



RESPONSE TO PARLIAMENT QUESTIONS

BY

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MINISTER

NATIONAL ASSEMBLY

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I rise in this August House to respond to the question asked by **HON. WINNIE MOONGO** from **(PDM)**, concerning the Bachelor of Science in Public Health programme offered at the University of Namibia that raise concerns about governance, regulatory compliance, and accountability in our higher education system.

1: Honourable Minister, can you clarify why the University of Namibia implemented the Bachelor of Science in Public Health programme without obtaining prior approval from the Health Professions Council of Namibia, as required by Section 27 (1) of the Health Professions Act No. 16 of 2024

Honorable Speaker, Honourable Members,

As I responding to Hon. Moongo, the following are important to note and consider regarding the University of Namibia's (UNAM) **Bachelor of Science in Public Health** programme, in relation to the registrable status of the programme by the Health Professions Council of Namibia (HPCNA).

PART 7 of the Health Professions Act, No 16 of 2024, states that:
EDUCATION AND APPROVAL OF EDUCATIONAL INSTITUTIONS

Control over and approval of education:

27. (1) Despite any other law to the contrary, an educational institution in Namibia that intends to provide an education that enables a student to obtain a prescribed qualification and practise any profession to which this Act applies, must, under subsection (2), apply for the approval of the education that the applicant intends to provide.

Section 27(1) and Public Health

Section 27(1) of the Health Professions Act, 2024 applies only to professions that are *registrable* with the Health Professions Council of Namibia. Public Health is not such a profession to which the Act

applies. It is an academic and policy occupation, drawing on medicine, economics, and social sciences, and has no defined scope of practice under the Health Professions Council of Namibia.

Requiring Public Health programmes to seek approval under this section would be a misapplication of the law. It would extend HPCNA's powers beyond what Parliament intended.

Although it is ideal in future to include Public Health in the Health Professions Act, No. 16 2024, that process would require the review of the Act. As this is not a profession regulated by the Act, no approval was required.

2: Who within UNAM's governance structure, Faculty, Senate, or Council reviewed and approved the Bachelor of Science in Public Health curriculum, and were concerns regarding accreditation raised during this process?

Honourable Members,

UNAM's Senate approved the Curriculum. The HPCNA provided guidance, and the Ministry of Health and Social Services, provided support for the programme. The qualification also went through the benchmarking processes, Senate approval, and NQA registration.

The issue raised seems to be more about the assumption that having "Public Health" in the title automatically makes it registrable with a statutory body, which is not the case. (e.g., a Bachelor of Arts in Psychology does not make one a psychologist).

So, the concerns appear to have been raised internally during the registration/approval process specifically by committee structures, statutory consultations, and possibly the HPCNA/Ministry, who flagged that:

- The qualification of "Public Health" is not registrable with HPCNA, but do have a place in the health sector, as indicated by the Ministry of Health and Social services.

- Employment pathways exist outside statutory registration.

The Public Health System - According to the *Centres for Disease Control and Prevention (CDC)*, "Public health systems are commonly defined as 'all public, private, and voluntary entities that contribute to the delivery of essential public health services within a jurisdiction.'"

It focuses on populations, not individual patients, and typically involves:

- Health policy development
- Epidemiology and disease surveillance
- Health promotion and education
- Environmental and occupational health
- Research and programme management

This contrasts with clinical professions like medicine, dentistry, or nursing which deal with direct patient care. A Public Health degree is therefore an academic qualification, not a profession with a statutory scope of practice. Holders of Public Health degrees usually work in *policy, research, programme management, or advisory roles - not as independent clinical practitioners.*

Under the *Health Professions Act no.16 of 2024* there is a distinction between Professions vs. Qualifications:

According to the Act:

- A profession = a category listed in Schedule 1 with a defined scope of practice, subject to registration, licensing, and disciplinary oversight.
- A qualification = a course of study (section 27) that *enables* registration, but only if it leads to a recognised profession.

Public Health is not listed in Schedule 1, so even if a person has a degree in Public Health, there is no corresponding registerable profession under the Act. Registration with the Health Professions Council is not necessary for a holder of the Bachelor of Public Health as such person will work in policy, research, programme management, epidemiology etc.

3: Why was the Bachelor of Science in Public Health Curriculum programme phased out without a clear transitional or remedial plan for the students and graduates affected by its lack of recognition?

It is important to note Honourable Members that, from the onset that employment opportunities exist for graduates with a Public Health qualification. These graduates can work in different sectors namely:

1. Public Sector:

- MoHSS– Public health programmes, health policy, epidemiology, health promotion and so on.
- Regional and local health offices – health planning, disease surveillance, programme management.
- Government agencies involved in social services, health education, and community development.

2. Private Sector:

- NGOs and international organizations working in health and development.
- Private hospitals and clinics – health administration, health management roles.
- Research institutes and consulting firms – public health research, monitoring, and evaluation.

3. Academic & Research Sector:

- Universities or training institutions – teaching, research assistance, or programme development.

The broad fundamental basis of the qualification allowed graduates to pursue diverse roles, not strictly limited to statutory registration.

With regards to transition and phase-out concerns, I wish to state the following Honourable Members that:

- The qualification was phased out at the undergraduate level based on the UNAM curriculum transformation, programme restructuring, and need to align UNAM programmes to more registerable health professionals rather than providing a general qualification that does not require registration. However, there is still a postgraduate transition pathway, namely at master's or PhD levels for affected and new students.
- This transition ensured students could continue to build on their public health training despite the phase-out of the undergraduate programme.
- MoHSS provided clear support and recognition, through correspondence and supporting letters, acknowledging the qualification's value.

4: Has the Ministry, in collaboration with UNAM initiated formal engagements with the Health Professions Council of Namibia to address the regulatory gap and explore the pathways for the recognition of Bachelor of Science in Public Health graduates?

Honourable Members in Namibia, the Namibia Qualifications Authority (NQA) is the statutory body responsible for quality assurance in higher education and training. It accredits training providers, evaluates qualifications, and manages the National Qualifications Framework (NQF) of Namibia Qualifications Authority. UNAM offered a Bachelor of Science in Public Health (Honours), which was accredited by the NQA.

This programme is designed to equip students with the necessary skills and knowledge to address public health challenges within the country. It is not and was not registerable with any statutory body, even in SADEC countries like South Africa. There was and still is different pathways for students to explore within different sectors.

It was phased out because we are in the process of implementing specific professions registerable with the health professions council like for example Food Inspectors promulgated in the new Health Professions Act No.16 of 2024.

This initiative also forms part of UNAM's restructuring process and aligning with the needs of the country and specific in the health sector and focus on the needs of the country.

MoHSS made effort to support the inclusion of Public Health:

- UNAM received formal support from the MoHSS on 26 October 2015 to implement the Bachelor of Science in Public Health (Honours).
- The Ministry provided guidance when UNAM engaged the HPCNA.
- UNAM formally requested in 2018 that the Minister include Public Health in the new Health Act, No16 of 2024.
- The MoHSS consistently acknowledged and supported the value of Public Health qualifications, including during the phase-out process and in supporting postgraduate pathways.

However, despite these efforts, regulators repeatedly confirmed that *Public Health does not fall within the scope of registrable professions* under the Health Professions Act, No. 16 2024 due to its multidisciplinary nature and lack of a defined clinical practice. Therefore, the public health remained a Qualification not a profession, as indicated earlier.

Conclusion: The Ministry of Health and Social Services made reasonable efforts to include Public Health as a registrable profession, but legal and regulatory frameworks will not allow that based on the multidisciplinary nature of the programme.

5: What formal avenues exist for the affected graduates to engage with the Ministry, UNAM or the Health Professions Council of Namibia to advocate for the recognition of their qualifications or to participate in policy dialogue aimed at resolving this situation?

The Bachelor of Science in Public Health (Honours) and related postgraduate qualifications were fully recognised and registered in the NQF of the NQA. This ensures that the qualifications meet national and international standards and are formally accredited within the Namibian education system.

The dialogue regarding registration with the HPCNA has been ongoing since 2015. However, since Public Health does not fall within the scope of registrable professions under the Health Professions Act, No. 16 2024, due to its multidisciplinary nature and lack of a defined clinical scope; there is no dialogue to pursue. The qualification is recognized and registered on NQF.

As a result, students who complete these Public Health qualifications must pursue pathways to apply their knowledge within the public health sector. These include opportunities in government health programmes, regional and local health offices, NGOs, research institutions, and academia, as previously outlined.

Conclusion: While Public Health qualifications are formally recognised by the NQA and supported by the MoHSS, statutory registration under the HPCNA is not possible. Students are encouraged to leverage the broad applicability of their skills across diverse sectors.

6: Honourable Minister, how does the Ministry plan to address the employment challenges faced by the Bachelor of Science in Public Health graduates, who are unable to register with the Health Professions Council of Namibia and therefore, cannot secure positions within government health institutions?

MoHSS can ensure employment opportunities for Public Health graduates by strategically integrating them into existing and new

programmes within the public health sector. Specifically, the Ministry can:

1. Create designated positions for Public Health graduates within national, regional, and local health offices, focusing on areas such as:
 - Epidemiology and disease surveillance
 - Health policy and planning
 - Health promotion and community health programmes
 - Programme management and monitoring & evaluation
2. Leverage ongoing public health initiatives and projects to place graduates in roles that require data analysis, policy development, and health systems strengthening.
3. Facilitate career pathways and professional development programmes to enable graduates to progress into senior roles within the Ministry, ensuring long-term retention and impact.
4. Collaborate with other government agencies and departments involved in social services, health education, and community development to create cross-sectoral employment opportunities where public health skills are essential.
5. Provide recognition and formal inclusion of Public Health qualifications in job descriptions, recruitment advertisements, and Ministry human resources planning, ensuring graduates are eligible for positions that match their training.

By implementing these measures, the Ministry not only provides direct employment opportunities for Public Health graduates but also maximizes the impact of their skills in strengthening Namibia's health system. There are several graduates who has found employment with this degree.

Question 7: What lessons have been drawn from this regulatory failure, and what specific safeguard are being implemented by UNAM and the Ministry to ensure that no future programme is rolled out without recognition?

Firstly, this is not a regulatory failure and secondly not all academic programmes are subject to the professional regulatory requirements. In Namibia, the regulation and registration of qualifications is governed by multiple frameworks, each with specific mandates depending on the type of qualification, the sector, and the profession. Here's a structured overview:

1. Namibia Qualifications Authority (NQA)

- *Mandate:* The NQA is the statutory body responsible for quality assurance, accreditation, and registration of qualifications on the NQF.
- *Scope:* All academic and vocational qualifications, including undergraduate and postgraduate degrees, diplomas, and certificates offered by recognised institutions.
- *Key Functions:*
 - Accreditation of training providers and educational programmes
 - Registration of qualifications on the NQF
 - Quality assurance and benchmarking of programmes
- *Example:* UNAM's Bachelor of Science in Public Health (Honours) was registered on the NQA of the NQA.

2. Health Professions Council of Namibia (HPCNA)

- *Mandate:* Regulate the registration and practice of health professions listed under the Health Professions Act, No.16 of 2024.
- *Scope:* Clinical, diagnostic, and regulated health professions with defined scopes of practice.
- *Key Functions:*
 - Registration of professionals (e.g., doctors, nurses, environmental health practitioners)
 - Approval of educational programme that qualify graduates to register as professionals

- Enforcement of professional standards
- *In the case of Public Health:* It is multidisciplinary, and non-clinical fields such as Public Health are not registrable, as they do not have defined clinical scope and are outside the mandate of HPCNA.

3. Other Professional Regulatory Bodies

Certain professions have specific regulatory bodies outside the HPCNA framework, often created by statute. Examples include:

- Engineering Council of Namibia – registration of engineers and technologists
- Law Society of Namibia – registration of legal practitioners, etc.

In summary qualifications that are professions follow within a particular regulatory body:

- *Academic qualifications* → NQA (via NQF registration and accreditation)
- *Regulated health professions* → HPCNA or Allied Health Professions Council
- *Other professional qualifications* → Respective statutory councils or regulatory bodies

It is important to note that registration with a professional council is not automatic for a qualification that has academic recognition. For instance, a Public Health degree is academically registered with NQA but cannot be registered under HPCNA because it is multidisciplinary and non-clinical.

8: What is the Ministry's position on NSFAP loans granted to students in the non-recognised Bachelor of Science in Public Health programme, and what measures exist to recover or waive these loans to protect affected students?

The *Bachelor of Science in Public Health* is recognized by the relevant authority which is the NQA and the registered on the NQF of that authority. This was the basis of on which NSFAP funded

students who pursued that qualification. Therefore, such students have the contractual obligation to pay back their loans as per the stipulations of their contracts.

Honorable Speaker, Honourable Members,

In other words, students who received financial support from the NSFAP for a qualification that is not professionally registrable with a statutory body (e.g., HPCNA), such as Public Health, remain fully supported under existing policies, namely:

1. Academic Recognition:

- The qualification is fully recognized and registered with the NQA.
- NSFAP funding was provided based on the academic legitimacy of the programme based on meeting the NQA requirements, since non-professional academic qualifications, such as Public Health recognised in that manner and students who pursue such programmes are funded by NSFAP.

2. Non-Registrable Nature:

- While the programme is not registrable with the HPCNA, it remains a valid academic qualification, registered on NQF of the NQA. There are also employment opportunities for the holders of this degree.
- Graduates can pursue diverse career paths in government, NGOs, research, and academia. The qualification also provides a competitive advantage in employment compared to those without formal qualifications.

3. NSFAP Funding Principles:

- Funding for NQA-registered programmes is provided in good faith, upon meeting the set criteria.
- NSFAP is an inclusive mechanism that does not discriminate based on registrability with a professional body where it is not applicable.
- NSFAP provides funding if the qualification is legitimately registered with the relevant accreditation authorities.

Waiving fees for select graduates while excluding others with equally valid qualifications would constitute unfair discrimination.

This approach ensures fairness to all students while maintaining fiscal accountability and transparency in the administration of NSFAP funds.

Honourable Members,

Being in possession of a qualification does not automatically guarantee employment, even for registrable health professions, as public sector capacity is limited and aligned with the country's strategic health needs. Public Health professionals, while not clinicians, play a critical role in policy, programme management, research, and health system strengthening.

Ultimately, it is essential to align education, workforce planning, and policy provisions with Namibia's health priorities and broader development goals to ensure that qualified professionals can contribute meaningfully to the country's health system.

Finally, I wish to emphasize here, Hon. Moongo that UNAM does not offer uncredited programmes, as a matter of fact the National Council for Higher Education (NCHE) and the NQA has just concluded a Joint Institutional Accreditation of the University (this includes infrastructure and programmes) across all 14 campuses. This exercise involved international expertise, and it is the first of its kind in both public and private higher education institutions in Namibia.

This shows how robust the University programmes are and the institution's resolve to ensure alignment to the requirements of the regulatory bodies and National Development Plans (e.g., NDP 6 and Vision 2023).

I trust that I have adequately addressed your questions Hon. Moongo. If further clarity is required, that can be provided to you in person.

So I Submit.