluator should record each separately. A newly uploaded older document is not automatically new law; conversely, an older administrative procedure is not automatically inapplicable merely because a newer presidential order has replaced its former institutional reference. Currency is a justified finding about a particular provision, not a presumption derived from the age of a file.

Rwanda's educational organisation and qualification architecture also rests on Law No. 010/2021 of 16 February 2021 determining the organisation of education, together with the Rwanda Qualifications Framework (RQF) established through Ministerial Order No. 003/MINEDUC/2021 of 20 October 2021 (Republic of Rwanda, 2021a, 2021b). The RQF provides a common language for levels, credits, outcomes, qualifications and pathways. It informs academic design but should not be confused with an institution's approval to confer a specified award. Its educational role is to ensure that a degree communicates appropriate learning complexity, demand and achievement, rather than merely a familiar title.

The policy-to-practice distinction is particularly visible in admission and professional qualification requirements. A programme may be lawful to offer while an individual applicant has not established the required prerequisites; an individual may earn a valid academic qualification while a profession lawfully requires additional registration or supervised practice; and a foreign degree may be authentic without automatically satisfying equivalence requirements. An accurate review report should use separate headings or claim identifiers for these distinct judgments rather than folding them into the single phrase 'accredited and recognised'. Students, institutions and credential evaluators need to know precisely which question each document answers.

Within an individual institution, governance typically operates through a governing board or council, executive leadership, senate or equivalent academic authority, faculties, departments, programme teams and internal quality-assurance arrangements. The legal powers and precise names of these organs depend on the institution's establishing instruments and approved statutes. The senate's academic approval, a finance committee's resource endorsement, an ethics committee's research approval and HEC's external regulatory act answer different questions. They form a necessary chain in many programmes, but they should not be conflated. A sound institutional register records the specific decision-maker, scope, date, evidence and legal effect of each approval.

The 2026 reform makes change-management discipline particularly important. An institution preparing a new programme should not rely exclusively on inherited precedent or an old validation checklist. Its responsible academic office should identify current HEC directives, verify applicable professional standards, establish whether programme or delivery-mode approval is required, and document any advice obtained from the competent body. Existing approved programmes should likewise be reviewed for changes that materially affect qualification structure, delivery, academic staffing or learning outcomes. Continuity of enrolment does not necessarily mean immunity from updated conditions; conversely, the publication of a new instrument does not

automatically establish retroactive application to every already-approved cohort. Transitional interpretation must be grounded in the instrument and, where necessary, in a written authoritative determination.

2.4 The Higher Education Council: Accreditation, programme approval, evaluation and monitoring

A prospective applicant should be able to distinguish an institution's legal establishment, its permission to operate, its approval to award a particular qualification, and any conditions attached to the specific programme or site. Those are separate verification questions. For the university, credible public information should therefore identify the authorised name of the awarding body and any restrictions on programme title, award level, location, intake, professional pathway or delivery modality. For the reviewer, the evidentiary starting point is the operative approval or equivalent official record rather than a promotional claim. HEC's public-facing services and accreditation materials facilitate verification, but the absence or presence of a website listing should be interpreted with regard to the authoritative administrative record.

HEC occupies a central position because it links national educational policy to institution- and programme-level accountability. Its role is both prospective and continuing: new providers and programmes must establish sufficient grounds for authorisation, while existing provision remains subject to standards, monitoring and improvement expectations. The published HEC accreditation-process portal distinguishes institutional accreditation and programme-related materials, including an application for a definitive operating agreement for private providers, programme proposals, module descriptions and review processes (Higher Education Council, n.d.-a). The portal is an important route to official forms but should not be read as a complete, self-contained statement of current law. Some webpages and associated templates preserve terminology and procedural material originating in earlier regulatory periods.

Institutional accreditation and programme approval test different propositions. Institutional review concerns whether an organisation has the governance, integrity, resources, infrastructure and academic processes needed to operate credibly. Programme review concerns the academic and practical merits of a particular award: its rationale, qualification level, curriculum architecture, staffing, assessment, student support, facilities and sustainability. A provider with institutional authorisation cannot assume that every proposed programme is automatically approved. Similarly, approval of one degree does not confer unrestricted authority over a new delivery mode, campus or externally franchised programme. The evaluator must verify the exact object and conditions of the authorisation.

The distinction between evaluation and decision is equally important. An external peer-review panel may inspect documents, interview appropriate participants, examine facilities and test claims about programme readiness. Its report can record findings and make a recommendation, but the legal act of approval, refusal, amendment or enforcement belongs to the body authorised under the governing arrangements. This separation protects both reviewer independence and administrative accountability. The panel's expertise informs, but does not replace, the legally competent decision-maker. It also means that adverse conclusions must distinguish an established failure against an applicable requirement from a matter on which evidence is inadequate or contradictory.

HEC's current responsibilities encompass continuing monitoring, not merely entry control. Under Article 6 of the 2026 Order, institutional oversight includes standards and monitoring arrangements; academic programmes may be approved and upgraded; and data accuracy and institutional performance are explicit concerns (Republic of Rwanda, 2026). These powers make quality assurance an extended lifecycle responsibility. Institutions should maintain evidence of delivery, moderation, student outcomes, grievances, staffing changes, research capability, programme review and corrective action. Accreditation papers assembled

only in the months immediately preceding a visit are therefore a weak substitute for routine institutional evidence systems.

The Council's self-assessment and review approach offers a foundation for professional judgement, but evaluators must avoid converting every published example of good practice into an independent legal requirement. HEC's *Guidelines for Internal Quality Assurance (IQA) Mechanisms for Higher Education* offer operational expectations for institution-wide QA, while programme-specific and modality-specific documents may establish further criteria (Higher Education Council, 2021a, 2025c, 2026a). The normative force of an individual item depends on the current instrument, its legal basis, adoption and application to the case. Expert reports should identify whether the observed condition is a clear non-compliance, a deficiency in evidence, an improvement opportunity or a question requiring interpretation by HEC.

A robust HEC evaluation process is thus necessarily evidence-sensitive. A lecturer's curriculum vitae supports a claim of qualification but not necessarily of contractual availability or sustainable workload. A laboratory inventory documents assets but not operational safety, access or scheduled capacity. An LMS screenshot shows configuration at a time but not reliable teaching, authenticated assessment or student engagement. An annual QA policy demonstrates stated institutional intention, not closure of identified problems. Reviewers should seek corroboration proportionate to the risk while protecting confidentiality and avoiding needless duplication. These principles anticipate the book's later Evidence-Traceable Accreditation Judgement (ETAJ) model, whose rationale is argumentative transparency, not mechanical scoring or an assertion of HEC endorsement (Sangwa, 2026a).

2.5 The Rwanda Qualifications Framework: Levels, credits, progression and recognition

Qualifications frameworks solve a basic communication problem: the words *certificate*, *diploma*, *bachelor's degree*, *master's degree* and *doctorate* do not establish equivalence unless the level, workload, outcomes, purpose and quality of their award can be interpreted. The RQF addresses that problem through nationally articulated qualification types, level descriptors and credit-related expectations (Republic of Rwanda, 2021b). It is both a design reference for programme teams and an evaluative reference for institutional committees and HEC experts. Its usefulness depends on faithful interpretation rather than transcription of its terminology into programme brochures.

The RQF identifies levels by expected sophistication of knowledge, skills and autonomous performance. At the advanced end, master's and doctorate qualifications are associated with Levels 9 and 10, respectively, as reflected also in HEC's *Postgraduate Degree Framework*, dated July 2026 and placed on the HEC website in October 2026 (Higher Education Council, 2026b). Distinguishing levels is not only a matter of numerical classification. A higher qualification should require more demanding conceptual engagement, methodological independence, critical analysis and original or advanced professional contribution as appropriate to its nature. A programme built predominantly around undergraduate-level recall does not become doctoral merely because the cover page bears a doctoral award title.

Admission governance requires attention to fairness as well as selectivity. The 2025 national admissions policy discusses academic entry routes, English-language competence, medical information, character considerations and programme-specific conditions (Higher Education Council, 2025a). The application of those provisions should distinguish genuine qualification or public-safety necessities from inappropriate generalisation about disability, health, prior conviction or personal circumstances. In particular, information requirements should have a defined purpose, lawful basis, appropriate confidentiality and a process for challenging adverse interpretations; an admission rule for a regulated profession should not be extended automatically to an

unrelated discipline. Institutions should record how alternative qualifications or recognition of prior learning are assessed for equivalence while preserving the capabilities needed for successful study.

Credit is a measure of *notional learner effort* required to achieve learning outcomes, not a simple count of classroom contact hours. Section 5.2 of the 2021 RQF specifies that one credit equals ten notional learning hours and describes 120 credits, corresponding to 1,200 hours, as the minimum academic-year reference. Notional time includes direct contact, independent study, assignments, practical tasks and assessment; credits are not earned unless learning outcomes are achieved (Republic of Rwanda, 2021b, §5.2). This distinction is vital for curriculum approval. A 15-credit module nominally represents approximately 150 hours of student learning, not necessarily 150 hours of lectures. A timetable that lists only taught sessions is therefore insufficient to verify workload coherence.

Table 2.1

Rwanda qualification and credit controls for academic programme review

Review dimension	Authoritative reference or verified principle	Evidence expected from an institution	Main evaluative caution
Qualification level	RQF level descriptors; postgraduate Levels 9 and 10	Graduate profile, programme outcomes, module complexity, assessment samples	Award name does not establish intellectual level.
Credit calculation	RQF: 1 credit = 10 notional learning hours	Credits-by-module register and realistic workload breakdown	Contact hours are not total notional learning.
Annual demand	RQF uses 120 credits/1,200 hours as annual reference	Academic calendar, programme duration, workload and sequencing	Do not infer that any programme may compress its duration.
Progression	Approved admissions, prerequisite and progression rules	Admissions regulations, learning pathway, RPL and credit-transfer decisions	Access flexibility cannot erase missing competencies.
Assessment and award	Outcomes must be achieved, not merely attended	Moderated work, grading rules, progression and award records	Participation does not equal competence.
Postgraduate specification	HEC Postgraduate Degree Framework (2026)	Award type, research/supervision plan, milestones, examination conditions	Check precedence and specific approved route.

Note. Author's source-grounded synthesis from Republic of Rwanda (2021b) and Higher Education Council (2026b). This is an analytical review aid, not an official HEC classification instrument.

Duration, annual credits and qualification totals require particular caution because different documents may state requirements at different levels of generality. HEC's July 2026 *Postgraduate Degree Framework* (uploaded in October 2026), for example, explicitly describes doctorates at RQF Level 10 with a minimum four-year duration and 360 credits, while the 2021 RQF sets out the general 120-credit annual reference (Higher Education Council, 2026b, p. 9; Republic of Rwanda, 2021b, §5.2). The figures should not be silently adjusted, averaged or converted into a universal rule. They present a genuine interpretive issue requiring attention to the newer framework's purpose, any programme-specific rules, full-time-equivalent conventions, applicable exceptions, approval letters and written clarification when necessary. An expert should record the relationship between the instruments rather than declare an unauthorised resolution. A provisional scholarly inference is that a stated programme minimum and a general annual workload norm address related but not identical questions; it remains the authorised regulator's role to determine their application in a concrete case.

Progression and recognition introduce another layer of complexity. Admission criteria protect the intellectual demands of a qualification, but unnecessarily rigid entry routes can exclude capable applicants with substantial occupational or non-formal learning. Recognition of prior learning (RPL), credit accumulation and transfer permit such learning to be assessed and used appropriately where the governing qualification and institutional policies allow. Recognition should be based on demonstrated equivalence to relevant outcomes and level descriptors, with fair assessment, moderation, transparent credit ceilings where applicable and a documented decision. Awarding credit merely for years of employment, attendance at a short course or professional status would risk undermining level integrity. Conversely, forcing a competent learner to repeat fully demonstrated learning can be educationally wasteful and inequitable (ACQF, 2022).

Postgraduate qualifications require particular care because conventional degree titles conceal different academic purposes. HEC's 2026 framework distinguishes research, coursework and professional doctoral pathways while requiring doctoral-level originality, independence and a research contribution; it also differentiates master's-level forms and sets expectations concerning supervision, examinations, scholarly outputs and programme governance (Higher Education Council, 2026b). An institution should state not merely that it offers a doctorate, but which accredited award and pathway it offers, what doctoral work is compulsory, how candidates will be supervised and assessed, what counts as an acceptable research output, and how external examination and appeals are protected. An unconventional pathway, including a portfolio of publications or professional research output, is not automatically equivalent to an authorised RQF Level 10 award absent programme-level approval and defensible examination arrangements.

A practical workload test should assess the learner's actual week, not only the sum of module credits. Consider an illustrative 480-credit bachelor's programme scheduled over three years. Its arithmetic implies 4,800 notional learning hours, or an average of 1,600 hours per year. That already exceeds the RQF's general 1,200-hour annual reference before examining the programme's precise regulated duration or academic calendar. This calculation is a *screening signal*, not an invented legal conclusion: the evaluator should locate the applicable award-duration requirements, count available teaching and assessment weeks, test concurrent module loads and determine whether any recognised intensive or alternative pathway is authorised. An identical 480-credit programme spread over four years would average 1,200 notional hours annually, but would still need satisfactory academic sequencing, learning resources, actual staffing and external approval. Credit arithmetic is necessary; educational feasibility and regulatory provenance remain separate tests.

The qualifications framework should be treated as a discipline of educational design rather than a mechanical timetable rule. A carefully justified curriculum maps competencies to an award level, assigns realistic time to learning, sequences increasing complexity, creates legitimate entry and exit routes, and assesses attainment. Institutions should record both *formal credit arithmetic* and *educational feasibility*. A degree may add up correctly and still require an unrealistic weekly workload; another may offer academically rich modules but fail to reach the stipulated award threshold. Sound regulation has to test both, and distinguish shortfalls in the curriculum's design from uncertainty about current legal interpretation.

2.6 National requirements for programme development, validation, approval and modification

A programme is simultaneously an educational proposition, an organisational commitment and a regulated qualification. Its proposal must show why the award is needed, what graduates should be able to know and do, which educational activities will develop those capabilities, how attainment will be assessed, and whether the institution can sustain delivery. National regulation gives this educational proposition formal boundaries, but those boundaries must be translated into academic design before an approval dossier can be considered

credible. The fact that individual documents have been completed does not prove that they describe one coherent programme.

Rwanda's HEC portal makes available materials concerning programme proposals, programme specifications and module descriptions, while a publicly posted document entitled *Procedures for the Validation of Modules and Programmes* describes internal stages involving programme teams, faculty-level consideration, university-level validation and senate approval (Higher Education Council, 2007). The document's own heading states that it was revised in April 2007, although the HEC website displays a later upload or modification date. That distinction illustrates precisely why document metadata cannot be equated with normative currency. The procedures remain useful for understanding an established model of internal validation, but institutions must confirm their present applicability alongside the 2026 governing order, newer HEC standards and their own lawfully approved academic regulations. A reviewer should not describe a 2007 procedural sequence as newly enacted in 2024 merely because it was uploaded then.

Programme development normally begins with a defensible statement of educational and social need. Appropriate evidence might include national development priorities, employer and professional requirements, disciplinary developments, graduate-pathway analysis, institutional mission and comparative programme benchmarks. The purpose of needs analysis is not to manufacture demand figures for an already chosen title. It is to identify a genuine educational problem and show how a proposed qualification responds to it at the proper level. Evidence should be proportionate: national labour-market data may be useful but cannot automatically justify the specific content, staffing or viability of an individual programme. Where statistics are unavailable, reasoned qualitative evidence and transparent uncertainty are preferable to fabricated forecasts.

A coherent programme dossier should then establish the proposed award's name and RQF alignment, total credits, duration, admission and progression rules, delivery mode, graduate attributes, programme learning outcomes, module structure, prerequisites, assessment methods, staff assignments and resources. The module descriptions should be mutually consistent with the programme specification and the proposal form. A credit distribution that does not reconcile across the three documents, duplicated module codes, contradictory semester or trimester allocations, inaccessible practical training arrangements, or a research requirement unsupported by supervision capacity are not merely editorial matters. They may reveal weaknesses in curriculum control, academic feasibility or the traceability of the approved academic offer.

Curriculum control also requires explicit treatment of work-integrated and professional learning. HEC's *Higher Education Guidelines for Students' Industrial Attachment*, a document dated 2021 although displayed in a September 2026 website listing, addresses institution-industry collaboration and the organisation of practical experience (Higher Education Council, 2021b). Its age and posting date should be separately recorded; neither implies that it overrides current profession-specific standards. A placement-bearing programme needs written agreements or equivalent reliable arrangements showing capacity, supervision, learning outcomes, student insurance and safety where relevant, assessment responsibility, and mechanisms for responding to site withdrawal. In medicine, nursing, teaching and comparable fields, a simulated placement or short observational visit cannot simply replace required supervised practice because the documentary programme adds up in credits. Academic approval should test the reality of the learning environment.

Internal validation is best understood as a sequence of substantive decisions rather than a series of signatures. The responsible faculty should test disciplinary depth, redundancy, prerequisite logic and the match between modules and graduate outcomes. Finance should establish affordability and recurrent cost rather than confirm only the initial budget. Human-resources and academic leaders should verify staffing availability and workload rather than append a list of names. Libraries, laboratories, digital learning services and student-support units

should confirm that required resources can actually be deployed. A senate or delegated academic authority should consider whether the educational case is intellectually and institutionally justified. Only after this work should the institution seek the relevant external approval through the authorised route.

This distinction is especially important when programme modification is proposed. Not every correction to a reading list has the same legal significance as changing the award title, credit structure, duration, professional outcomes, delivery modality or campus. Yet an institution cannot safely create its own unverified exemption from external approval. A controlled modification protocol should classify the proposed change, identify any conditions in the original approval, check the latest applicable HEC instructions, review implications for existing students and determine whether prior approval or notification is required. Article 6 of the 2026 Order includes approval and upgrading of curricula and programmes among HEC's responsibilities (Republic of Rwanda, 2026). This power should not be converted into an assumption about the amount or applicability of any fee without checking the current approved tariff and procedural basis. That legal competence makes it particularly important to avoid treating every senate decision as sufficient external authority.

Table 2.2

Evidence-gated sequence for development and approval of an academic programme

Stage	Required academic or governance judgement	Representative evidence	Responsible decision level
1. Concept and need	Is the proposed award educationally justified?	Rationale, benchmark, stakeholder evidence, feasibility assumptions	Programme team; faculty and strategic leadership
2. Qualification design	Do title, outcomes, level, credits and duration cohere?	RQF mapping, curriculum map, programme specification	Academic design and QA committees
3. Delivery assurance	Can staffing, facilities, support and assessment operate?	Workload, contracts, LMS/lab tests, budget, learner-support plans	Service owners; finance; academic leadership
4. Internal validation	Are disciplinary integrity and institutional accountability demonstrated?	Reviewer comments, revisions, validation report, approval minutes	Faculty board; senate or authorised academic organ
5. External submission	Has the institution met the current HEC application requirements?	Current forms, supporting evidence, version register and submission record	Authorised institutional officer; HEC
6. Decision and conditions	What is the exact scope of lawful approval?	Written decision, conditions, location, modality, approved programme version	Legally competent approving authority
7. Post-approval control	Is the programme delivered as authorised and improved responsibly?	Monitoring, moderation, corrective actions, change log, renewal evidence	Programme owners, internal QA and HEC as applicable

Note. Original professional synthesis informed by Higher Education Council (2007, n.d.-a) and Republic of Rwanda (2026). Stages are proposed audit gates, not a representation of one prescribed contemporary HEC workflow.

An institution ought to preserve an approved *baseline version* of each programme, comprising the curriculum structure, definitive module specifications, assessment architecture, student-facing regulations and external authorisation. Without such a baseline, later corrections can create uncertainty about what was actually approved. Version identifiers, effective dates, senate resolutions and correspondence with HEC should be linked

in a secure register. The baseline should distinguish amendments that apply to future cohorts from transitional arrangements for students already enrolled. Such version control protects learner expectations as well as regulatory accountability.

Evidence of implementation readiness should be examined before programme launch, but its intensity must reflect educational risk. A proposed general studies programme may require verified classrooms, staff, accessible resources and appropriate assessment arrangements. A nursing, engineering or laboratory-intensive programme requires additional attention to supervision, safety, professional recognition, equipment functionality and practice placements. A predominantly online programme requires evidence that its learning environment and support systems work for the intended cohort. Equal standards of academic legitimacy do not imply identical evidence bundles. What matters is whether the selected evidence can establish the risks and functions material to the programme's promises.

2.7 Quality assurance for distance, online, blended, virtual and AI-mediated education

Digitally mediated education exposes the limits of regulating only by qualification title and broad institutional status. Delivery modality changes the mechanisms through which students access teaching, undertake laboratory or clinical work, authenticate assessment, receive feedback and seek assistance. A degree with the same outcomes may therefore require different supporting facilities and evidence when delivered online, blended or on campus. Modality is not an independent guarantee of quality or inferiority; it is a material part of the programme's educational and regulatory configuration (Hodges et al., 2020; UNESCO, 2023).

HEC's *Guidelines and Assessment Tools for the Virtual Learning and the Use of Artificial Intelligence in Rwanda's Higher Learning Institutions*, posted in November 2025, explicitly distinguish face-to-face provision with ICT integration, blended learning, fully online provision and distance learning, and address institutional AI use (Higher Education Council, 2025c). The March 2026 *Guidelines and Assessment Tools for Distance Learning in Rwanda's Higher Learning Institutions* develop further modality-specific expectations concerning infrastructure, learning materials, staff preparation, assessment, organisational responsibility and student support (Higher Education Council, 2026a). These documents are substantial official assessment resources rather than merely aspirational commentary. Nevertheless, a reviewer should verify whether HEC has issued a later directive clarifying their concurrent application, whether particular expectations are incorporated into accreditation conditions, and what modality the institution has actually been authorised to offer.

The current public documents identify demanding quality considerations. They discuss LMS administration, instructional design, multimedia development, trained staff, student orientation, access to appropriate devices and connectivity, suitable learning content, accessibility, assessment controls, institutional e-learning and AI policies, and management responsibility. The 2026 distance-learning guidance indicates that examinations, other than assignments and projects in its specified context, ordinarily require in-person invigilation, while permitting virtual invigilation where an appropriate online proctoring tool is available; it also recommends a balance of online and face-to-face assessment according to readiness (Higher Education Council, 2026a, pp. 16-17). This is not a licence to assume that every online programme may omit physical components or that an off-the-shelf proctoring subscription automatically establishes assessment validity. The programme's approved conditions, professional requirements, technical dependability, privacy law and assessment purpose must be read together.

A degree advertised as *self-paced*, *fully online* or *distance learning* should accordingly make its limitations transparent. Students need to know whether examinations require travel, whether practical classes or intensive sessions are compulsory, what equipment and connectivity are essential, whether learning centres are available,

how identity verification works, and whether the award is approved for that mode of provision. A programme can be geographically flexible in its teaching but not fully remote in its assessment or practical work. Ambiguous marketing risks shifting unanticipated costs onto students and may create disputes about what was promised. Responsible regulation should therefore examine accuracy of student-facing representations alongside the technical conditions of provision.

A useful modality audit should follow a student through an actual sequence of academic tasks. Using an ordinary, appropriately authorised learner account, reviewers can test admission and orientation, access to materials on a modest mobile connection, submission of assessed work, receipt of feedback, access to library resources, a request for disability-related adjustment, communication with a lecturer, and the procedure for recovering after a platform outage. Each test should record the date, course version, role permissions and outcome without disclosing sensitive student records. This approach distinguishes a technically impressive demonstration from the conditions that a real cohort is likely to encounter. It is an illustrative professional audit method, not a claim that HEC prescribes this particular sequence.

The distinction between emergency remote teaching and deliberately designed online learning remains central. A lecturer's use of videoconferencing during a disruption may preserve continuity, but it does not establish a sustainable online curriculum. Planned digital education requires coherent asynchronous resources, appropriate interaction, timely feedback, assessment validity, staff workload, accessible content and support arrangements. Reviewers should inspect actual course shells, test navigation and alternative formats, follow sample assessment workflows and confirm that the proposed student experience is plausible under varying bandwidth conditions. A software procurement invoice or a demonstration account configured for inspectors does not substitute for evidence that the institutional service can support a real cohort.

Generative AI deepens the evidence problem. AI may support translation, explanation, formative feedback, drafting and accessibility, yet its outputs can be inaccurate, biased or insufficiently attributable. It can also obscure whether submitted work demonstrates a student's own competence. UNESCO's guidance on generative AI in education and research treats human agency, institutional readiness, data protection and educational purpose as central safeguards (Miao & Holmes, 2023). HEC's 2025 virtual-learning guidance includes an institutional AI-policy expectation (Higher Education Council, 2025c). An institution therefore needs assessment-specific statements of permitted assistance, procedures for disclosure, meaningful human oversight, evidence of original reasoning where necessary, and fair processes for investigating potential misconduct. AI-detection scores should not be treated as independent proof of dishonesty; empirical assessments of detection tools identify important reliability limitations (Weber-Wulff et al., 2023).

Digital provision also intersects with binding law beyond higher-education regulation. Rwanda's Law No. 058/2021 of 13 October 2021 concerning personal data and privacy governs relevant processing of personal information and may apply to students, staff, overseas data processors and digital assessment providers according to its scope (Republic of Rwanda, 2021c). The transfer of identifiable learning analytics, identity documents, examination recordings or research records to a third-party platform requires data-governance consideration rather than only academic consent. Institutions must determine lawful processing grounds, appropriate safeguards, retention limits, access rights and applicable cross-border processing arrangements. Contractual outsourcing does not eliminate the controller's relevant obligations; equally, privacy concerns should be addressed through lawful design rather than used to prohibit every educational technology without proportional analysis.

There is an unavoidable balance between assessment integrity and learner rights. Online proctoring may address some impersonation risks but can create surveillance, disability-access and data-protection concerns.

Oral examination, supervised practical demonstration, project checkpoints, contextualised tasks, portfolios and moderation may contribute additional evidence of individual achievement. Not all such methods are interchangeable with a required invigilated examination, and a professional qualification may require specified supervised practice. The correct approach begins by identifying the authoritative requirement and the educational risk, then selecting lawful and valid forms of assurance. It neither assumes that software surveillance is indispensable nor treats invigilation requirements as dispensable personal preferences.

Regulatory assessment of AI-mediated provision should remain dynamic. Institutional policies need named academic ownership, clear classification of high-consequence uses, procurement review, staff training, version monitoring, incident reporting and periodic reassessment. A system supporting optional formative practice presents different risks from one automatically scoring final examinations or screening admissions. Human responsibility for grades, progression and disciplinary decisions should remain explicit unless competent law provides otherwise. These considerations belong ultimately to programme and institutional governance, but the regulator must be able to ask for credible evidence that responsibility is assigned and exercised.

2.8 Institutional autonomy, academic freedom, regulatory accountability and enhancement

University autonomy is often invoked as though the term described unrestricted freedom from public oversight. In practice it comprises differentiated freedoms and responsibilities, including academic decisions on curricula and research, organisational management, appointments, financial arrangements and the exercise of scholarly judgement. Their scope depends on the applicable legal structure, public or private status, constitutional protections and institutional charter. Academic freedom specifically protects inquiry, teaching, criticism and reasoned scholarly expression within professional responsibilities; it is neither identical to managerial autonomy nor an exemption from valid academic standards.

Regulatory accountability rests on a different justification. Institutions confer credentials on which students, employers, professions and governments rely. Admission policies, qualifications, public-facing descriptions and assessment outcomes create reasonable expectations. National authorities must therefore establish enforceable minimum conditions and mechanisms for investigating their breach. The strongest autonomy argument does not justify a provider offering an unapproved qualification, evading safety standards or misleading students about recognised awards. Conversely, the fact that a regulator has lawful oversight does not entail that it should prescribe every reading, method of inquiry or legitimate disciplinary interpretation. Academic quality requires both independent judgement and a defensible regulatory floor.

The balance is threatened by *compliance reductionism*, in which the accumulation of forms becomes the dominant meaning of quality. An institution may devote extensive resources to preparing self-evaluation reports while failing to address delayed feedback or unreliable student support. Review panels can compound the problem by requiring excessive documentation, introducing unstated criteria or treating stylistic preferences as enforceable rules. Those practices are not made academically sound by their administrative appearance. Appropriate evidence standards should be risk-based, limited to the claims under evaluation, explained beforehand where possible, and open to institutional response. A quality agency has a responsibility not only to demand evidence but to avoid creating needless evidentiary burden.

The converse risk is *regulatory minimalism*, where institutional autonomy is interpreted as complete self-certification. A senate-approved programme can still lack required external authorisation; a university may call an award innovative while concealing inadequate level or workload; a private provider may claim international affiliation without ensuring lawful local operation. Independent academic judgement should be recognised within a publicly accountable framework that protects students from opaque institutional discretion. This is

particularly important for students who have limited capacity to verify accreditation claims before paying fees or relocating for study.

Quality enhancement supplies a constructive middle position. Institutions should not need a regulator to identify every weakness in course design, supervision, assessment or accessibility. Effective internal QA continually examines evidence, corrects defects and evaluates whether interventions work. External review can support this culture by identifying material risks, giving intelligible reasons for findings, distinguishing minimum obligations from suggestions and allowing institutions flexibility in achieving demonstrably equivalent educational functions. The ASG-QA's emphasis on internal assurance, external evaluation and agency responsibilities is useful here because it links accountability to organised improvement without requiring all universities to share the same mission (HAQAA Initiative, 2018).

Procedural rights now warrant more concrete treatment because HEC publishes an *Appeals and Complaints Procedures for the Higher Education Council Services* document dated December 2025, subsequently listed on its website in March 2026 (Higher Education Council, 2025b). It differentiates an appeal against an adverse administrative decision from a complaint about service delivery, addresses accreditation and foreign-qualification recognition, and sets out internal and external review stages. The document describes an initial 30-working-day appeal period for accreditation decisions, but its detailed steps, fees and addressees should be verified against the current operative instructions for the particular decision. Its introductory legal reference to the 2020 presidential order is historically understandable but must now be read in the light of the July 2026 repeal. The principle is more important than a copied timetable: institutions should receive reasoned decisions, know their available routes of challenge and preserve the decision record in a form that permits fair reconsideration.

Academic freedom should also protect the intellectual integrity of accreditation itself. Reviewers must be free from undisclosed conflicts, political pressure and institutional inducement. Their professional reasoning should remain open to scrutiny and correction. Institutional representatives must be able to clarify facts, present counter-evidence and challenge an unsupported interpretation through available procedures. Due process is therefore not a procedural courtesy added after technical evaluation. It is part of the epistemic quality and legitimacy of the judgement: a conclusion is stronger when material counter-evidence has been fairly considered.

2.9 Comparative regulatory approaches in Kenya, Ghana and South Africa

A comparison with other African jurisdictions is useful only when it respects differences in mandate, legal hierarchy and educational provision. Kenya, Ghana and South Africa were selected in the author's doctoral work as bounded comparators because they illustrate different quality-agency arrangements and offer identifiable official documentary sources (Sangwa, 2026a). The purpose here is not to rank national systems or infer relative teaching quality from official webpages. It is to identify recurring governance functions and their different institutional expressions. Each country's current statutes, amended regulations and regulator instructions remain authoritative for its own cases.

In Kenya, the Universities Act, 2012 established the Commission for University Education, succeeding an earlier Commission for Higher Education. CUE regulates university education, accredits universities and academic programmes, publishes recognised institutions and provides standards and evaluation tools (Commission for University Education, n.d.). The Universities Regulations, 2014 and published University Standards and Guidelines articulate more specific expectations. Publicly available CUE materials distinguish curriculum design, academic resources, site inspection, programme evaluation and modes of provision. Importantly, the Kenyan

regulator published draft Universities (General) Regulations, 2026 for consultation; a draft under public consultation cannot be treated as enacted law solely because it appears on an official website. That situation demonstrates the need to distinguish live consultation, established rules and future legal changes.

Ghana's GTEC derives its mandate from the Education Regulatory Bodies Act, 2020 (Act 1023). The statute provides for institutional and programme accreditation, regulatory review and conditions on the advertising of unaccredited provision (Republic of Ghana, 2020). In Ghana, the interdependence of institution-level status, programme authorisation and public communication is especially visible. It would nevertheless be incorrect to claim that the Ghanaian sequence or evidentiary threshold applies by analogy in Rwanda. Comparative learning can identify the value of public registers and transparent promotional claims while recognising the sovereignty of each jurisdiction's law.

South Africa operates through a more distributed qualifications and quality-assurance environment. The Council on Higher Education, acting through the HEQC, has responsibilities relating to programme accreditation, institutional audits, national reviews and qualification standards. The Higher Education Qualifications Sub-Framework situates awards within the national framework, while the Quality Assurance Framework envisages a stronger role for robust institutional internal QA and differentiated external processes (Council on Higher Education, 2020, n.d.). The South African case shows why national accreditation systems should not be reduced to a universal checklist. Strong institutional internal assurance may justify different review arrangements, but it does not erase public responsibility for academic standards or qualification integrity.

Table 2.3

Comparative architecture of selected African higher-education quality-assurance systems

Jurisdiction and key authority	Principal legal or policy foundation	Distinctive focus of official architecture	Transferable lesson and limitation
Rwanda: HEC	Presidential Order No. 044/01 (2026); RQF (2021)	Accreditation, curriculum/programme approval, institutional monitoring, online provision and quality standards	Clear central mandate; detailed current guidance still requires version checks.
Kenya: CUE	Universities Act (2012); Universities Regulations (2014)	University and programme regulation, curriculum guidelines, inspection, published registers	Importance of articulated standards; 2026 consultation drafts are not enacted rules.
Ghana: GTEC	Education Regulatory Bodies Act, 2020 (Act 1023)	Tertiary institutional and programme accreditation; restrictions on unaccredited advertising	Public protection and verification of claims; legal specifics cannot be imported into Rwanda.
South Africa: CHE/HEQC	Higher Education Act (1997); HEQSF and QAF	Programme accreditation, institutional audits, qualification standards and evolving QA differentiation	Internal QA maturity matters; responsibilities are distributed across national structures.

Note. Author's documentary comparison of official national sources, not a comparative effectiveness ranking. Dates refer to principal instruments, not necessarily their most recent amendments.

The commonalities are substantive but limited. All four arrangements assign public significance to authorised qualifications; differentiate, in some manner, between institutional and programme credibility; recognise external evaluation; and use standards or qualification expectations to guide judgement. Each also faces pressure to govern increasingly flexible educational provision. The differences involve distribution of authority,

scope of institutional self-regulation, detailed accreditation procedures, terminology, qualification codes, documentation, sanctions and conditions. Those differences are not peripheral. They determine who may approve an award, what a provider must submit, what a reviewer may conclude and how an institution can contest a decision.

An additional methodological caution is needed where countries make different levels of documentation publicly visible. Kenya's CUE provides an official catalogue of approved institutions and academic programmes, including July 2026 status listings, while South Africa's CHE separates materials on programme accreditation, institutional audit and qualifications standards (Commission for University Education, n.d.; Council on Higher Education, n.d.). Such accessibility improves the inspectability of particular decisions, but it does not establish the relative effectiveness of national systems. Ghana's regulator similarly makes its mandate accessible while individual statutory and procedural claims require reference to the applicable legal instrument. Regulatory form, documentary transparency, degree completion and actual learning outcomes are different evaluative objects, and the available sources do not justify inferring national outcome rankings from their formal architectures.

Comparison consequently supports *functional transferability* rather than *regulatory transplantation*. Institutions can learn from a country's use of approved programme registers, public accreditation notices, evidence-based inspections, internal quality audits or professional reviewer calibration. They cannot treat another jurisdiction's credit formula, panel composition or decision category as legally applicable without national authorisation. A framework such as ETAJ is potentially useful across systems because it asks reviewers to establish authority, connect claims to evidence, explain inferential warrants and qualify uncertainty. Its specific rulebook and remedies must always be determined locally. This is a plausible analytical proposition, not evidence of measured improvement in reviewer consistency.

2.10 Continental and international reference frameworks

The search for African comparability is often presented as a choice between common continental rules and sovereign national systems. That dichotomy is misleading. A continentally useful quality architecture can identify comparable educational functions without assuming that legislatures, accreditation agencies, professional bodies, qualification frameworks and institutions have identical mandates. Regional instruments are particularly valuable as a language of mutual intelligibility, while national law determines the enforceable responsibilities of institutions operating in a given territory. Confusing these two levels undermines both harmonisation and the rule of law.

The ASG-QA are central to the African quality-assurance discussion. Developed through the HAQAA initiative, they group standards around institutional internal quality assurance, external quality assurance and the conduct of quality-assurance agencies. They address, among other matters, institutional quality policies, programme design, teaching and assessment, learner support, information management, public information, cyclical review, transparency and independence of external processes (HAQAA Initiative, 2018). Their distinctive contribution is not an attempt to issue accreditation decisions for all African universities. Rather, they create expectations against which systems can learn from one another and identify weaknesses in governance arrangements. The standards should consequently be used as a comparative and developmental benchmark unless domestic adoption or another valid legal act gives a particular provision specific legal force.

This distinction has significant implications for external reviewers. A finding framed as 'non-compliance with ASG-QA' may be professionally meaningful in an agreed voluntary evaluation, but it cannot automatically justify a sanction under Rwandan law. A defensible report should identify the applicable Rwandan requirement, cite

the relevant HEC or ministerial source, then use the ASG-QA, if helpful, to contextualise a recommendation about practice. This does not diminish the value of regional quality standards. It makes their contribution precise: they can strengthen institutional learning and expose policy gaps without creating fictional legal obligations.

Qualifications comparability is a distinct endeavour. The African Continental Qualifications Framework promotes transparency among different national frameworks, attention to learning outcomes, and mechanisms for recognition and mobility. Its validated policy development illustrates growing continental consensus around intelligible qualification descriptors, although implementation proceeds through multiple institutions and national processes rather than instant harmonisation (ACQF, 2023). The ACQF guidance on validation and recognition of learning is useful when designing RPL and credit-transfer systems because it highlights fair assessment of prior learning and transparent pathways (ACQF, 2022). Yet a continental-level descriptor is not a certificate of automatic equivalence. Similar levels can conceal material differences in programme scope, regulated professional practice, learning demand and institutional authorisation.

The UNESCO Addis Convention adds a legal dimension to recognition. Adopted in 2014 and in force internationally from 15 December 2019, the revised African convention provides a framework for fairer and more transparent recognition of higher-education qualifications among its parties (UNESCO, 2014). Importantly, entry into force of a treaty does not mean that every African state has consented to be bound by it. UNESCO's published states-parties information does not identify Rwanda, Kenya or Ghana as parties in the list consulted for this chapter; South Africa appears on that list (UNESCO, 2014). The existence of an African treaty therefore cannot justify saying that all Rwandan institutions or employers are obliged to recognise any degree awarded elsewhere in Africa. Applicable domestic recognition rules and verified treaty status remain decisive.

Other international benchmarks can assist quality evaluation without constituting Rwandan accreditation law. UNESCO's education-technology analysis stresses that effectiveness, equity, affordability and evidence should guide technological decisions (UNESCO, 2023). International discussion of micro-credentials raises important questions about quality, documentation and portability, but no generic global label makes an online short course automatically credit-bearing. Professional accreditation frameworks may introduce discipline-specific criteria for engineering, medicine, nursing or education, but their application depends on the relevant professional and national arrangements. A responsible comparative approach first states the educational principle, then identifies whether that principle has an enforceable local expression.

One consequence is that *mutual intelligibility* should be distinguished from *mutual recognition*. Two countries may use comparable qualifications terminology without legally recognising each other's awards; two professional communities may agree on similar competencies without granting reciprocal licence to practise; and two universities may accept exchange credits without being authorised to confer each other's degrees. Regional harmonisation is successful when it improves the ability to examine these differences fairly and transparently, not when it masks them behind a common vocabulary. Accurate documentation of levels, workload, outcomes, accreditation and academic transcripts is a practical contribution each institution can make to this objective.

2.11 Cross-border programmes, prior learning, transnational education and emerging credentials

Contemporary higher education increasingly crosses borders through physical branch campuses, franchise arrangements, joint and dual awards, remote supervision, international curricula, online learning and the recruitment of students residing outside the awarding institution's jurisdiction. The educational possibilities are significant. Such arrangements can extend specialist expertise, provide flexible access and support regional

research networks. They also create jurisdictional ambiguity about who is responsible for academic standards, where assessment occurs, whose data law applies and which authority may authorise or investigate provision. Quality assurance must therefore examine the *location and control of educational functions*, not merely the country printed on a diploma.

Article 6 of Rwanda's 2026 HEC governing order is particularly relevant because it expressly addresses institutions offering international curricula, international academic programmes and online programmes in Rwanda, alongside recognition of foreign qualifications and oversight of certain recruitment activities (Republic of Rwanda, 2026). A university established abroad should not assume that a foreign incorporation certificate, a home-country accreditation statement or an international membership automatically authorises it to conduct regulated higher-education operations within Rwanda. The reverse caution also applies: a Rwandan institution proposing to teach abroad needs to examine the host country's legal requirements rather than treating Rwandan approval as universal permission.

Cross-border activity should be analysed through three legally separate locations: the jurisdiction where the awarding institution is established, the jurisdiction where teaching or learner services are materially provided, and the jurisdiction in which the resulting qualification is later submitted for recognition or professional licensing. These locations may differ even where all academic interaction takes place over the internet. An overseas provider enrolling learners in Rwanda does not necessarily have the same legal footprint as a provider operating a local teaching centre or using local agents, and no categorical answer should be invented without applying the current law to the arrangement's facts. A compliance assessment therefore records advertising and recruitment activity, contractual jurisdiction, payment destination, learner-support location, assessment and examination sites, award issuance and the nature of any local partnership. The result should identify issues requiring a formal ruling rather than label every cross-border enrolment automatically permitted or prohibited.

For any collaborative programme, the initial diligence exercise should identify the actual provider, award-granting institution, partner institutions, locations of enrolment and teaching, the legal jurisdiction of student contracts, responsibility for assessment, ownership of academic records, financial flows and the route for complaints. It should further establish who employs or supervises teaching staff, who manages research ethics, what happens if a partner withdraws, and what evidence the student will receive concerning the recognised status of the award. A partnership agreement that identifies only revenue shares or marketing responsibilities is inadequate for educational accountability. Clear academic responsibility must survive the relationship's possible termination.

Joint awards and dual degrees involve different risks. A joint degree normally represents an integrated award arrangement under the institutions' applicable authorities, whereas a dual degree may confer two awards subject to separate academic and regulatory requirements. The existence of shared teaching does not automatically authorise either result. Programme teams must establish double-counting rules, credit acceptance, quality responsibility, assessment consistency, student appeal routes and whether one learning activity is intended to support two separate award claims. Where a qualification permits collaboration, documentary clarity is necessary to prevent students being promised awards that one partner lacks authority to confer.

Recognition of foreign qualifications should also be distinguished from accreditation of the institution offering them. HEC's mandate includes recognition-related functions, and its published equivalence service is a route through which applicants may seek an authorised evaluation of foreign awards (Republic of Rwanda, 2026; Higher Education Council, n.d.-b). An equivalence decision concerns a particular credential and its recognition under applicable rules; it does not retroactively grant local authorisation for a foreign provider to recruit or

teach unlawfully, nor does it automatically confer a professional licence. Applicants, employers and universities should verify the purpose and limitations of the specific recognition outcome.

Recognition of prior learning has similar evidentiary demands within a programme. A professionally experienced applicant might demonstrate some learning outcomes through a portfolio, professional artefacts, supervised challenge assessment or oral examination. The institution must assess authenticity, currency, scope and level, and record precisely which learning outcomes are satisfied. Its rules should also address partial recognition, reassessment, appeals and remaining learning requirements. The goal is not to exchange academic credit for a narrative of experience, but to recognise achievement wherever it was legitimately acquired. In a digitally enabled system, secure electronic portfolios can assist evidence collection, but automated matching of occupational descriptions to credits remains insufficient without defensible academic judgement.

Micro-credentials, professional certificates, badges and short online courses require similarly explicit categorisation. A certificate of attendance verifies participation in a specified event, not necessarily assessed competence. An assessed micro-credential may document a bounded achievement, but whether it carries RQF credits, contributes to an accredited award, or may be transferred depends on the approved qualification and institutional or regulatory rules. HEC's July 2026 postgraduate framework distinguishes non-credit certificates of participation from credit-bearing postgraduate components and requires clarity about the status of such credentials (Higher Education Council, 2026b). Institutions should avoid language implying that certificates may be stacked indefinitely into a master's or doctorate without an approved pathway, agreed equivalence rules and a valid award decision.

Recognition and transnational provision raise a broader question of *credential trust*. Trust depends not only on the claim that a qualification is accredited, but on the ability to establish who awarded it, under what authority, at which level, through what programme and assessment, and with what verification record. Digital credential platforms may improve authenticity and portability, provided that they preserve authoritative issuance, access control, revocation mechanisms, privacy, long-term verification and an explanation of the credential's academic meaning. A cryptographically verified certificate can authenticate that a record was issued, but cannot by itself prove that the underlying educational programme was rigorous. Technical authentication and educational legitimacy are distinct evaluative questions.

2.12 Regulatory uncertainty, policy change, conflicting provisions and documentary provenance

Regulatory uncertainty does not arise only because rules are vague. It can be generated by multiple versions of official documents, mismatches between webpage labels and instrument dates, legacy guidance that remains downloadable, instruments operating at different levels of authority, overlapping disciplinary requirements and changes whose transitional effect is not explicitly stated. The risk is particularly acute in developing programme submissions, where a seemingly minor error in legal provenance can lead to an incorrect standard being applied to several years of teaching. Professionals should therefore adopt a disciplined documentary method rather than rely on remembered practice or a single website screenshot.

The legal update of July 2026 provides one test case. Presidential Order No. 044/01 is an officially gazetted governing instrument; its Article 26 repeals most provisions of the older 2020 presidential order. A report issued after 30 July 2026 should identify this change, cite the current order for the matters it now governs, and avoid asserting that the earlier order's repealed provisions remain binding. By contrast, it would be equally unsound to infer that every subordinate HEC guideline issued before July 2026 automatically became void. Its continued status depends on enabling law, compatibility, express repeal and authoritative institutional

interpretation. Repeal at one hierarchical level does not justify either blanket survival or blanket invalidation of all older subordinate instruments.

A second test case is the programme validation document marked *Revised April 2007* but made available through a website entry with a 2024 modification date. The first date describes the document's own revision history; the second may describe a later upload or website administration. Neither establishes, by itself, whether the described procedure is currently required for every institution. A rigorous evaluator can use the document to understand a recognised validation model, but should record its historical date and seek a current confirmation before using an individual step as a decisive legal ground. This principle prevents the particularly damaging practice of treating upload metadata as enactment metadata.

A third test case concerns the interface between the RQF's general credit model and the July 2026 postgraduate framework, posted online in October's statements about doctoral duration and credits. A technically persuasive but legally unsafe response would be to impose one's own algebraic interpretation and reject every programme not conforming to it. The proper response is to preserve both quotations in the review record, identify differences in document type and purpose, examine any express hierarchy or transitional clause, inspect the programme's approval conditions, and request authoritative clarification where the outcome materially depends on the uncertainty. Pending clarification, the reviewer may assess curriculum coherence and evident workload without pretending to have settled the disputed norm.

Figure 2.1

Regulatory provenance and evidence-traceable evaluation pathway



Note. Original conceptual synthesis extending the provenance and evidentiary logic of Sangwa (2026a). The figure is a proposed professional decision process; it does not assign new powers to institutional committees or external evaluators.

The figure separates six questions often collapsed in practice. First, what is the exact claim to be assessed? Second, which presently applicable authority governs it? Third, which criterion follows from that authority? Fourth, which evidence has appropriate authenticity, relevance and currency? Fifth, what reasoned inferential step connects evidence to compliance or deficiency? Sixth, which official actor may make a decision, and what uncertainty, procedural protections or corrective action must accompany it? A source register should attach an immutable identifier and version record to each relevant item so the reasoning can be reconstructed later. This

principle is consistent with ETAJ's normative-authority-to-decision logic, without implying that ETAJ has yet been independently validated (Sangwa, 2026a).

Table 2.4

Rwanda Higher Education Regulatory and Accreditation Reference Matrix: proposed core register

Source and issuing authority	Normative status and principal scope	Evidence relevant to institutional review	Verification and use instruction (17 October 2026)
Presidential Order No. 044/01 (Republic of Rwanda, 2026)	**Binding law:** HEC mission, powers, programme and institutional oversight	Accreditation/approval decisions, standards, institutional monitoring records	**Primary legal text verified.** Check arts. 4-7 and 26-28; do not rely only on repealed 2020 provisions.
Law No. 010/2021 determining organisation of education (Republic of Rwanda, 2021a)	**Binding law:** educational organisation and statutory framework	Institutional legal status, relevant academic governance, qualifications compliance	**Identified official law.** Verify individual article and any amendment before applying.
Ministerial Order No. 003/MINEDUC/2021 and RQF (Republic of Rwanda, 2021b)	**Binding ministerial instrument:** qualification levels, credits and descriptors	Programme outcomes, level matrix, notional-hour analysis, progression rules	**Official annex verified:** §5.2 gives 1 credit/10 hours and 120-credit annual reference.
Law No. 058/2021 on personal data and privacy (Republic of Rwanda, 2021c)	**Binding law:** data processing, controllers, processors and privacy	Student-data inventory, lawful basis, contracts, assessment and analytics controls	**Official law verified.** Examine activities and statutory scope rather than relying on generic privacy policy.
Student Admission Policy (HEC, 2025a)	Official national admissions policy; revised January 2025	Entry criteria, prerequisites, admissions and transition records	Text's 2020 HEC citation is historical; verify its operative application with current rules.
Appeals and Complaints Procedures (HEC, 2025b)	Official administrative procedures; dated December 2025	Accreditation decision, appeal grounds, correspondence, review file	Uploaded March 2026; ascertain current route, time limits and applicability.
Industrial Attachment Guidelines (HEC, 2021b)	Official attachment guidance; dated 2021	Approved placement agreements, supervision, student safeguards and assessment	Listed online September 2026; publication date is not the upload date.
HEC Accreditation Process portal (HEC, n.d.-a)	**Official procedural access point:** applications, review, forms and related links	Institution/qualification status, submitted dossier and authorisation	**Current page verified.** Confirm each linked instrument's substantive date and legal currency.
Procedures for Validation of Modules and Programmes (HEC, 2007)	**Legacy official procedure:** described internal programme-validation stages	Proposal, module descriptions, specification, committee and senate records	**Original text marked revised April 2007.** Present-day mandatory scope requires confirmation.
IQA Guidelines (HEC, 2021a)	**Official QA guidance:** institutional internal assurance arrangements	QA policy, annual monitoring, review and corrective-action evidence	**Official HEC listing identified.** Confirm applicable revision and binding adoption conditions.
Virtual Learning and AI Guidelines (HEC, 2025c)	**Official modality assessment guidance:** ICT-integrated, blended, online, distance and AI	Course and LMS audit, AI rules, staffing, content, accessibility, assessment safeguards	**Official PDF verified.** Establish its interaction with March 2026 guidance in each case.

Source and issuing authority	Normative status and principal scope	Evidence relevant to institutional review	Verification and use instruction (17 October 2026)
Distance Learning Guidelines (HEC, 2026a)	**Official assessment guidance:** digital infrastructure, invigilation, support and governance	Operational tests, proctoring arrangements, instructional design, delivery policy	**March 2026 text verified.** Check whether criterion is applicable to particular modality and approval.
Postgraduate Degree Framework (HEC, 2026b)	**Official postgraduate framework:** master's and doctoral programme requirements	Level and credits, supervision, candidature, research outputs, examination rules	**July 2026 document; listed in October 2026.** Flag doctoral duration/credit interaction with 2021 RQF for clarification.
Rwanda Higher Education Strategic Plan 2025-2030 (HEC, 2026c)	**Strategic policy:** national priorities and institutional system development	Mission rationale, institutional plans and performance targets	**HEC policy listing verified.** Strategic objective is not automatically an accreditation condition.
ASG-QA (HAQAA Initiative, 2018)	**Continental professional benchmark:** internal, external and agency QA	Comparative QA gap analysis and voluntary enhancement plan	**Official HAQAA source verified.** Not automatically binding domestic law.

Note. Original reference matrix. **Verified** denotes that the identified text or official portal was available and inspected for the stated purpose; it does not mean that every provision's applicability to a particular institution has been certified by HEC. A working institutional version should add source URL, article/section, release and effective dates, supersession, affected programme, owner, evidence identifier, decision record, reviewer, next check date and written legal clarification as relevant. Bibliographic year labels distinguish different HEC publications, not a ranking of their legal force.

A hypothetical programme-review illustration demonstrates why these fields matter. Suppose an institution proposes to transfer an approved face-to-face Bachelor of Science programme into a predominantly online mode while preserving its degree title and credit total. The institution cites its existing programme approval, uploads a new LMS course shell, and asserts that no new authorisation is needed because the academic outcomes remain unchanged. The original authorisation is relevant evidence that a programme was approved in a specified form; it does not by itself establish approval for materially different delivery. Under the 2026 HEC governing order and the published 2025 and 2026 digital-learning guidance, the reviewer should first verify the decision scope, inspect whether current modality-specific expectations are applicable, seek proof of laboratory and assessment arrangements, and identify the competent authority for change approval. Without these checks the finding should not state either 'fully compliant' or 'unlawful' as a matter of inference alone. It should specify the missing authorisation or interpretation, explain the educational risk, request verifiable clarification, and protect students already recruited from misleading communications. This example is entirely hypothetical and records no finding about an actual university.

The matrix serves a different purpose from an ordinary bibliography. Bibliographies identify sources that support an argument; regulatory registers preserve the provenance and operational use of each rule. For professional review, each extracted requirement should link to a specified source passage, its original issuing authority, a version identifier and the claim it is being used to test. An institution may attach its programme documents, approval letters and verification records to these entries, but should not overwrite earlier decisions when a new regulatory version is issued. The resulting trail allows future reviewers to distinguish whether a discrepancy arose from institutional non-compliance, a change in rules, an obsolete form, or an interpretation later clarified by the competent authority.

Regulatory registers also benefit from separating *source identity* from *rule extraction*. One presidential order can contain multiple independently applicable provisions, and a single accreditation finding may depend upon more

than one instrument. A controlled register should accordingly assign a persistent source identifier to the original document and a distinct requirement identifier to every provision used for review. Each extracted rule should record its exact clause, legal status, effective date, affected cohort and delivery mode, the interpretation adopted, any competing interpretation and the date of the last verification. A programme-evidence record then links one or more requirements to a precise curriculum version, staff deployment, approved policy or verification result. This relational design prevents an update to one requirement from silently rewriting historical evidence or obscuring the normative basis of an earlier decision.

A reliable provenance protocol proceeds through five linked tests. **Authenticity** asks whether the item originates from an authoritative source rather than an unofficial reproduction. **Authority** asks whether the issuer was legally competent to establish the alleged requirement. **Temporal validity** records publication, commencement, amendment, withdrawal and supersession. **Applicability** asks whether the text governs the institution, award, cohort, campus, modality and decision at issue. **Interpretive sufficiency** asks whether the cited passage unambiguously supports the finding or requires specialist clarification. These tests are analytically separable even when a professional officer completes them in one review. Their purpose is to prevent a familiar document, however persuasive, from displacing the actual normative ground.

Uncertainty should be documented rather than concealed. An evidence register can classify a provision as *verified and applicable*, *verified but interpretation unresolved*, *historical or superseded*, *draft or under consultation*, *non-binding comparator*, or *not yet verified*. These are proposed administrative classifications, not HEC legal categories. For unresolved material questions, the institution should preserve its interpretation, relevant evidence, risk implications and correspondence seeking clarification. A cautious reviewer can formulate a conditional or limited finding while avoiding an invented rule. Such disciplined uncertainty is not weakness; it is a safeguard against arbitrary evaluation.

2.13 Strengthening Rwanda's regulatory and institutional quality-assurance practices

Rwanda's current framework provides important legal and technical foundations for quality governance. The 2026 presidential order clarifies and extends HEC's contemporary mandate; the RQF articulates national qualification standards; and published guidance addresses internal assurance, distance learning, virtual modalities, AI and postgraduate education. The remaining professional challenge is how these instruments are used together. A regulator can make individual requirements more intelligible, and institutions can improve their own compliance and educational capability, without first undertaking a complete structural reorganisation of the higher-education system.

A first opportunity is *authoritative consolidation*. HEC could maintain a clearly versioned, publicly searchable register distinguishing in-force legal instruments, current accreditation standards, official guidelines, superseded procedures, consultation drafts and explanatory materials. Each record would identify issue date, effective date, legal foundation, affected activities, amendments and interpretation notes. The public availability of a PDF is valuable, but a reader also needs to know what it supersedes and to whom it applies. Where older materials are retained for historical continuity, prominent archival labels could prevent accidental use as current controlling criteria. For institutions, the equivalent responsibility is to maintain a local standards register owned jointly by academic quality and legal or compliance functions, with periodic review rather than a spreadsheet updated only before inspections.

A second opportunity is *qualification and curriculum control*. HEC and universities would benefit from harmonised data fields connecting award level, credit totals, notional hours, programme duration, delivery mode, approved programme version, core outcomes and responsible academic body. Such a system need not

impose one technological product or template on every institution. Functional interoperability matters more than uniform software. The essential capability is to reconcile the qualification offered in marketing materials, the curriculum approved by the academic body, the submission reviewed by HEC, the programme configured in the learning environment, and the award eventually recorded on a transcript. Disagreement among these representations should trigger controlled correction rather than informal alteration.

A third opportunity is *proportionate modality-specific assurance*. Online and blended programmes should be evaluated through realistic demonstrations of content accessibility, staff capacity, meaningful interaction, authentic assessment, learner support, information security and continuity. Practical and regulated professional disciplines require additional safeguards relevant to supervised performance. At the same time, there should be space for functionally equivalent low-bandwidth approaches and affordable delivery arrangements that achieve the underlying educational purpose. Quality would be weakened if one expensive procurement model were treated as a universal standard without examining alternative means. Conversely, resource constraints cannot justify the absence of non-negotiable competence, safety or learner-protection conditions.

A fourth opportunity is *documented regulatory interpretation*. Questions involving overlapping HEC guidance, new postgraduate pathways, programme modifications, foreign-provider activities or unusual credit arrangements will arise even in well-designed systems. Universities should not resolve these questions solely through internal assertion, and reviewers should not rely on private preferences. A formal route for reasoned clarification, interpretive circulars or published frequently asked questions, alongside applicable appeals and complaint procedures, can increase consistency and fairness. Where a clarification changes prior practice, transitional treatment of students already enrolled should be made explicit. Predictability reduces avoidable conflict while preserving regulatory discretion where the law legitimately allows it.

A feasible improvement programme can be staged without confusing its timetable with a statutory rule. During a first institutional review cycle, each programme owner could reconcile its official approval record, definitive programme specification, RQF level, credits, admission rules, delivery mode and current curriculum. A second cycle could test whether material programme changes have passed through the appropriate authorisation route and whether corrections were verified rather than merely signed off. A further periodic check would examine whether student outcomes, moderation results, staff deployment and learner complaints reveal persistent problems despite apparently complete paperwork. These are proposed institutional controls whose workload and sequencing must be adapted to capacity and educational risk.

A fifth opportunity is *reviewer calibration and epistemic accountability*. Reviewers assessing the same programme need a shared understanding of the applicable standard, the evidentiary burden and the distinction between substantive deficiency and documentary insufficiency. Training could use anonymised or hypothetical dossiers, independently generated provisional findings, comparison of warrants and structured discussion of uncertainty. For example, a curriculum containing the expected 480 credits may still schedule them implausibly over three years; a module list may cover major marketing topics but lack adequate research and professional progression; an online programme may have an LMS licence without a functioning assessment environment. Such cases test whether evaluators can defend their conclusions without introducing unsupported rules. Whether calibration actually improves inter-rater reliability is an empirical question requiring testing, not a result that can be claimed from the existence of a workshop.

Finally, strengthening QA requires better *post-approval learning*. Monitoring data, assessment moderation, complaints, student progression, graduate feedback, cybersecurity events and programme reviews should be used to establish whether approved commitments were fulfilled and whether corrective action made a measurable difference. Not every available performance indicator is valid evidence of quality: LMS clicks do not

measure mastery, employment figures do not independently measure educational value, and the closure of an action item does not automatically mean that the underlying problem was solved. A credible cycle asks what was promised, what was implemented, which evidence was verified, what remains uncertain and what should change. This logic is the regulatory foundation of the book's proposed Integrated Evidence-Traceable Quality Governance (IETQG) framework, whose conceptual promise still requires independent testing and contextual adaptation (Sangwa, 2026a).

An implementation pathway should be staged. In the near term, institutions can complete a provenance audit, reconcile their programme master records and identify missing authorisations or unclear versions. In the medium term, they can improve curriculum change control, evidence registers, staff preparation and modality-specific quality reviews. Over the longer term, HEC and universities can evaluate whether common data definitions, calibration practices and digital interfaces reduce error and improve decisions. This approach does not assume that more regulation always yields better education. It treats transparency, usability, public accountability and tested institutional capability as mutually necessary conditions for regulatory legitimacy.

2.14 Conclusion: Regulation as a foundation for credible educational quality

This chapter has shown that higher-education regulation is not an administrative appendix to curriculum development. It establishes the legitimate conditions under which institutions operate, qualifications are offered, academic programmes are approved, learners are protected and public claims about educational standards can be trusted. Yet regulatory conformity remains only one dimension of quality. The existence of a law, institutional charter, approved curriculum or accreditation decision cannot establish that teaching is effective, resources are available, assessments are valid or academic promises remain sustainable. Those are questions of implementation and continuing verification.

Rwanda illustrates the importance of documentary precision. Presidential Order No. 044/01 of July 2026 provides the current governing account of HEC's mandate and repeals most of the relevant 2020 order. The 2021 RQF supplies formal qualification and credit expectations, while HEC's more recent virtual-learning, distance-learning and postgraduate documents introduce increasingly specific requirements for contemporary provision. These sources should not be flattened into one undifferentiated checklist. Their legal force, temporal status, scope and relationship must be established before an institution or evaluator applies them to a particular programme. The tension between the general annual credit reference and the 2026 doctoral framework is an instructive example of why interpretation should be recorded and, where necessary, clarified by the competent authority rather than concealed behind apparently tidy arithmetic.

Comparison with Kenya, Ghana, South Africa and continental frameworks confirms the value of shared quality-governance principles but not the existence of a universal African regulatory procedure. Accountability, qualification integrity, programme coherence, credible evidence, independent review and continuing enhancement recur across different statutory architectures. What remains local is the distribution of powers, the exact legal threshold, the responsible decision-maker, the procedure and the available remedy. The proposed regulatory reference matrix and provenance protocol translate this insight into a practical method for making academic evaluation more transparent and reviewable, without claiming regulator approval or empirical validation.

The logical next question is organisational rather than primarily legal. Once an institution has identified the rules governing its promises, does it possess the enduring governance, academic, financial, digital and evidentiary capabilities needed to fulfil them? That question leads from normative authority to the architecture

of institutional capability and sustainable educational quality, where compliance documents must be connected to people, resources, processes and actual educational work.

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