

**12 June 2019**

**Norms and Standards for School Infrastructure: Equal Education summary of analyses of provincial school infrastructure reports**

**ANALYSIS: EASTERN CAPE DEPARTMENT OF EDUCATION 2018 NORMS AND STANDARDS PROGRESS REPORT**

The Eastern Cape Department of Education's (ECDoE) 2018 progress report reflects a carelessness in reporting publicly on progress with delivering school infrastructure. It is striking how similar the ECDoE's 2017 and 2018 progress reports are. Some sections and some figures in the report have remained exactly the same as in the previous year.

**Inaccurate data and conflicting numbers**

Accuracy of data remain a serious problem in the ECDoE's 2018 report. For instance, both the 2017 and 2018 reports note that there are 197 schools without access to water and 53 schools without any form of sanitation. However, in between the publication of these two reports, the national Department of Basic of Education (DBE) published its National Education Infrastructure Management System (NEIMS) report. The NEIMS report indicated that there were no schools without access to water in the province and 37 schools without any sanitation. The identical figures in the two progress reports not only contradict NEIMS, but also imply that literally no progress was made in the past year.

When it comes to reporting on "active projects" the 2017 and 2018 reports cite the same figures - is the ECDoE currently working on exactly the same amount of school construction projects as it was last year?

In 2018 the DBE conducted an audit of sanitation conditions across the country. It found that 1 598 schools only had plain pit latrines or other unacceptable sanitation facilities. A couple of months later, the ECDoE's 2018 progress report indicates that the figure is actually 2 158. One can only conclude that neither the ECDoE nor the DBE has a good sense of what the real infrastructure conditions are that schools in the Eastern Cape face.

**Missing data**

According to the Norms and Standards all schools made entirely or substantially out of inappropriate materials should have been eradicated by November 2016. The report provides no information on progress with replacing these schools.

**Rationalisation**

The ECDoE is currently busy with a programme of closing down and merging schools, known as rationalisation. The 2017 and 2018 reports both exclude hundreds of schools from the infrastructure backlog list on account that these schools will be rationalised. However figures for schools that will be rationalised have remained the same in both reports and no timelines are provided for when this process will be finalised. We have been told that some of these schools are provided with emergency interim infrastructure, but this information should be included in the progress report.

### **Feasibility of implementing the Norms and Standards**

The ECDoE spends a significant proportion of its report explaining that implementing the Norms and Standards by the stipulated deadlines is not feasible. It largely attributes this to budgetary constraints, noting that it will need an additional R14 billion to do so. EE recognises that budgetary constraints remain a challenge, especially after National Treasury's decision at the beginning of 2017 to cut R7 billion from education infrastructure grants. However, it is almost impossible to interrogate the ECDoE's contention as it does not provide the costs of different projects and also makes no attempt to suggest what timelines it is able or planning to meet. We know that these project lists exist and it is unclear why these are not included in the annual provincial infrastructure reports.

### **ANALYSIS: LIMPOPO DEPARTMENT OF EDUCATION 2018 NORMS AND STANDARDS PROGRESS REPORT**

The Limpopo Department of Education (LDoE) has made some progress in the delivery of school infrastructure since the 2011/12 financial year. Notable progress has been the building of 21 new schools, the provision of 2502 new classrooms and the provision of 739 schools with toilets. But when this progress is measured against the province's school infrastructure backlogs and the Norms and Standards for School Infrastructure deadlines, it becomes apparent that the LDoE has been fixing our schools at an excruciatingly slow pace.

The LDoE admits that in the past, it did not have a credible and reliable database on the condition of school infrastructure in the province. The department relied on the National Education Infrastructure Management System (NEIMS) data.

#### **Inconsistent and contradictory data**

The [2016](#) LPDoE progress reports states that the Council for Science and Industrial Research (CSIR) was contracted to conduct a conditional assessment of school infrastructure in the province, and this data was submitted to the department in the same year. The CSIR found that there were eight schools in the province without access to water, one school without access to electricity and **no schools made of inappropriate material**. However, the LPDoE's [2017](#) progress report states that the CSIR found there were, in fact 15 schools without access water, six without electricity and **801 schools built from inappropriate material**. The figures remain the same in the [2018](#) progress report. It is unclear if the CSIR assessment is conducted annually or whether these are the baselines figures from which the department is working. Another example of contradictory data relates to the number of schools with only plain pit latrines on site. The 2018 LPDoE progress report says that there are 765 schools with plain pit latrines as their only form of sanitation, while the [DBE's SAFE initiative](#) puts this number at 507.

Another obvious short-coming of the LDoE's progress report is its complete disregard for the Norms and Standards deadlines, and the lack of a clear plan on how schools that currently violate the three-year deadline will be completed. There is also a concern about whether the 2020 deadline will be met.

## **Budget information**

Both the 2017 and 2018 progress reports highlight that the LDoE allocates 20% of its total infrastructure budget – consisting of the equitable share and the Education Infrastructure Grant (EIG) – to address water and sanitation issues in schools. The department says that, if it were to allocate its total infrastructure budget, and not just 20%, towards addressing water and sanitation backlogs exclusively, these would be completed within a three year time period. However, should LPDoE continue allocating 20% of its infrastructure budget towards dealing with water and sanitation issues, it will take 10 to 12 years to complete the backlogs it has identified. This is inexcusable! The department cannot use lack of money as a reason for not comply with Norms and Standards, when it has continuously underspent its budget since 2011!

## **Missing documentation**

The last page of the 2018 progress report refers to additional documentation that is not provided, but is said to be attached to the report. It is clear that this information would be crucial for the public to get ahold of, as one of the documents refers to the “merging of schools” and the other is a “project list up to 2030”.

## **ANALYSIS: GAUTENG DEPARTMENT OF EDUCATION 2018 NORMS AND STANDARDS PROGRESS REPORT**

The Gauteng Department of Education (GDE)’s progress report and implementation plan is wholly insufficient and cannot be considered a document of substance. It provides no budget information and extremely limited information on plans to ensure that the GDE adequately addresses infrastructure challenges and meets the 2020 deadline. A clear shortcoming of the GDE report is the omission of any information related to infrastructure maintenance, particularly toilet maintenance. Poor maintenance contributes to the deterioration of school infrastructure, a challenge EE and schooling communities across Gauteng have brought to the attention of the GDE over a number of years. It is quite disconcerting that the GDE does not outline any plans to deal with infrastructure maintenance in its report. A lack of proper planning to maintain school infrastructure, often sees provincial education departments end up in a perpetual cycle of fixing schools.

## **Infrastructure backlogs**

It is alarming that the GDE still cites that there were 29 schools made entirely of asbestos in the province, in 2018. There seems to be little movement towards addressing this challenge, as this same number has been bandied about for a number of years. The province does not seem to be making much headway in this regard, and states that this backlog will only be completed in the 2022/23 financial year. There is no budget information contained in the report to relay how much has been or will be allocated to eradicate and replace in the report.

The report identifies overcrowding as an issue that is a result of a shortage of toilet facilities and classrooms. It is stated that there is a shortage of toilet facilities in 747 schools. While the report provides information on the estimated costs to address the shortage, it provides no information on

plans and timelines to address this problem. Once again, the data provided in the 2018 report, is an exact replica of the information that was included in the [2017](#) report - including the cost estimates!

The GDE also alludes to being unable to meet the next Norms and Standards deadline, by stating its intention to reduce the classroom backlog from 4103 to 2963 by 2020.

The report admits that only five out of 265 schools in need of perimeter fencing will be provided for during this MTEF period and will therefore not meet the 2020 year deadline, but provides no further information.

## **ANALYSIS: KWAZULU-NATAL DEPARTMENT OF EDUCATION 2018 NORMS AND STANDARDS PROGRESS REPORT**

The KwaZulu-Natal Department of Education's (KZNDoe) [2018 progress report](#) and implementation plan provides very limited information in terms of plans to fix school infrastructure. The quality of the progress report and implementation plan is shocking, as it seems the KZNDoe merely reused content from the 2017 report.

### **Repetition of data**

The 2018 progress report indicates that the number of schools with plain pit latrines across KZN stands at 1377 - which constitutes the same number cited in the [2017 report](#). Does this mean that there has been no progress made in eradicating plain pit latrines? The repetition of the same data from the previous year seems to be consistent across a number of provincial reports, which is mind-boggling.

### **Inability to meet the 2016 Norms and Standards deadline**

It should also be noted that the Norms and Standards law has explicitly banned the use of plain pit latrines in schools. Therefore pit latrines are not considered a form of sanitation. Contrary to the department's assertion that "...schools with 'no form' of sanitation have been addressed during the one-to three-year year implementation phase..." the fact that there are still 1377 schools using plain pit latrines, means that the KZNDoe has missed the 2016 Norms and Standards deadline.

The most recent report is not clear on whether the department was able to overcome the challenges it faced regarding the provision of electricity to some schools, as was highlighted in the 2017 report. The department previously cited dependency on Eskom as being a hindrance to the provision of electricity in schools – an argument that was [set aside](#) by the Bhisho High Court last year. However, there is absolutely no information on whether electricity has been provided to schools since then, or not.

### **Missing plans and timelines**

Finally, the document submitted by the KZNDoe cannot, by any stretch of the imagination, be considered an implementation plan. It does not outline any plans or timelines to address the province's infrastructure backlogs. The document does not articulate when plain pit latrines will be eradicated and replaced; when the 908 schools identified as being made of asbestos will be eradicated and replaced; or

whether the department will be able to meet the upcoming 2020 deadline. In addition, there is no projected budget information provided to address these backlogs.

## **ANALYSIS: WESTERN CAPE DEPARTMENT OF EDUCATION 2018 NORMS AND STANDARDS PROGRESS REPORT**

In its strategy for the elimination of public school infrastructure backlogs, the Western Cape Education Department (WCED) notes that all schools in the Western Cape have access to water and electricity, all have some form of electronic connectivity and that 40 schools made of inappropriate materials have been replaced since 2014. The province still has 79 schools built of inappropriate materials - a violation of the Norms and Standards for School Infrastructure.

### **Exclusion of schools**

The document consistently notes that schools located on private property and schools with less than 250 learners have not been included in backlog calculations. This is significant - in its 2014 Norms implementation [plan](#), the WCED stated that it has 284 schools located on private property. Instead, the WCED says it is requesting the owners of the property to ensure that schools meet the Norms and Standards. However, it is not clear what obligation there is on owners to actually do this and whether the WCED has been successful in ensuring that these upgrades to happen!

### **Implementation timelines**

The WCED's plan is one of the few plans that provides some insight into how it plans to address remaining backlogs, and gives timelines for the eradication of these backlogs. This is helpful, especially because these plans are supposed to not only report on work done, but also provide forward looking implementation plans. It is disappointing, however, that the WCED is only planning to complete replacing schools made of inappropriate materials post 2030, more than 14 years after the Norms and Standards deadline of November 2016 to replace these schools. The deadline to provide adequate classrooms to schools - November 2020 - is fast approaching, but the WCED's plan is unclear by when it plans to eradicate its backlog of 133 classrooms at 45 schools.

### **Cost of implementing the Norms and Standards**

The WCED notes that current funding is not sufficient to eradicate its backlogs and estimates that it will cost R7 billion to do so. It is unclear how much of this is in addition to its available budget. According to the WCED, the implementation of the Norms and Standards is further complicated by learner migration, which necessitates the building of new schools in addition to eradicating backlogs. EE recognises that budgetary constraints remain a challenge, especially after National Treasury's decision at the beginning of 2017 to cut R7 billion from education infrastructure grants. However, the public's ability to fully interrogate the WCED's contention is hampered by the fact that it does not provide the costs of different projects.

