

## **EASTERN CAPE EARLY CHILDHOOD DEVELOPMENT FORUM**

c/o ITEC

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The Deputy Director-General

Welfare Services

Department of Social Development

134 Pretorius Street

Pretoria

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**Attention: Ms Motlapele Ntswane**

Via email: MotlapeleN@dsd.gov.za

### **EASTERN CAPE ECD FORUM COMMENTS ON DRAFT NATIONAL ECD POLICY – APRIL 2015**

Name of Person Submitting Comments:

Michele Kay, Chairperson, Eastern Cape ECD Forum

Name and Address of Organisation and Contact Details:

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## **PREAMBLE:**

The **Eastern Cape ECD Forum** is a provincial, multi-stakeholder and inter-sectoral grouping of ECD stakeholders that is passionate about ECD within the Eastern Cape. With over 200 stakeholders, we value the diversity of Forum participants who include;

- Organised provincial & local structures including the Network of ECD Training Agencies – Eastern Cape (NECTA), SA Congress for ECD, Buffalo City Child Care & Development Association (BCCCCDA), Eastern Cape NGO Coalition (ECNGOC), Border Kei Chamber of Business (BKCOB).
- International, national and provincial funding and development Agencies, Trusts and Foundations
- Provincial & local education sector participants include SETAs, TVET Colleges, Universities and Training Providers
- Local government role-players – DLGTA, SALGA with some municipal representation.
- Key provincial government departments of DSD, DOH and DOE

The Eastern Cape ECD Forum was initiated in May 2012, when its first meeting was held following a need for sector-wide dialogue and collaboration within the province. The Forum focuses on the following key objectives:

- To provide a platform to facilitate inter-sectoral dialogue among ECD stakeholders
- To promote collaboration among ECD stakeholders
- To facilitate ECD information sharing & knowledge building opportunities
- To advocate for quality ECD for all children in the Eastern Cape

The Forum is not formally registered and all secretariat support is provided by ITEC (Institute of Training and Education for Capacity Building). The Forum has an elected Task Team which serves as the leadership of the structure and comprises individuals from key ECD stakeholders as follows: Michele Kay, ITEC, Chairperson; Nosipho Nkalitshana – Department of Social Development; Zukiswe Mabece – Department of Health; Sibusisiwe Tachie – Department of Education; Luvo Gazi – ETDP Sectoral Education & Training Authority; Ruth Faku – ECD Congress; Nokuvela Maninjwa – National Development Agency; Rene King – Network of ECD Training Agencies (Eastern Cape); Barbara Valentine – Secretariat Support - ITEC.

**COMMENT** - note the comments below were compiled by the EC ECD Forum Chairperson after an open process of collecting comments from Forum participants. The views contained in the comments do not represent the views of any one individual stakeholder or organisation but rather the overall views of the EC ECD Forum as a whole.

The ECD Forum supports the policy shift towards ECD as a universal right and developmental good and commends the GRSA on the progressive and positive Draft ECD Policy which locates young children at the centre of socio-economic development in South Africa. Our comments submitted below indicate our strong support for certain aspects of the Draft Policy, while we also take the opportunity to highlight areas of concern within the document and where we would request additional consideration and review. We value the opportunity to submit our comments and look forward to further engagement and feedback on our comments.

<b>COMMENT 1</b>
<b>DOCUMENT REFERENCE</b>
Section 1 – Introduction 1.3.1 The GRSA’s recognition of ECD as a universal right and developmental good Pg no. 23; Para. 1
<b>PROPOSAL</b>
The EC ECD Forum wholeheartedly supports the GRSA’s shift towards locating ECD as a universal right and developmental good.
<b>REASON FOR THE PROPOSAL</b>
This shift elevates the rights and status of the young child and the realisation of these rights has the potential to positively transform the lives of children, families and society as a whole.

<b>COMMENT 2</b>
<b>DOCUMENT REFERENCE</b>
Section 1 – Introduction 1.3.2 Public provision of universal ECD and associated responsibilities Pg no. 25; Para. 6
<b>PROPOSAL</b>
The EC ECD forum proposes that the following wording from the policy document be revised - “The GRSA must ensure that high quality services are available to all children whose parents wish them to use it.”
<b>REASON FOR THE PROPOSAL</b>
This statement creates a potential barrier for children to realise their ECD rights should the parent choose not to use any of the ECD services available. ECD is a right not a choice. Perhaps the choice of parents pertains more to ECCE (Early Childhood Care and Education or opportunities for learning) where the parent can choose the nature of the ECCE opportunity best suited to their child and family situation.

<b>COMMENT 3</b>
<b>DOCUMENT REFERENCE</b>
Section 4 – Purpose, Vision and Principles of the national ECD Policy 4.4 National ECD Policy Goals Pg no. 51; Para. 4
<b>PROPOSAL</b>
The time frames for the short-term goal need amending as they indicate a number of actions being in place by 2015.
<b>REASON FOR THE PROPOSAL</b>
The short-term goal’s time frame indicated as 2015 is not realistic and is likely not to be met if a more realistic date is not provided.

<b>COMMENT 4</b>
<b>DOCUMENT REFERENCE</b>
Section 4 – Purpose, Vision and Principles of the national ECD Policy 4.6 National ECD Principles - Point 9. Pg no. 54; Para. 5
<b>PROPOSAL</b>
The EC ECD Forum supports the approach towards “Appreciative promotion of existing resources and knowledge.”
<b>REASON FOR THE PROPOSAL</b>
As there are numerous good, local ECD practices in place within the Eastern Cape, we strongly support the promotion of existing resources and knowledge to strengthen the overall national ECD system.

<b>COMMENT 5</b>
<b>DOCUMENT REFERENCE</b>
Section 5 – Policy strategy and implementation 5.2 – 2 (h) Pg no. 57; Para. 11 <u>AND</u> 5.4.3 point 6 Pg no. 69; Para. 8
<b>PROPOSAL</b>
While the intention to introduce a “universally available pre-Grade R programme for children aged 4-5 years” is a positive approach, recent research conducted by the DBE indicated that the impact of Grade R is negligible and that much work is needed to strengthen the pre-school system, particularly the pre-school system attached to schools. It is therefore proposed that initially a larger proportion of ECD Community Based Centres, who meet the required standard, be engaged in the introduction of the pre Grade-R programme, in the best interests of the child.
<b>REASON FOR THE PROPOSAL</b>
The formal schooling system is not well suited to the early childhood care and education needs of young children under the age of 5. Children at that age are learning rapidly, primarily through play, and should not be placed in a formal classroom setting with desks, chairs, books and pencils such as the settings typically found in Grade 1 classrooms. Recent research has clearly found that where Grade R is placed in schools, an expectation arises for the Grade R class to mimic the methodologies of the Grade 1 class – where this is in fact bad practice and counter developmental for young children. The introduction of the pre-grade R programme needs to be treated with great thought and care and the setting that is best for children’s development must be considered. There are numerous registered ECD Centres with good ECD programmes that are in close proximity to children’s homes – providing they are at the correct standard, these settings should be considered as a first option for the introduction of pre-grade R as they are more likely to serve the best interests of children. Where primary schools are based close to where children live and they have the necessary space and human resources then the placement of pre-Grade R in schools, who meet the required criteria, becomes an option. In this case extensive school leadership support would be needed to ensure that principals and HODs understand and support the pre Grade R aspect of development –

research has flagged this as a particular area of concern. In all cases, wherever the pre-Grade R programme is implemented, training, monitoring as well as on-site guidance and support will be needed to implement the pre-grade R programme successfully. In addition should pre-Grade R be mainstreamed into the formal schooling system, at the expense of the community based ECD Centres, there is a high risk of qualified and experienced ECD practitioners migrating to the formal schooling system to take up vacant posts, as was the case with the introduction of Grade R into the schooling system. Establishing pre-Grade R within community based ECD sites would strengthen these centres and offer much needed recognition to ECD practitioners, already responsible for the care and education of 4 and 5 year olds, by introducing funded posts and a funded programme.

#### COMMENT 6

##### DOCUMENT REFERENCE

Section 5 – Policy strategy and implementation  
5.4.3  
Pg no. 71; Para. 5 and 6

##### PROPOSAL

The Draft Policy document states that “the NCF is very long and difficult for teachers .... to translate into sequenced, age appropriate, daily curriculum activities” and proposes the design of a “developmentally appropriate curriculum.” The ECD Forum notes that there is a significant gap in providing ECD practitioners with a practical step by step curriculum for use on a daily basis within various ECD settings, which neither the new NCF nor current qualifications training meet, therefore the design of a practical curriculum is essential to enhance outcomes for children.

##### REASON FOR THE PROPOSAL

ECD practitioners do not currently have a practical guide to support them in their day to day activities within various ECD settings which provides a clear basis for the application of the NCF. This creates a great deal of inconsistency in ECD programmes and children’s learning outcomes are adversely affected. While a few ECD practitioners may have alternate sources to a practical curriculum, the majority of practitioners would benefit from a practical, developmentally appropriate curriculum which they could apply daily within their ECD setting on a daily basis. This would go a long way towards raising standards within ECD programmes.

#### COMMENT 7

##### DOCUMENT REFERENCE

Section 5 – Policy strategy and implementation; 5.6 “Prioritise vulnerable children to ensure equitable access”; Pg no. 76

##### PROPOSAL

The EC ECD Forum strongly supports the prioritisation of vulnerable children in the provision of ECD services.

##### REASON FOR THE PROPOSAL

As two thirds of the children in the Eastern Cape are considered ‘vulnerable’ due to their socio-economic circumstances, the prioritisation of ECD services to these children must take precedence over services to other children in the province who, while they also have a right to access ECD services, are not considered ‘vulnerable’. Vulnerability biasness in implementation is critical to ensuring that services reach those children who most urgently need them. In the long term all children must have access to ECD services however children in dire circumstances must be prioritised in the short and medium term.

<b>COMMENT 8</b>
<b>DOCUMENT REFERENCE</b>
Section 5 – Policy strategy and implementation 5.6.2 “A dual government-regulated model of public and private delivery of ECD programmes and services.” Pg no. 80
<b>PROPOSAL</b>
The EC ECD Forum acknowledges the enormous historical and current contribution of non government and private organisations within the ECD sector and proposes that appropriate recognition is given to the tireless efforts of these organisations in taking ECD services to the children of the province. The positive spirit in which government and non government organisations currently engage needs to be retained and built upon within the province to ensure that the roll out of essential services to vulnerable children is achievable in the medium term.
<b>REASON FOR THE PROPOSAL</b>
The non government and private sector are largely responsible for the current provision of ECD services to young children in the Eastern Cape as well as the training and support of ECD practitioners. While it is government’s responsibility to provide ECD services to all children, acknowledgement of the work of current implementing organisations and the forging of ongoing, meaningful partnerships between government and non government organisations is pivotal in ensuring the successful roll out and scale up of ECD services .

<b>COMMENT 9</b>
<b>DOCUMENT REFERENCE</b>
Section 6 – Responsible role players 6.1.2 “Departmental responsibilities” Pg no. 83; para. 6; pg no. 85; para. 3
<b>PROPOSAL</b>
Both DSD and DBE will be responsible for the pre Grade R programme where it is implemented in community based ECD centres and the potential for confusion relating to the roles and responsibilities exists here. It is proposed that the assignment of responsibilities is clearly mapped out pertaining to pre Grade R to avoid duplication of monitoring and support.
<b>REASON FOR THE PROPOSAL</b>
All partners including government departments need to clearly understand their roles and responsibility so as to avoid duplication of effort within a context of limited resources.

<b>COMMENT 10</b>
<b>DOCUMENT REFERENCE</b>
Section 6 – Responsible role players 6.2 “The role of non government organisations” Pg no. 89; Para. No. 2
<b>PROPOSAL</b>
While the ECD Forum supports partnerships between GRSA and non government organisations with clear roles, responsibilities and accountability embedded within these partnerships, we would caution against creating an unnecessary administrative and compliance burden on non government organisations where they are the recipients of government funding and / or partnerships.
<b>REASON FOR THE PROPOSAL</b>
Within the current partnership framework non government organisations who are recipients of government funding have a high administrative burden which detracts significantly from their core work which is caring for and educating young children. A streamlining of administrative and reporting systems would go a long way towards ensuring that ECD partners are accountable within partnerships yet retain a core focus on services to children.

<b>COMMENT 11</b>
<b>DOCUMENT REFERENCE</b>
Section 7 – Leadership and coordination of the National ECD system 7.1 “Objectives of ECD management and coordination” Pg no. 92. Para. 7.
<b>PROPOSAL</b>
The EC ECD Forum supports the establishment, by 2015, of “a non-sectoral National ECD Agency structure which will be responsible for coordination, monitoring and oversight of the multi-sectoral comprehensive national programme for ECD” in addition to the strengthening of key government departments. The EC ECD Forum further supports the establishment of a provincial ECD Agency as set out in the Eastern Cape Provincial Development Plan.
<b>REASON FOR THE PROPOSAL</b>
For the ECD policy and programme to be implemented within the required timeframes, strong leadership and coordination will be required particularly as the role of GRSA is massively increased through the proposed ECD policy. A strong coordinating agency with a clear mandate will go a long way towards accelerating the implementation of the ECD programme and ensuring that children’s rights to ECD are realised.

<b>COMMENT 12</b>
<b>DOCUMENT REFERENCE</b>
Section 8 – ECD Funding 8.1 “Objectives of ECD Funding” Pg no. 104. Para. 8.
<b>PROPOSAL</b>
The EC ECD Forum strongly supports the proposed national ECD funding policy, the purpose of which is to “secure and distribute funds to ensure universal availability of, and equitable access to, the EP of quality ECD services, especially for low-income families that cannot afford user fees” and will “ensure that poorer children are not excluded because of the cost of services.”
<b>REASON FOR THE PROPOSAL</b>
Poorer children are currently excluded from accessing ECD services as their families cannot fund consistent access to a range of services required to ensure that children develop to their optimum potential. A dramatic increase in ECD funding will facilitate greater access particularly for children from disadvantaged socio-economic circumstances.

<b>COMMENT 13</b>
<b>DOCUMENT REFERENCE</b>
Section 8 – ECD Funding 8.2 “The funding model” Pg no. 105. Para. 5.
<b>PROPOSAL</b>
The EC ECD Forum strongly supports the proposed introduction of post provisioning to cover the costs of “staff responsible for implementing ECD programmes” as ECD services can only be offered in a consistent and meaningful way where ECD posts with salaries attached to them are entrenched within the sector.
<b>REASON FOR THE PROPOSAL</b>
There is currently no post provisioning for ECD programme salaries and the ECD workforce is weakened as a result of this. The ECD workforce is the backbone of services to children and serious attention is required to ensure that the workforce is strengthened. Post provisioning for those working directly with children is critical if the ECD policy is to succeed.

<b>COMMENT 14</b>
<b>DOCUMENT REFERENCE</b>
Section 10 – ECD Human Resources 10.3 “Categories of ECD workers” Pg no. 120.
<b>PROPOSAL</b>
The EC ECD Forum strongly supports the establishment and growth of various categories of ECD workers needed to implement the national ECD programme, as well as the introduction of coordinators and supervisors within DSD and DOH who will focus exclusively on ECD monitoring and support for the various cadres of ECD workers. Parity in remuneration and conditions of service, as well as qualifications, for ECD workers who interact directly with families and children will be important to ensure consistency and reliability of services, particularly as the different categories of ECD workers will be retained across various government departments.
<b>REASON FOR THE PROPOSAL</b>
A massive increase in the ECD workforce is required along with additional supervision for that workforce. To eliminate unintended competition and other negative spin offs, government departments, who will be creating posts for community based and centre based ECD workers et al, must ensure parity in post provisioning.

<b>COMMENT 15</b>
<b>DOCUMENT REFERENCE</b>
Section 10 – ECD Human Resources 10.4 Education and training Pg no. 121 para. 6
<b>PROPOSAL</b>
To train the existing and proposed new ECD workforce a massive effort will be required from all training and development partners including TVET colleges and RTO's as well as private providers. The EC ECD Forum is strongly in support of partnerships between government, non government and private training providers to ensure that training can take place at the scale and quality required.
<b>REASON FOR THE PROPOSAL</b>
A massive up scaling of training provision is required and all available training resources need to be optimised to ensure that the ECD workforce is properly capacitated to deliver quality ECD services to children.

<b>COMMENT 16</b>
<b>DOCUMENT REFERENCE</b>
Section 10 – ECD Human Resources Policy Annexure C: Proposed qualifications for ECD workers Pg no. 139
<b>PROPOSAL</b>
The categories of ECD workers and qualifications should be expanded to include pre-Grade R practitioners and their expected qualification. A further watch point is that the initial level of qualification proposed for ECD coordinators and supervisors is the same as the workers that they will be supervising.
<b>REASON FOR THE PROPOSAL</b>
Given the policy imperative for the introduction of pre Grade R, proper thought needs to be given to the appropriate qualifications required for this category of ECD worker particularly considering that many of these pre Grade R services may be attached to formal schools where the current requirement for a Grade R practitioner is Level 6. The differences in qualifications between pre Grade R and Grade R practitioners has the potential to significantly disempower the pre Grade R practitioner and her role in the school setting.

<b>COMMENT 17</b>
<b>DOCUMENT REFERENCE</b>
Policy Annexure D – Strategies to improve registration and access to funding for ECD centres and programmes Pg no. 140 – 142
<b>PROPOSAL</b>
While the EC ECD Forum strongly supports the introduction of strategies to streamline the registration and access to ECD funding we would caution against doing away with procedures which are in place to protect children. With specific reference to pg 141 row 2 where a suggested policy change is proposed in that “clearance should not be required for Board members and possibly not for women” which will do away with the current requirement to screen board members and staff against the sex offender’s register. We would in fact wish to see that screening is expanded to ensure that board members and staff of all ECD organisations as well as government officials working within the ECD sector should be screened against the Child Protection Register which is more comprehensive and specific to children than the Sexual Offences Register. The protection of children is not negotiable and should not be compromised in an effort to streamline processes. We would rather propose that the process to screen board members and staff and all other adults working in the ECD sector against the Child Protection Register and Sexual Offences Register is streamlined.
<b>REASON FOR THE PROPOSAL</b>
Children have the right to be protected and as responsible adults it is our duty to ensure that we take every measure to ensure this protection, including utilising key mechanisms within the country that were established for the express purpose of protecting children e.g. the Child Protection Register.

**END OF DOCUMENT**