



Catholic Institute of Education

Catholic Parliamentary Liaison Office

12 Bouquet Street, Cape Town 8001

P O Box 2910, Cape Town 8000

Tel: +27 (0)21 461 1417

Fax: +27 (0)21 461 6961

e-mail: info@cie.org.za

website: www.cie.org.za

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SUBMISSION ON THE NATIONAL MINIMUM NORMS AND STANDARDS FOR SCHOOL FUNDING IN TERMS OF GOVERNMENT NOTICE 194 OF 12 March 2010.

Introduction

The Catholic Institute of Education welcomes the opportunity to comment on the national minimum norms and standards for school infrastructure in terms of government notice 194 of 2010.

We will provide some general comments and then recommendations to sections. Where there are no comments to clauses, these are supported in principle by the Catholic Institute of Education.

General Comments

We welcome the sentiments that underpin these changes to the norms and standards. While we welcome the inclusion of funding to special schools we are concerned that this clause will not sufficiently meet the requirements of this sector.

We welcome the intention to recognise Voluntary Governing Body Associations in order to fund training which they carry out, and the support which schools will be offered re membership fees. School Governing Bodies need support to develop their important function. We are however concerned about some of the terms in these clauses.

While the compensation for school fee exemptions is to be applauded we have serious reservations as to whether provincial departments will be able to budget adequately and fulfil their obligations in this regard. This policy does not necessarily compel provinces to budget adequately for this expenditure and there is a real concern that should they have budgetary constraints they will cut this item. We would therefore suggest that monies for fee compensation be a national disbursement which will compel provincial payment.

Specific comments

Section 4 A. FUNDING TO SPECIALS SCHOOLS

We welcome the clause on funding to special schools as this undoubtedly fills a gap in policy. However we are concerned with the wording of this clause. We suggest that this clause 4a (b) as it stands be scrapped. We object to the inclusion of this clause on the grounds that no national policy for funding to special schools exists. This clause allows for MECs to develop their own model of funding without reference to a national model of funding of special schools. This would lead to a wide variety of funding norms in the country rather than one based on national policy.

There is an urgent need to develop national norms and funding for special schools in order to provide a national model from which provinces can develop theirs.

We substituting clause 4A (b) with the following

While national policy is being developed, the MEC must determine the conditions and basis to fund such schools. Furthermore the PED must provide funding to special schools that is not less than x% of the funding provided to ordinary public schools”.

Section145A. RECOGNITION OF A VOLUNTARY ASSOCIATION REPRESENTING GOVERNING BODIES OF PUBLIC SCHOOLS FOR PURPOSE OF FUNDING

We understand and support the need for a regulatory framework, where one did not previously exist, to protect schools from unscrupulous ‘fly-by-night’ associations. The problem with clause (v) is that it places provincial membership basis on national governing body association. We suggest that this clause be scrapped.

The Catholic Institute of Education serves a specialised group of schools; some 248 public schools on private property and currently does governing body training in most of these schools. There is however no Catholic School Governing Body Association and should one exist it would never be able to fulfil the requirements of this clause. The CIE would however welcome the ability to access funds to continue their SGB training to support new SGB members.

SECTION145B. FUNDING TO SCHOOL GOVERNING BODIES AS CONTRIBUTION TOWARDS PAYMENT OF SUBSCRIPTION FEES TO A RECOGNISED VOLUNTARY ASSOCIATION REPRESENTING GOVERNING BODIES OF PUBLIC SCHOOLS

We welcome the contribution to schools for their subscription fees and the freedom it affords schools to choose which governing body association they affiliate to. We feel that the assistance should be the same for all schools regardless of quintiles.

Section145C FUNDING TO SGB ASSOCIATIONS FOR CAPACITY BUILDING

Given that the state will be funding this training we are concerned that there is no mechanism in this clause for the monitoring and reporting of training that is carried out. Quality assurance of any training is important.

(b) We suggest the following addition (in bold)... a management checklist must be developed by the HoD as part of the conditions for eligibility to receive funding **after consultation with school governing body associations.**

- However it must be pointed out that this will lead to nine possible different checklists. Having had experience with management checklists for funding subsidies for independent schools we are only too aware of differing provincial competencies and understanding of the norms and standards. We therefore suggest that a national pro forma checklist be made available to provinces.

Furthermore we are concerned that provincial departments continue to fulfil their own function with regard to governing body training. Training by SGB Associations should complement not supplement PED training. To this end we suggest the inclusion of a further clause:

(f) In the absence of a school belonging to an association the PED must provide school governing body training.

Section107A COMPENSATION FOR FEE EXEMPTIONS

We welcome this important clause as the exemption of school fees has been fraught with problems. We understand the need for a clear funding formula but find that the table 107A (vii) outlining these contains errors. The second column refers to a learner's identity number. Given that many learners do not have birth certificates, and hence no identity number, we suggest that this be replaced with the learner's Lurtiz number.

Furthermore the misleading wording in column three implies that funding is tied to school attendance instead of the number of days which the learner was enrolled at the school in a particular year (this allows for learner movement from one school to another). Learner attendance can in no way be tied to fee compensation.

The deadline of the 31 January each year is too early. We recommend that the date be moved to 30 June which will necessitate the movement of the payment of compensation date (170A(vi)).

(ix) This example is unclear and it needs to be refined.