

11 October 2013

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## APPENDIX TO COMMENT

### ON THE DRAFT REGULATIONS RELATING TO MINIMUM UNIFORM NORMS AND STANDARDS FOR PUBLIC SCHOOL INFRASTRUCTURE

GG 36837, GN 932 OF 2013; 12 SEPTEMBER 2013

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## 1. INTRODUCTION

*“What about now? Where are the learners going to learn?”* - Moto Singulakka, Grade 10,  
Oscar Mpetha High School, Nyanga, Western Cape

This appendix compiles and summarises comments from 285 learner submissions (some of which were put together by more than one learner) and 38 individual parent submissions in response to the Minister of Basic Education’s call for comment on the September 2013 draft minimum norms and standards for school infrastructure. The submissions were written by learners, primarily in grades 9 through 12, and parents who attended public meetings organised by Equal Education (EE) during September and October 2013 in the Eastern Cape, KwaZulu-Natal, Limpopo, Gauteng, and the Western Cape. While each submission will also be provided, this appendix serves to give voice to the common concerns expressed by learners and parents, and to analyse these concerns.

The importance of these learners’ and parents’ comments cannot be overstated. The voices of learners in particular must be carefully considered, as they are the closest to the issues at hand and have the most at stake. They spend every day in schools with inadequate infrastructure, and know and feel that they are at an educational disadvantage because of a lack of physical resources. They want to see improvements in their schools for themselves as well as for future generations of South African learners. Parents too want to see their children being educated in adequately resourced and safe learning environments and for them to have a quality education.

In their submissions, both learners and parents viewed the September 2013 draft as a step forward towards promoting better standards for educational infrastructure. In many places, the draft uses stronger and more specific language than the January 2013 draft, and offers more guidance and clarity.

However, many learners felt that, in places, the new proposed norms are still not sufficiently comprehensive or detailed. Moreover, learners were extremely concerned about the long timelines for implementation contained in the current draft, and the lack of delivery benchmarks along the way. Many learners stated that the conditions at their schools are dire, especially with respect to sanitation and classroom conditions, and must be improved upon immediately. Learners do not wish to wait a decade or longer for necessities such as electricity, water, sanitation, and adequate security, and request that these issues be prioritised. As Pamela



Mbhele, a grade 10 learner at the Maceba Secondary School in Nqutu, Kwazulu Natal said, “The draft you have sent to Equal Education is much better than the one you have sent in January but the problem is that in no. (3)(b)(1) you said that you will fix the infrastructure in 10 years time. I think that is too long because there are schools which really need the infrastructure now.”

The remainder of this appendix is organised into eight sections, each of which addresses an issue that arose in numerous learner and parent submissions. Part 2 of this appendix focuses on the timeline and implementation of the norms, and documents learners’ concerns that the timeframe is too long. Part 3 discusses educational spaces and learners’ concerns about classroom conditions and overcrowding. Part 4 focuses on sanitation, including learners’ statements that sanitation problems are dire in their schools and require immediate improvement. Part 5 discusses essential utilities such as water, electricity, and internet access, and the need to ensure that these are available. Part 6 analyses the lack of safety and security on school premises. Part 7 focuses on educational support spaces, including libraries, media centres, and science labs, which students feel are essential to their ability to learn and succeed. Finally, Part 8 addresses learners’ demand for sports fields, and their sense that their education will not be equal if they lack access to sport and recreational facilities.

## 2. TIMELINE AND IMPLEMENTATION

*“You provided us with something that can be achieved after a long period of time. In our schools we have urgent issues that can’t be able to wait 10 years before it can be achieved.” -*

Lucy, a grade 11 learner from Mathukulula Secondary School, KwaZulu-Natal.

### (a) Submissions

Many learners asked that the timeframes for implementation be reduced. One learner from the Western Cape suggested that the ten year timeframe be reduced to three or four years because “at the end of the day students are suffering, they don’t have resources.” Similarly, Mvelo Zondi, a grade 10 learner from Maceba Secondary School, felt that “learners who are learning under trees cannot wait for so long as they suffer a lot, 3 years should be the maximum time.” Parents too were not happy with the timeframes. Shiela Sam from Monwabisi Park, Khayelitsha said, “I request that the 10 year target be reduced, so that each and every year there are targets and there are improvements made in schools”.



Learners also did not feel that it was fair or reasonable that schools should be expected to wait for 17 years for libraries, laboratories, sports fields and media centres. As Tibatso, a learner from Tembisa West Secondary School explained, “In 17 years I’ll be so old, having children, and they cannot learn under such conditions.”

Learners and parents also said that only having long term (10 and 17 year) time-frames will not hold government sufficiently accountable. A learner from Sizwe Senior Secondary School said, “Procrastination is the thief of time, if the minister keeps on proposing too much time she will end up not provid[ing] any of the things she listed on the draft . . . she is supposed to provide the urgent resources to the needy schools first.” Mantoko Mojakisane, a parent from Kraaifontein in the Western Cape, requested that the Minister “set targets in between the 10 year period” as parents “want the truth as to how the education of our children and the conditions of their schools will improve.”

### **(b) Recommendations**

The norms and standards should have a shorter timeframe for priority requirements like water, electricity sanitation and fencing. In addition, clear phases and legally binding benchmarks along the way would ensure that progress is being made right from the start, thereby signaling that the government recognises the urgency of the problems and will take immediate steps to make meaningful improvements.

## **3. EDUCATIONAL SPACES**

*“[There is a] lack of proper classrooms in my school. There are few buildings [and] some look like township slums. They are not safe as they could fall anytime” - Mbali Cezula, iQonce High School, King William’s Town, Eastern Cape*

### **(a) Submissions**

The September 2013 draft provides more detailed requirements about space allocations per learner and classroom size than the January 2013 draft. However, learners continue to identify two main concerns with respect to educational spaces: first, the problem of overcrowding and second, the problem of classroom conditions.



With respect to overcrowding, the September 2013 draft provides for 40 learners per classroom. However, learners state that this number is too high, and that in classrooms of this size it is a struggle for them to concentrate and for their teachers to maintain order and teach. According to Asamkele Sofoyiyo of Bhisho High School in the Eastern Cape, “more than 30 learners make it hard to concentrate.” Shenhlahla Magumbea, a grade 11 learner at Mathukulula Secondary School in KwaZulu-Natal, says that fewer students would be better because “otherwise there is chaos in the classroom.”

With respect to classroom conditions, the September 2013 draft still does not ensure that learners will have a decent and safe learning environment. There is no guarantee, for instance, that classrooms must have intact floors and ceilings, or windows. Thubile Mishal of Mathukulula Secondary School asks that something be done about “broken window[s] in the winter [that] makes learners sick.” Similarly, Sifiso Mahlaba from Maceba Secondary says that it is not acceptable that in the warmer months the classes are “overcrowded and too hot.”

### **(b) Recommendations**

The maximum number of learners per classroom should be lowered to 30. In addition, with respect to classroom conditions, schools should not have crumbling roofs and walls, broken doors and windows. Where conditions like this do exist, and particularly where it poses an immediate danger to the physical security and health of learners, schools should be fixed or rebuilt immediately.

## **4. SANITATION**

*“It is degrading to have to use dirty toilets. Some students had infections caused by the bacteria in the toilet.” -Asamkele Sofoyiyo, Bisho High School, Eastern Cape*

### **(a) Submissions**

Learners wrote that sanitation conditions in their schools are dire and that improving these conditions must be urgently prioritised, and that unhygienic sanitation conditions often lead to learners falling ill. For example, Zamandulo Sigwili, from Bhisho High School stated, “Our toilets are so disgusting various learners get infected using the school’s toilets ...they have



feces all over the toilets seats; some have feces in walls.” Asamkele Sofoyiyo, a learner at the same school said, “The fact that we have dirty toilets affect us the most.” She explained that “we have had students (girls) who do not come to school when they have their periods because they cannot use the toilets.”

Many of the learners said that there are simply not enough toilets at their schools. A learner from Ikusosa High School in Tembisa asked, “How do you expect 550 boys to share six toilets because during break the queue is long and how can 500 boys share six toilets when there is only one break?” Ximba Siyadumisa, a grade 10 student from Maceba Secondary School, said her school has hundreds of learners and only one toilet, which makes access to the toilet impossible. Fizipho Vabaza, a learner from iQonce High School, drew attention to the maintenance problems caused by a shortage of toilets when she said that the toilets at her school are dirty because they are overloaded.

Some learners felt that the draft norms and standards provided for too few toilets. For example, learners from the Vhembe district requested a minimum of one toilet for every 30 learners. A learner from Ingqayizivele High School in Gauteng stated that the norms and standards should adopt UNICEF’s ratio of 1 toilet for every 25 female learners and 1 toilet for every 50 male learners.

### **(b) Recommendations**

Many learners consider the lack and terrible state of the toilets at their schools to be the most pressing infrastructure issue they face. The provision of clean, hygienic and adequate sanitation should be an urgent priority. Where toilets do not exist they should be immediately provided and where they are not working, they should be fixed. Moreover, the toilet ratio in the draft norms and standards should be brought in line with international norms.

## **5. UTILITIES**

*“Schools don’t have the infrastructure and this is affecting us as learners because if you don’t have the things to learn with the passing rate will decrease” - Mlangeni Sithandile, Grade 9, Ubongumenzi Secondary School, Kwa Zulu Natal*



## **A. WATER**

### **i. Learner and Parent Submissions**

The September 2013 draft provision on water is a step in the right direction, as it requires “a sufficient basic water supply which complies with all relevant laws and which is available at all times for drinking, personal hygiene, and food preparation.” But learner questions persist, especially with regard to the use of rain water harvesting and mobile tanks.

A student from the Western Cape asked, “How can schools use rain water harvesting? What if months the rain did not rain the children will not have water?” Nokumhula Mayer, a grade 12 student from the Western Cape, expressed concern that “rain water harvesting can cause sickness.” Wise Dlamini, a learner from Mathukulula Secondary School, said that it is “not good to have mobile water [tanks]. [Learners] needs taps in our school because water is important in their lives.”

### **ii. Recommendations**

Learners are concerned that schools which rely on mobile tanks and rainwater harvesting are susceptible to water shortages. The norms and standards should therefore require multiple sources of water if one of the sources will not always be reliable. This will ensure that clean water is available at all times. The norms should also stipulate or indicate how much water capacity a school should have in relation to the number of pupils and the minimum amount of water a school can ever have in store.

## **B. ELECTRICITY, INTERNET ACCESS AND CONNECTIVITY**

### **i. Submissions**

The September 2013 draft requires all schools to have “some form of electricity,” and “some form of wired or wireless connectivity for purposes of communication,” including telephone, fax, internet, and an intercom or public address system. However, learners want to be sure that, whatever form of electricity is provided, their schools have a constant and uninterrupted supply.



As Mbali Cezula, a learner from iQonce High School said, “The light of sun isn’t enough as sometimes it is dark.” Another learner from Ikusasa High School worried, “When there is no sunlight or raining, the solar power won’t function.”

## ii. Recommendations

The norms should stipulate that schools have a constant and uninterrupted supply of electricity, and that where necessary, different forms of electricity are utilized at a single school. Moreover, if schools are to use generators, measures should be taken to ensure that the noise does not interfere with learners’ ability to learn.

## 6. SAFETY AND ACCESS

*“Our school is not safe at all...”* – Learner from iQonce High School, Eastern Cape

### i Submissions

Many learners said that they feel unsafe both outside of and within the school. “Security is doomed it’s not safe as there are gangsters around,” wrote a learner from iQonce High School.

Learners reported that their schools had fences that were broken or were not tall enough to be effective. A learner from Sophumelela Secondary School in the Western Cape said, “Every school should have fences obviously but some schools have damaged fences and government do not even come to our school to look for something like that.” The learner continued, “In our school area there are gangsters and bad people like [thieves] and they can jump in our school fence and go inside and do something bad to learners inside the school.” Ace Sulo, from King High School, said that his school did not have proper fencing and “people from our community they come and sell drugs to learners.”

Many learners said that the 1.8 meter minimum height for school fences in the draft was not tall enough to keep people out. Yonela Gecelo from Thandokhulu High School in the Western Cape wrote, “it is not fair that school outbuilding and recreational facilities must be surrounded by appropriate fencing of a height of at least 1.8 meters because there are people who are able to jump that fence and get into school.”



Other learners stated that their school did not have security guards, or that the guards were ineffective. Learners from the Capricorn district in Limpopo explained, “We have experience with unqualified ‘security arrangements’ and believe that if not qualified the guard becomes more a problem than a help.” The location of certain schools seemed to exacerbate security concerns; many learners wrote that their schools were unsafe because they were located near taverns or bus terminals.

Learners also expressed fear of harm at the hands of other learners. Athi Zangqa from Bisho High School wrote that her school had no security and that “learners are carrying dangerous weapons at school.” Others submissions discussed security risks associated with toilets being located far from the school building. For example, learners from Vhembe noted that the area near the toilets has become “a place for gangsters and drugs.”

## **ii Recommendations**

The September 2013 draft represents a significant improvement over the January 2013, which was silent on the issue of security. Still, the draft may not be sufficient to address learners’ well-founded fears.

In addition to existing measures about security guards, fences, and alarms, the norms and standards should also address effective control of access to schools, so that administrators and teachers can monitor who is on school property. The draft should also make provision for extra security precautions if schools are located in proximity to areas that are especially prone to crime, such as taverns or bus terminals. The norms should also require maintenance of the security infrastructure; it is not enough to have a fence if the fence is broken. Finally, the norms should consider lighting and other measures that could improve safety.

The norms and standards should make a commitment to protecting learner safety and to addressing these concerns as an immediate priority. Learners cannot afford to wait years for proper security infrastructure such as lights or fences that are in good repair.

## **7. EDUCATIONAL SUPPORT SPACES**

*“Libraries and laboratories are an important part of our education and waiting 17 years for them is not right.”* – Learner comments from Capricorn district, Limpopo



The September 2013 draft states that learners must have a “library facility or media centre facility” and the appropriate “apparatus and consumables to make it possible to conduct experiments and scientific investigations.” The regulations represent an improvement over the January draft, which suggested that laboratories, libraries and media centres were educational support spaces that were interchangeable or nonessential. Learners responded to these provisions in a similar way to the January 2013 draft, by emphasising that all three educational support spaces—libraries, media centres, *and* science laboratories—are necessary and required to ensure comprehensive quality education.

## A. LIBRARIES AND MEDIA CENTRES

### i. Submissions

Learners expressed their frustration at not having libraries and media centres in their schools. Khanyisan Mngun, a grade 11 learner at Mgazi Secondary School, said “If you want something on the internet [you have to] use your pocket money to find information that you want.” Another learner from the Eastern Cape said, “We don’t have [a] library, if we have work to do we walk to town.” Kwethema, a grade 10 learner from Maceba Secondary School said, “We spend a lot of bucks going to nearest city or town for us to have access to a library.”

In addition to using a library or media centre for research, learners said they wanted libraries and media centres so they could have a comfortable place to do homework after school. A learner from Sophumelela Secondary School stated, “Some learners don’t have much time to study at home because of home issues so the library will help him/her do schoolwork.”

Learners expressed disappointment that the September 2013 draft norms still allow schools to choose between a library or media centre facility. Somita Pupuma, a learner in grade 11 at Sophumelela Secondary School said, “In the library part, why did you say all schools must have a library facility or a media centre facility? Why did you put the *or*? Can’t you make them both because all of us as learners are interested in different things.” Similarly, learners from Vhembe concluded, “Schools should definitely have a library AND a media centre and these should be fully stocked.”

Some students were open to the possibility of a mobile library, but only as a temporary solution. “The mobile library is excellent in the meantime but we don’t want it as a permanent thing because we believe that each and every school in SA should have a school library,” said



Asiphe, Thami, Thembi, and Tisetso, learners from Masiqhakaze Senior Secondary School. Other learners expressed concern about the community library option in the draft. Tibatso, from Tembisa West, wrote, that learners “disagree with the minister on library section because [we] don’t want a community library but [rather] want a school library.” A learner from the Western Cape said, “If the community members use the library facilities damage may take place because community members will use the facilities without care.” In addition to ensuring that libraries are fully stocked with books, a request made by Precious Grove, a grade 11 learner from Sophumelela High School, learners also want libraries to include “fully trained librarians and people to help in the media centre.”

## **ii. Recommendations**

Learners should be able to access reading material and use the internet to conduct research at school. Libraries and media centres must be available and accessible for learners to use at all schools.

## **B. SCIENCE LABORATORIES**

### **i. Submissions**

Learners’ submissions emphasise that their inability to study the practical aspects of science in laboratories is hurting their ability to comprehend the subject material, as well as their academic performance. As Ximba Siyamdumisa, a grade 10 learner from Maceba Secondary School, explained, “We need the science laboratories because it is not possible to conduct experiments and scientific investigations and could be difficult going to university and studying to be a scientist or a doctor. You have no clue how to use a microscope and check the blood test if you don’t ever use a lab for science.” Sifiso Mahlaba, a grade 10 learner at Maceba Secondary School said, “I study physical sciences as well as life sciences, [but] on our investigations or exams we lose marks as we do not have a laboratory.”

### **ii. Recommendations**

As learners have said, being able to conduct experiments is important to understanding natural and physical science. The September 2013 does not stipulate that there should be a dedicated and fully stocked laboratory for the conducting of these experiments. Learners feel



that in fact there should be such a space in their schools, in order to ensure that they have access to all of the necessary equipment and resources. The draft norms and standards should therefore set the goal of providing all schools offering science with a fully-stocked laboratory.

## 8. SPORTS

*“If we want to practice we go to Victoria Grounds and that’s not safe . . . there are no teachers.”* - Learner from the Eastern Cape

### i Submissions

Many learners expressed frustration with the flexibility in the September 2013 draft regarding sports and recreational facilities. This is particularly in relation to the fact that it does not require schools to have their own sports fields.

A learner from the Eastern Cape wrote about safety concerns associated with traveling off school premises to practice sport, stating, “If we want to practice we go to Victoria Grounds and that’s not safe, sometime we go there alone there are no teachers.” This learner noted that those who lived far away from school are saying, “Some of the learners don’t play sports because there are no fields and they live far from Victoria Grounds.”

Other learners wrote that their schools had fields but that they were in bad condition. For example, Liviwe Finca from the Eastern Cape said that “the field we use for training is in no condition for students.” Another learner from the Eastern Cape wrote “the cricket pitch was last used in 2006” and “the rugby pitch is not cared for.”

Learners also felt that the lack of sports fields was bad for morale and for building relationships between schools. Learners from the Vhembe district said that “schools should be proud to host sports events and can only do this if they have [their] own field.”

### ii Recommendations

The norms should require all schools to have a sports field and recreational facilities on their premises, which are well maintained.



## 9. CONCLUSION

*“[The] September 2013 draft shows an improvement made by the Minister therefore it is promising.”* - Grade 11 Learner, Western Cape

*“I like that every school must be equal.”* - Simphewe Mkhize, Mathukulula Secondary School, KwaZulu-Natal

*“I will be glad if my voice is heard.”* - Lucy, Grade 11, Mathukulula Secondary School, KwaZulu-Natal

The September 2013 draft represents a meaningful step forward from the January 2013 proposal, and the feedback collected from learners reflects this progress. It appears that the prior concerns voiced by learners were considered, and that attempts have been made to better address these concerns. In particular, learners recognised that the September 2013 draft better addresses their grievances with regard to the amount of space that should be allocated to each student, the maximum number of students per class, and the number of sanitation facilities that must be available per student. The revised draft also provides more detail about much needed basic utilities like electricity, water, and connectivity.

Nakuthula Maya, a grade 12 student from the Western Cape, commended the Minister for this progress: “From the first draft minister was not specific and on the new draft she was specific because she also told us how big the class should be, she also included disabilities on the new draft.”

At the same time, while the new draft is more comprehensive and detailed in places, serious concerns remain regarding the timeline and implementation, overcrowding and classroom conditions, sanitation, essential utilities, security, and educational support spaces. Learners who are forced to endure severe hardship on a daily basis, and who suffer due to the lack of suitable facilities, worry that the norms still are not specific enough and that the timeframe for implementation is simply too long to make a meaningful difference, especially on issues that are an immediate priority.

Learners who attend schools that have historically been disadvantaged feel a particular sense of urgency, as the inequalities and challenges that they confront continue to be perpetuated and reinforced by failing school infrastructure. For example, Amanda Khumalo, a grade 11



learner says, “We learners of Ekucabangzini Secondary school [are] suppose[d] to have more infrastructure because we are suffer[ing]. The other schools they beat us because we don’t have enough classrooms, we learn at the park homes that are not comfortable for us to study at . . . Please just think about us we are not same as the other schools we need some more support.”

The learners’ submissions make clear that the current state of school infrastructure remains an unacceptable hindrance to the development of our society. Learners like Mlanheni Sithandohe, from Ubongumenzi Secondary School, worry that “in this document the minister has [mentioned] many things that we don’t have but what is confusing me is that she has not started to make any movement about this problem that we are facing.” South Africa’s learners deserve access to safe, well-equipped school facilities that create a conducive and supportive learning environment. As one student from the Western Cape says, progress towards this goal “should start right away because schools . . . are collapsing.” The State is under an obligation to the people of South Africa to remedy persistent inequalities in school infrastructure, and to begin to do so immediately.

