

**AFFIDAVIT  
SAMSON SENIOR PRIMARY SCHOOL**

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I, the undersigned:


**WENANI NGXABANI**

do hereby state under oath as follows :

1. I have one child currently attending Samson Senior Primary School (Samson SPS) in grade 3, and four other children who have graduated from the school.
  
2. The facts set out in this affidavit are, to the best of my knowledge and belief, both true and correct. By virtue of my involvement in the school's affairs I have personal knowledge of the facts, unless otherwise stated or the contrary is apparent from the context.
  
3. This affidavit is intended to deal with the conditions of Samson SPS.

**SAMSON PRIMARY SCHOOL**

4. Samson SPS is located in Mtombe Administrative Area in Eastern Cape Province. It is approximately 25 kilometres north of Libode.
  
5. Samson SPS has 130 learners enrolled in grades R to 6. It has nine teachers and a Grade R practitioner who are all employed by the Eastern Cape

  
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Department of Education ("the DOE"). The school has been classified as a "no-fee school," meaning that school fees are not levied. This is because Samson SPS was placed in quintile one of the five quintiles, which is the poorest quintile. The DOE places schools in quintiles by using the poverty ranking system prepared by the National Treasury. Samson SPS is currently a Section 20 school, but has been approved to become a Section 21 school next year.

6. The current distribution of students learning in each classroom at Samson SPS is depicted by the table below:

<u>Grade</u>	<u>Number of Learners</u>
R	25
1	24
2	29
3	23
4	16
5	14
6	7

#### INFRASTRUCTURE AT THE SCHOOL

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7. Samson SPS was founded and built by the community in 1963. It was originally located in the village, and moved to its present site in 2007. The school consists of six mud structure classrooms, and one zinc shack which houses the Grade R learners. All these structures were also built by the community.
  8. The school is in dire need of new buildings. The school is located in a mountainous area. The site of the school is hilly and often subject to storms and poor weather conditions. Strong winds often make the tin roofs on the classrooms rattle and have caused serious damage to the buildings of the school. The classrooms are very cold in the winter and unbearably hot in the summer. The grade R classroom is particularly dire. Photographs depicting the interior and exterior of this classroom are attached as annexure "WN1". These conditions are not conducive to learning and teaching.
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9. Worse, the buildings are now structurally unsound. Each time there is a storm or bad weather, the condition of the buildings deteriorates further. As parents we worry about the safety of our children attending a school that could collapse at any time. Our children will not be safe until the school is provided with proper classroom structures.
  10. Another serious problem at the school is the condition of the toilets. In November 2010 the school was struck by a severe storm, and the roof of the toilet block was completely blown off. The principal, Ms Agnes Mbali, went to the DOE in Mthatha and reported the damage. She also submitted photographs of the

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damage to the block and requested that they be repaired. At the time of signing this affidavit, the toilets are still without a roof, and we have no indication of when they will be repaired. Photographs of the storm damaged toilet block are attached as annexure "WN2".

11. The teachers have no choice but to use the damaged toilets, even though there is no roof or shelter. There is no privacy, humanity or dignity when they have to use the open toilets. More importantly, the toilets are a health hazard. Most learners use the fields surrounding the school to relieve themselves because the toilets are unusable. Livestock often enter the toilets and make a terrible mess. The school is not securely fenced.
12. The school also lacks a reliable source of water. Previously, the school relied on ~~rain water tanks~~. However, the metal gutters of the buildings have been damaged by storms and now hang off the buildings. The water tanks no longer collect rainwater and pose a serious danger to learners and teachers. The nearest tap is approximately five kilometers away. The lack of water negatively affects the learners as they are often extremely thirsty and lose concentration easily.
13. Samson SPS also has an acute shortage of furniture for learners. The school has 40 combined desks and chairs, 34 tables and 50 chairs in total. This means that three or four students are often crowded into desks meant for two. It is difficult for the students to write in these conditions and they lose concentration easily. Although each of the classrooms has a chalkboard, these chalkboards are very

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old. They are in such poor condition as to be unusable.

14. The school also has no electricity. A number of years ago an electricity supply began to be installed, but the installation was never completed. Samson SPS has never had an electricity supply. This means that we cannot operate a photocopier to prepare for lessons, we don't have computers for students to use, and administrative tasks are made much more difficult without fax machines and computers.

15. The appalling conditions at Samson SPS mean that teacher morale is very low. It is very difficult for teachers to be motivated to teach when the infrastructure is in such bad condition. The conditions also cause teachers to get sick. However, our teachers attend school even if they are sick, because otherwise there would not be anyone to teach the learners.

16. Likewise, the learners are unhappy with the conditions of the school. The teaching staff work hard to encourage them to come to school. Although they are not happy, the learners do tolerate the conditions and continue to attend school, though many learners are leaving the school and numbers have steadily decreased. This has resulted in a high teacher-student ratio. We have no doubt that learners would return to the school if the school's infrastructure was improved.

17. Samson SPS does not feature on any of the ECDOE lists of schools identified for

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infrastructure improvements. The school is not on the "*Inappropriate Structures EC (5)*" list, the "*Partial Inappropriate Structures EC*" list, nor the "Infrastructure Project List 2011" which indicates expected expenditure on schools up until the 2013/2014 financial year. This strongly suggests that there are no plans in place to address the infrastructure crisis at the school.

18. The Principal has approached the district office of the DOE and told them about the conditions at the school. She was told to write a report about the school's condition and submit it at the DOE office. She did so, but nothing has happened since. No DOE official has ever visited the school. However, at the circuit meeting on 1 September 2011 at Libode, the inspector informed the principal that Samson SPS was on the bottom of the list and that we would receive assistance in the 2014-2015 financial year.

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19. This is far too long for our school to wait. The conditions at Samson SPS are dire. We cannot endure another four years of appalling buildings and insufficient furniture. We cannot endure another four years of staff getting sick and learners relieving themselves in the field. We cannot endure another four years without a proper water supply. We require emergency assistance immediately.

20. Further, we have no confidence that the DOE's commitments or time frames will be honoured. In 2002, the DOE set a goal to replacing all mud structure schools by 2010. In 2004, then President Thabo Mbeki announced that all mud schools would be replaced within the year. On 16 February 2007, then Eastern Cape

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Premier Nosimo Balindlela announced in her State of the Province Address that all mud structures would be replaced by the end of 2008. In its 2008/9 Annual Report the DOE recorded the elimination of mud structures by 2010 as a 'Service Standard'. Yet this process is still incomplete. Our own previous approaches to the DOE have been met with silence.

21. Now we are told that our school will be fixed by 2014-5. Given the track record of the DOE, we have no reason to believe that this timeframe will be kept.
  22. We are uncertain about what the future holds. We are very despondent about the condition of our school, and have no hope that the conditions will improve. We wait in anticipation that things will improve, but we are not certain that anything will change.
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23. Despite repeated requests to the Circuit manager that the school be given assistance to address its infrastructure problems, the school is always told that there is no money to improve conditions.

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**WENANI NGXABANI**

I hereby certify that the deponent has stated that she knows and understands the contents of this affidavit and that it is to the best of her knowledge both true and correct. This affidavit was signed and sworn to before me at Libode on this the 23 day

V.S. 

of NOVEMBER 2011. The Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

<sup>0515135-0</sup>  
*J. Ganga* Sergeant (2.C. 8A1144 LE)  
Commissioner of Oaths

INKONZO YOBUPOLISA BOM  
2011-11-23  
COMMUNITY SERVICE UNIT  
SOUTH AFRICAN POLICE SERVICE

*V.S*