



## **SUBMISSION ON THE DRAFT POLICY FOR THE PROVISION AND MANAGEMENT OF LEARNING AND TEACHING SUPPORT MATERIAL (LTSM)**

**Gazette No. 37976 dated 4 September 2014**

### **1. INTRODUCTION**

The Catholic Institute of Education and the Catholic Parliamentary Liaison Office welcome the opportunity to make a submission on the above mentioned policy. We will comment on sections according to the numbering of the draft policy and will also draw attention to any spelling or grammar mistakes present in the document.

### **2. GENERAL COMMENTS**

We recognise the fact that provision of quality LTSM is an integral and vital part of every education system and wish to emphasise that the implementation of this policy will ensure access and support the delivery of quality education for our learners.

### **3. COMMENTS ON EACH SECTION**

#### **3.1 SECTION 1 GLOSSARY AND INTRODUCTION**

We accept these two sections as they are.

#### **3.2 SECTION 3 BACKGROUND AND GUIDING PRINCIPLES**

We suggest that the opening statement under the heading 'Background' be rephrased. The statement should rather read: *The LTSM policy has been introduced to ensure that all the injustices and inequalities that persist within our education system, with regards to learner support, are addressed.* It is undisputable that the above mentioned anomalies were indeed inherited from our past but it would be advisable to recognise that these have continued to be part of our present reality.

We suggest that the Guiding Principles be numbered 4.1 to 4.7 to aid in referencing. We again suggest that under the heading Redress and Equity that the sentence: *Redress and equity within the LTSM provisioning are crucial, as the injustice of the past had to be corrected* be changed to say Redress and equity .....are crucial to the delivery of quality education. The reason for this is stated in the paragraph above.

The section headed *Social Cohesion* has grammar mistakes. The sentence:

Social cohesion requires and recognising the value of a functional LTSM provision in the building of community and social capital and reflecting the culture and values of the school and broader community should read:

*Social cohesion requires and **recognises** the value of functional LTSM provisioning in **order to build** community and social capital and **reflect** the culture and values of the school and broader community.*

We accept the rest of the section as is.

### 3.3 SECTIONS 5 and 6 VISION AND LEGISLATIVE CONTEXT

We suggest that the National Guidelines for the Minimum Schoolbag referred to under vision be provided as an addendum/appendix to this policy.

We accept the rest of these two sections as is.

### 3.4 SECTION 7 KEY ELEMENTS OF THE POLICY

#### 3.4.1 Section 7.1 Policy objectives

We accept this section as is.

#### 3.4.2 Section 7.2 Statements of Policy

While appreciating the cost involved in acquiring LTSM for all stakeholders - we believe that a minimum period of five years is a long time to retain a textbook in the National Catalogue. New material gets published annually and this would limit teachers and learners to textbooks that could be out of print and lacking in important new information as a result of their age. The minimum retention period should rather be three years and maximum five years.

#### 3.4.3 Section 7.3 Decentralised Development and Centralised Procurement

We welcome the idea of decentralised development and question the rationale behind centralised procurement. The acquisition of LTSM will certainly involve an enormous amount of money from both national and provincial budgets. We are particularly concerned about the danger of corruption at both levels. The value of a centralised contract, given the number of public schools in our country, will be high and much sort after. While centralisation for some aspects, e.g. text books, may be cost effective procurement of furniture, stationary and other LTSM should be decentralised. Decentralisation of the procurement process is essential to eliminate the risk of corruption and to also afford small and medium enterprises an opportunity to do business with the schools and thus promote business in more rural areas.

#### 3.4.4 Section 7.5 Intellectual Property

Commissioned/ state published material: It has happened that independent schools are normally excluded in the distribution of material commissioned by the department e. g. *Rainbow books*. The problem is the publishers have also been instructed not to sell the material to anyone and therefore block access to independent schools and thus negatively affecting their learner performance. The policy should stipulate how

this can be avoided in order to ensure equity and access to quality education for all our children. The department must consider supplying the material perhaps at a cost to such institutions playing a valuable role in our education system.

#### 3.4.5 Section 7.6 Quality Assurance

We acknowledge the departments' prerogative in deciding on the best LTSM for public schools but wish to urge that the process of quality assurance be as transparent as possible to avoid any manipulation by any party involved.

#### 3.4.6 Section 7.7 Processes for the development of a National Catalogue for Core LTSM

We welcome the multipronged approach in the development and provision of LTSM and also welcome *'the government's commitment to economic growth by implementing measures to advance the development of Small, Medium and Micro Enterprises and historically disadvantaged individuals'* which we emphasised in 3.3.1 above.

We wish to urge the department to consult widely before listing a publication in the National Catalogue. It is imperative that the consultation includes the teachers who will be using the material in the classroom.

We also submit that limiting each subject to one textbook per grade does not make pedagogical sense. The National Catalogue should list a number of books that are compliant with the requirements and afford the users a choice. It should be left to the discretion of that particular teacher to decide which textbook best suits their style of teaching. Teachers face a multiplicity of challenges in their respective classrooms from teaching inclusively for the gifted children and those considered to be slow learners. One textbook can hardly cover all these challenges at once. A minimum of three textbooks must be the norm.

On page 17 the first paragraph repeats the first paragraph on page 15.

#### 3.4.7 Section 7.8 Two Tier Procurement Approach

We have already commented on this at 3.4.3.

We note that the document does not stipulate any time frames as to when should schools order LTSM for the following year. In the interest of good planning and sound management it would be advisable to have some kind of regulatory date to facilitate this complicated process.

We welcome the formation of School LTSM Committee as this will go a long way to capacitating schools to take charge of their resources.

It has been our experience that a major challenge in schools has been when enrolment increases and schools are not able to access additional books. This aspect needs to be mentioned in the policy. The provincial LTSM committees would need to have a mechanism in place for this eventuality.

#### 3.4.8 Retention and retrieval

We agree and want to emphasise that schools have a great responsibility in ensuring that LTSM are looked after and kept in good useable conditions at all times. We however want to caution against the instruction given in Circular S12 of 2013 where principals were instructed not to give textbooks to learners who had not returned books from the previous year. It could be argued that this limits the child's right to education.

A substantial percentage of our schools are no-fee schools - how would we expect poor parents to replace lost textbooks? The department needs to develop together with schools a community based solution which guides principals in this regard. We appreciate the complexity of this situation and strongly support the need to teach teachers and young people responsibility.

We also wish to caution against the promise or implementation of incentives to schools that retain their LTSM efficiently. This does not send the correct message and undermines the professional responsibility of school leadership and teachers. Schools have to retain LTSM - it is their duty to do this and they should not expect a reward for carrying out their responsibilities.

#### 4. CONCLUSION

We welcome the development of this policy especially the monitoring aspect. We look forward to improved provision of LTSM in our schools.

Should any clarification from this submission be need please contact:

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## **The Catholic Institute of Education (CIE)**

The Catholic Institute of Education was established in 1985 by the Southern African Catholic Bishops' Conference. There are currently 174 395 children in 347 Catholic schools nationally. Of these schools, 260 are public schools on private property, mostly located in rural and peri-urban areas of South Africa. 91% of the children in these schools are black and previously disadvantaged and only 28% are of the Catholic faith.

CIE's projects are aimed at facilitating quality education for children in impoverished communities by responding to their physical, emotional and spiritual needs. For many of these learners, a quality education is their only escape from the cycle of poverty into which they are born.

## **The Catholic Parliamentary Liaison Office (CPLO)**

The Parliamentary Liaison Office (CPLO) of the Southern African Catholic Bishops' Conference (SACBC) is the official vehicle for contact and dialogue between the Catholic Church in South Africa on the one hand, and the country's Parliament and government on the other. It provides an avenue for the Church, as part of civil society, to contribute to debates on issues of public policy, to exert an influence for the common good in areas of political, economic and social concern, and to help shape legislative and policy developments.