



Southern African Catholic Bishops' Conference
PARLIAMENTARY LIAISON OFFICE



Submission to the

Department of Social Development

on the

Draft Early Childhood Development Policy

24th April 2015

Submission on the Draft National ECD Policy of the Republic of South Africa

The Southern African Catholic Bishops' Conference Parliamentary Liaison Office (CPLO) welcomes this opportunity to comment on the Draft National Early Childhood Development Strategy. ECD is fundamental to the successful implementation of the Children's Act. We note that many of the concerns that we raised in an earlier Submission have been addressed in this document.

We welcome the fact that the draft policy addresses a number of crosscutting service domains, i.e. health, nutrition, social protection, parental support and opportunities for learning. Also, much attention has been given to the costing of the different aspects of ECD services.

While we support, in general, the broad aims of the draft policy, we do have a few concerns. These are expressed in the table below:

NAME OF PERSON <i>(submitting the comments)</i>	NAME AND ADDRESS OF ORGANISATION AND CONTACT DETAILS <i>(including contact telephone number and email address - if available)</i>	DOCUMENT REFERENCE •HEADING •PARAGRAPH NUMBER •PAGE NUMBER •MATTER / ISSUE	PROPOSAL <i>(clearly states the comment, input or proposal that you propose)</i>	REASON FOR THE PROPOSAL <i>(Motive why you made the proposal in the previous column)</i>
Lois Law Kenny Pasensie	Catholic Parliamentary Liaison Office, 12 Bouquet Street, PO Box 2910 Cape Town 8000. Tel: 021-4611417 lois@cplo.org.za Kenny@cplo.org.za			
		General Comment	The successful rollout of the comprehensive and essential package of ECD services rests on the availability of human resources; however, the draft policy does not focus on the training of the professionals needed to implement to policy.	
		General Comment	Municipalities should be capacitated to perform their responsibilities as stipulated in the ECD policy.	Municipalities are underperforming in various areas.

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		National ECD Policy Goals, Short Term Goal. Page 51	The timeframe of 2015 for the establishment of a legal framework should be 2016.	The policy proposes the establishment of a legal framework by 2015. This is unrealistic as we are already entering the second half of 2015 and there is no draft legislation on the parliamentary programme for 2015.
		ECD Infrastructure. Page 111	The existing ECD centres that do not meet the requirements as stipulated in the Children's Act should be assisted to do so.	

For further information please contact:

Lois Law
Researcher
Catholic Parliamentary Liaison Office
12 Bouquet Street
Cape Town
8001
lois@cplo.org.za

Kenny Pasensie
Researcher
kenny@cplo.org.za