



AUDITOR-GENERAL
SOUTH AFRICA

Auditing to build public confidence



Report of the Auditor-General South Africa (AGSA)

on the performance audit to assess the progress towards Sustainable Development Goal 4.5, with a focus on providing equal and equitable quality education for children with disabilities by 2030

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Foreword

As a signatory to the United Nations (UN) Sustainable Development Goals (SDGs), South Africa is expected to continuously monitor and report on the progress towards achieving the agreed upon targets and recognisable progress by 2030. To fulfil these expectations, Statistics South Africa (Stats SA) was appointed to coordinate all reporting activities for the SDGs and to engage with key departments, entities and other stakeholders responsible for the data on children with disabilities.

The UN member states recognised that supreme audit institutions (SAIs) could make valuable contributions towards achieving the SDGs, by tracking progress, monitoring implementation and identifying improvement opportunities. As South Africa is implementing mechanisms to track and monitor the attainment of SDG goals, the country is expected to demonstrate unequivocal commitment to eradicate poverty in all its forms, end discrimination and exclusion, and reduce the inequalities and vulnerabilities that leave people behind and undermine the potential of individuals and of humanity as a whole. To assess the commitment to the SDG principle of leave no one behind, the AGSA selected the SDG 4.5 target, which calls for eliminating gender disparities in education and ensuring equal access to all levels of education and vocational training for vulnerable groups, including persons with disabilities, indigenous people and children in vulnerable situations by the year 2030.

The Auditor-General of South Africa (AGSA) opted to narrow the focus of SDG 4.5 to **providing equal and equitable quality education for all children with disabilities.**

The AGSA is pleased to present a performance audit report on the country's progress towards the attainment of SDG 4.5. The report provides an opportunity to implement the #cultureshift2030 strategy and associates the AGSA as an institution with a meaningful and sustainable impact on the public sector at a scale that engenders a culture of performance, accountability, transparency and integrity. The strategy requires the AGSA to move away from merely communicating findings and recommendations to generating insights and applying influence on stakeholders to foster a shift in the public sector.

For these insights to improve equal and equitable quality education, the country must prioritise:

- An effective collaboration mechanism with key roleplayers involved in addressing the educational needs of children with disabilities. The collaboration should include the Stats SA as a data champion; the Department of Basic Education (DBE), which is mandated to provide education to enrolled learners; and the Department of Women, Youth and Persons with Disabilities (DWYPD), which is mandated to coordinate initiatives to address the needs of children with disabilities, including those not attending schools

- An information management system that provides accurate and relevant data essential for planning, resource allocation, and reporting of progress in addressing the needs of children with disabilities.

To implement these two areas, the DBE will need to revise the policy regulating the provision of inclusive education, encompassing the educational needs of children with disabilities and strengthening the monitoring and support to education districts and schools serving the needs of children with disabilities.

Executive summary

Since the adoption of the SDGs in 2015, there has been some progress in addressing the educational needs of children with disabilities in South Africa. However, more effort is required to fully achieve SDG 4.5, which aims to ensure equal and equitable quality education for all children with disabilities by 2030. In the remaining six years, additional efforts are required to meet the SDG Agenda by 2030.

The overall question for the audit was phrased as *“Has the country made progress towards the attainment of SDG 4.5, which advocates for the provision of equal and equitable quality education for children with disabilities by 2030?”*

The audit focus areas included:

- legal and policy framework
- data and information management
- collaboration and coordination
- resources allocation
- monitoring and support.

A summary of key insights emanating from the performance audit is depicted in Table 1 below and the progress reported by the DBE is explained in this section.

Table 1: The key insights emanating from the performance audit

Audit focus area	Findings	Insight
Legal and policy framework	- The DBE did not fully implement the propositions of the <i>Education White Paper 6, 2001</i>. - The Early Childhood Development (ECD) of children with disabilities propositions articulated in the <i>2016 White Paper on Disability Rights</i> were not fully implemented.	- The limited support offered by district-based support teams (DBSTs) affects the provision of quality education to learners with disabilities. - Inadequate tracking and provision of quality education to children aged between zero and four years will affect attainment of SDG 4.5 target by 2030.
Data and information management	- The DBE did not ensure that data on learners with disabilities was accurately and consistently captured in the South African School Administration Management System (SA-SAMS). - Inconsistencies were identified in how key roleplayers reported the number of children with disabilities in the country.	- Regular, consistent and accurate capturing of data of learners with disabilities enables the country to set realistic targets and indicators. - Understanding the number of children with disabilities attending school and not attending school is essential for planning and monitoring progress in achieving SDG 4.5.
Collaboration and coordination	The key roleplayers did not effectively collaborate with other key roleplayers to plan, monitor implementation and report interventions and programmes to address the educational needs of children with disabilities aged between zero to five years.	Addressing the educational needs of children with disabilities aged between zero to four years is important to identify any disabilities early in the child's life and to also afford schools the opportunity to anticipate the number of learners with disabilities and the nature of their disabilities.
Resource allocation	- Inadequate provision of transport to learners with disabilities: learners with disabilities requiring specialised transport at full-service schools were not provided with specialised transport and those who used mainstream scholar transport were not provided support to cope. - School infrastructure is not suitable to cater for the educational needs of learners with disabilities. - Inadequate number of teachers qualified in inclusive education or special needs education. - Inadequate provision of assistive devices to cater for children with disabilities.	- The key roleplayers should review resource allocation to provide access to quality education for learners with disabilities on transport, infrastructure, funding, qualified and trained teachers and assistive devices. - Improve the use of annual basic management processes to evaluate schools' capability to address the educational needs of children with disabilities, set up improvement plans, monitor the implementation of the plan quarterly and assess the achievement through annual academic performance plans.
Monitoring and support	Requests for assisting learners identified as having severe disabilities were not addressed promptly by the education districts. Education districts did not ensure that full-service schools are provided effective monitoring and support to ensure that children with disabilities receive equal and equitable quality education.	A strengthened DBST would enable a mechanism to timeously address the educational needs of learners with disabilities and be able to arrange professional support when required.

It is recommended that the provincial departments of education and all key roleplayers responsible for addressing the educational needs of children with disabilities heed the following call to action:

Catch them young: introduce measures to address educational needs for children with disabilities (< 5 years).

Leave no one behind: implement measures for addressing educational needs of children with disabilities not attending school – regular update and upkeep of data on the children with disabilities.

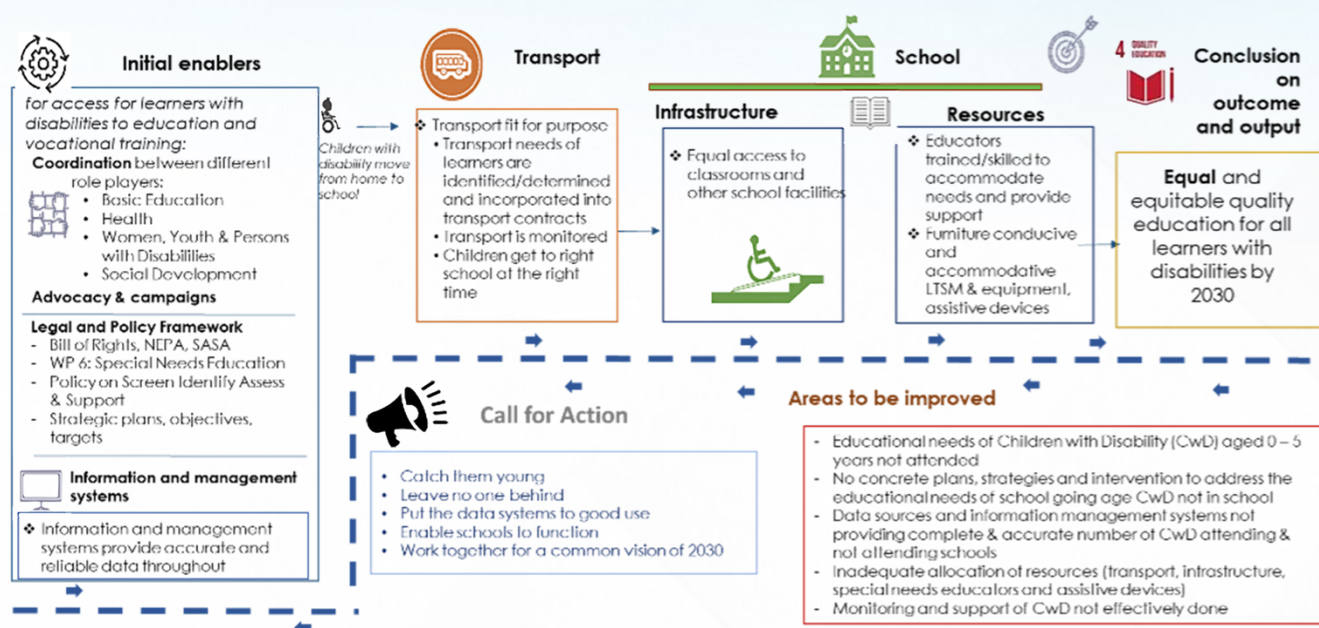
Enable schools to function: the provincial departments of education should review and develop a plan to improve resource allocation to schools servicing learners with disabilities – ensure that resources are fit for purpose for learners with disabilities.

Working together for a common vision: strengthen the inter-departmental collaboration and coordination of initiatives and implementation mechanism for addressing the educational needs of children with disabilities.

The management of key roleplayers responded positively to the call to action as captured in the management comments section.

In conclusion, the provision of equal and equitable quality education for children with disabilities is a human rights issue captured in the UN Convention on the Rights of Persons with Disabilities (UNCRPD), the UN Convention on the Rights of the Child, the UN Educational, Scientific and Cultural Organization (Unesco) 1960 Convention against Discrimination in Education and the South African Constitution. While the achievements are clearly articulated in this report, there are deficiencies identified in the value chain as reflected in Figure 1.

Figure 1: Updated AGSA value chain for addressing the needs of children with disabilities with areas for improvement



Failure to address the educational needs of children with disabilities would compromise the attainment of the SDG 4.5 target by 2030 and could also be viewed as non-compliance to international conventions and national legislation.

South Africa has developed plans and strategies to address the educational needs of children with disabilities. What is missing however, to close the identified deficiencies, is collaborative measures, a review of policy propositions, resource needs and a firm commitment to implement inclusive education policies.

Overview

South Africa has a constitution that protects the rights of persons with disabilities and the right to education for every child. The main policy propositions guiding interventions and programmes for addressing the educational needs of children with disabilities are articulated in the following legislation/White Papers:

- *The Education White Paper 6: Special Needs Education – Building an Inclusive Education and Training System* ("Education White Paper 6, 2001")
- *White Paper on the Rights of Persons with Disabilities, 2016* ("2016 White Paper on Disability Rights")
- Policies and guidelines to address the needs of children with disabilities.

Responsibilities of key roleplayers

One of the key responsibilities of the accountability ecosystem to ensure the attainment of SDG 4.5, which advocates for the provision of equal and equitable quality education for children with disabilities by 2030, is made up of roleplayers across national and provincial government and at the school level who have a part to play in enabling a culture of performance and accountability.

Figure 2: The key roleplayers in addressing the educational needs of children with disabilities



Source: Insights from the performance audit

The different roleplayers in the accountability ecosystem all have a mandate and/or responsibility – whether legislative, moral or operational – to drive, deepen and insist on public sector accountability.

The DBE is responsible for policymaking, planning, monitoring and reporting, while the provincial departments are responsible for resourcing, monitoring and supporting districts and schools, as well as reporting on the challenges and achievements experienced by the education sector. The DBE and its provincial departments are the main implementers of equal and equitable provision of equal education for children with disabilities aged zero to 18 years. The education of children with disabilities between the ages of zero to four years was previously the responsibility of the Department of Social Development (DSD); however, in his February 2019 State of the Nation Address, President Cyril Ramaphosa announced a function shift of this responsibility to the DBE. In April 2022, this function officially shifted to the DBE.

The Department of Planning, Monitoring and Evaluation (DPME) is responsible for reporting on the progress in attaining national outcomes (priorities). The National Planning Commission (NPC) is responsible for conducting and compiling SDG voluntary national review reports.

Stats SA is responsible for reporting on the progress of the attainment of the SDG. The statistician-general leads senior government leaders at the director-general level and reports on progress for the attainment of all SDGs. Stats SA relies on census data, general household surveys and data residing in the implementing departments. The DWYPD is responsible for oversight and monitoring the interventions to ensure that the needs and rights of persons with disabilities are mainstreamed across different government departments, entities and all spheres of society.

Stats SA, together with the DPME, NPC and the DWYPD, is within the Presidency portfolio. Other departments that play a role or could play a role in addressing the educational needs of children with disabilities include the Department of Health (DoH), which is responsible for the screening of learners, the Department of Home Affairs (DHA), which is responsible for the registration of children on the population register, and the Department of Transport (DoT), which is responsible for learner transport.

The South African Social Security Agency (Sassa) is also a critical stakeholder as it provides social security assistance to persons with disabilities in the form of care dependency grants and disability grants. It is, therefore, important to provide data on the number of children with disabilities benefiting from social assistance grants.

In addition to the roleplayers of the national and provincial government, education district offices play a significant role in the oversight of the functioning of schools and support of learners and teachers when learners with disabilities are admitted within the schooling system, which comprises the following types of schools:

- Mainstream schools: catering for all learners with minimal special needs education (can cope with learning using assistive devices). Access is provided to learners with mild and moderate disabilities, most physical disabilities based on the configuration of facilities.

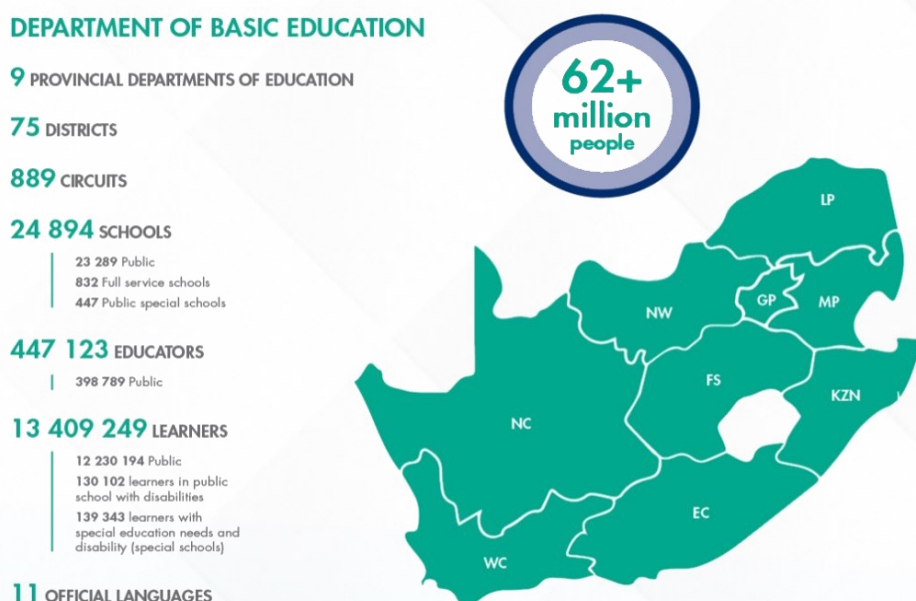
- Full-service schools: equipped and supported to provide for the full range of learning needs for children with disabilities. The different types of disabilities are addressed, and some modifications of facilities are required as the schools are expected to admit all learners, including those with mild-moderate disabilities. Assistive devices such as hearing aids and other technology devices are required to ensure that all learners have access to equal and equitable quality education.
- Special needs schools: provide educational support to address disabilities that negatively affect learning for children with disabilities. Special needs schools in their current form accommodate learners according to the severity and type of disabilities such as special schools for severe intellectual disability, hearing impairments or visual impairments learners. Since 2001, the department had an aspiration to transform special schools into special resource centres for assisting neighbouring schools captured in the *Education White Paper 6, 2001*.
- Special care centres: support children with severe to profound intellectual disability.

The size and shape of the South African basic education system

Through Goal 26 of the Action Plan to 2024: Towards the Realisation of Schooling 2030 (August 2020), the DBE plans to increase the number of schools that effectively implement the inclusive education policy and have access to centres that offer specialist services.

To achieve Goal 26, the provincial education departments are expected to plan, allocate resources, monitor implementation and report on the progress of inclusive education.

Figure 3: Landscape of the South African basic education sector



Source: Report on inclusive education from the Department of Education to the Portfolio Committee on Basic Education, 30 October 2019

As vast as it is, the South African education system is expected to respect the constitutional right of children to basic education, which includes addressing the educational needs of children with disabilities. The National Development Plan 2030 highlighted that the education system will play a greater role in building an inclusive society, providing equal opportunities and helping all South Africans to reach their full potential, in particular the previously disadvantaged and people with disabilities.

The *Education White Paper 6, 2001* appreciated that a broad range of learning needs among the learner population at any point in time and that where these are not met, learners may fail to learn effectively or be excluded from the learning system. In this regard, different learning needs arise from a range of factors, including physical, mental, sensory, neurological and developmental impairments, psychosocial disturbances, differences in intellectual ability, particular life experiences or socio-economic deprivation. Disability Info South Africa (Disa) captured the categories and types of disability succinctly, as depicted in Figure 4 below.

Figure 4: Categories of impairments adapted from the Disability Info South Africa ¹



The hearing Impairments refers to persons who have injuries, conditions or diseases that impairs a person through their hearing. Impairments covered under this category, include but are not limited to: Meniere's disease; Tinnitus (Ringing in the Ear); hearing loss and those persons who are deaf.



The visual impairments refer to persons who have injuries, conditions or diseases that impairs a person through their eyesight or vision. Impairments covered under this category, include but are not limited to: Colour Blindness; Partial Blindness and those persons who are blind.



The intellectual impairments refer to persons who have injuries, conditions or diseases that impairs person's intelligence or the way they think, interact or act. Impairments covered under this category, include but are not limited to: Down syndrome, Autism, Dyslexia, Dementia, etc.



The physical Impairments refer to persons who have injuries, conditions or diseases that impairs a person through their mobility or physical appearance. Impairments covered under this category, include but are not limited to: Albinism; Burn Victims; Absent and Reduced Limbs (Amputees); Quadriplegics and Paraplegics (Spinal Cord Injury); Stroke (Hemiplegia); Arthritis; Short Stature (Dwarfism); Muscular Dystrophy; Polio; Motor Neuron Disease; Cerebral Palsy, etc.



The speech Impairments refer to persons who have communication disabilities such as difficulties with speech, language, or the ability to understand or all three. Impairments under this category include mutism, stuttering, apraxia, dysarthria, orofacial myofunctional disorders, etc.

Source: www.disabilityinfosa.co.za

¹ Disa, unlocking the shackles of your disability using the key to knowledge' www.disabilityinfosa.co.za

Detailed audit insights

Overall audit question

Has the country made progress towards the attainment of SDG 4.5, which advocates for the provision of equal and equitable quality education for children with disabilities by 2030?

South Africa has established a clear SDG reporting mechanism, as the coordination responsibility is allocated to Stats SA. The SDG reporting in South Africa is structured into four sectors: social, economic, environment, as well as peace, justice and security, under the leadership of the statistician-general. The SDG 4.5 target is reported under the social sector, with the DBE playing a central role in providing data on the progress of providing equal and equitable quality education for children with disabilities.

What is working well?

The South African legal and policy framework articulated the right to education for children with disabilities.

While the SDGs were adopted in 2015, South Africa had already introduced a progressive legal and policy framework that set propositions to address the educational needs of children with disabilities, in terms of the country's Constitution, adopted in 1996. Notable, is that, inter alia, the National Education Policy Act 27 of 1996 (Nepa) and the South African Schools Act 84 of 1996 (SASA) prescribed the need to address learners with special educational needs. The *Education White Paper 6, 2001* outlines an inclusive education system, resource needs and collaborations required to prioritise the education of children with disabilities. The national policy on screening, identification, assessment and support (SIAS) was introduced to enable schools to address the needs of children with learning barriers.

South Africa has coordination and collaboration mechanisms for monitoring SDG alignment and implementation.

One of the achievements of the country in addressing the educational needs of children with disabilities was the establishment of the DWYPD, which focused on addressing the needs of persons with disabilities. The *2016 White Paper on Disability Rights* was introduced and included the process of addressing the educational needs of children with disabilities. This department has the potential to collaborate with the DBE in addressing the educational needs of children with disabilities.

South Africa established an SDG reporting system hosted at Stats SA expected to tap into various sources of data and information.

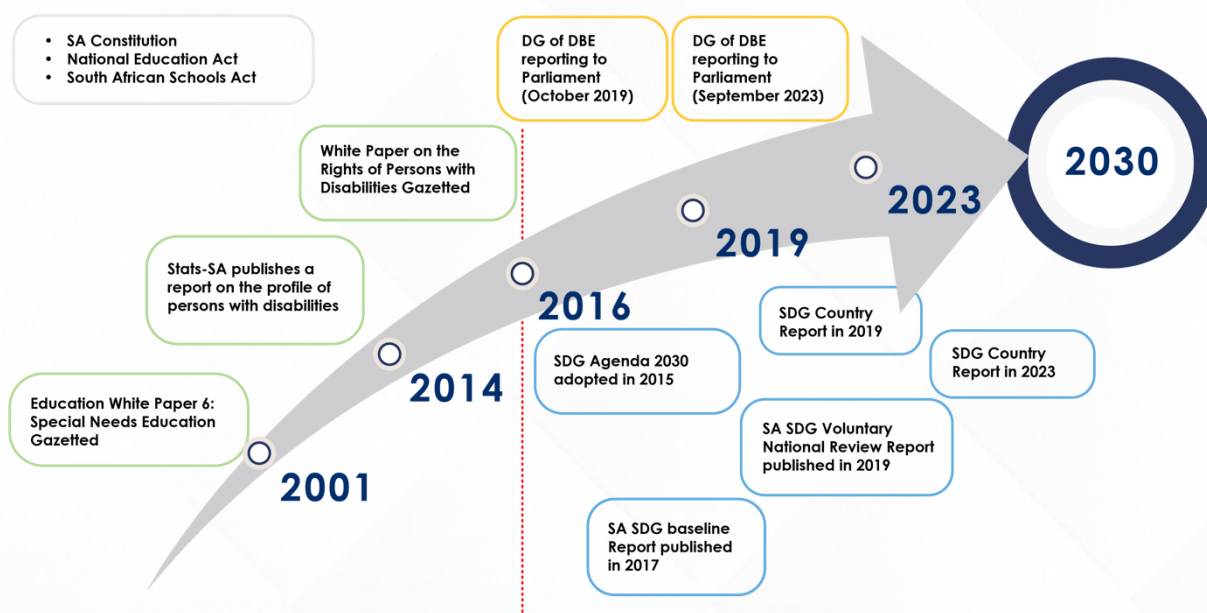
The DBE has an education management system that can capture details of children with disabilities as they are admitted to mainstream, full-service and special needs schools. Each school is supposed to have an administrator with the necessary capabilities to accurately capture this data into the school's administrative and management system. Training has been organised for administrative officers to enable the capturing of details for every learner admitted at schools, including those with disabilities.

The South African basic education sector has a differentiated schooling system to implement inclusive education and, thereby, address the educational needs of children with disabilities.

By 2023, the country had already established a substantial number of special needs schools (489) and full-service schools (832) to address the educational needs of children with disabilities. South Africa has also made progress in ensuring that there is an entity, Stats SA, designated to compiling the SDG reporting quantitative (SDG Tracker) and qualitative (SDG Country Report). The NPC conducts a voluntary national review and compiles a report thereof.

To summarise the progress made in South Africa in terms of essential policy frameworks and reporting, as well as in implementing SDG 4.5, Figure 5 shows the trajectory map.

Figure 5: Trajectory map of how South Africa has responded to addressing the education needs of children with disabilities



Source: This figure was prepared from the review of the legal and policy framework and guidelines to show the progress in achievements made in addressing the educational needs of children with disabilities

By 2016, South Africa had made gradual progress in ensuring that the educational needs of children with disabilities are integrated into the overall education system, starting from the *Education White Paper 6, 2001* and the *2016 White Paper on Disability Rights*, and continuously accounting to Parliament on the progress made. There were, however, deficiencies identified during the audit. These are discussed below.

Legal and policy framework

1. Are different roleplayers in the country implementing the legal and policy framework for the provision of equal and equitable quality education to achieve SDG 4.5 by 2030?

The legal framework governing the provision of equal and equitable quality education is premised on the South African Constitution. The DBE relies on the *Nepa* of 1996 and the *SASA* of 1996, among other legislation, for the provision of equal and equitable quality education.

In terms of the policy framework, the DBE introduced progressive policies such as the *Education White Paper 6, 2001* and the *SIAS* policy in 2014. The department also introduced special guidelines for special needs schools, full-service schools and DBSTs to implement inclusive education. The DWYPD plays an oversight role on the *2016 White Paper on Disability Rights*, which has also made propositions on addressing the educational needs of children with disabilities. We noted that some of the policy propositions were not implemented within the set timeframe, such as the *Education White Paper 6, 2001* and the *2016 White Paper on Disability Rights*.

1.1. The special needs schools were not fully transformed into resource centres as proposed in the *Education White Paper 6, 2001*.

The *Education White Paper 6, 2001* proposed strengthening special needs schools. The policy emphasises the need to strengthen special schools so they can serve as resource centres for mainstream schools, providing support and expertise. During 2023, the provincial departments of Education reported their achievement of designating special schools as resource centres to the DBE, as presented in Figure 6.

Figure 6: Designated special schools as resource centres, 2022-23



Source: Report on inclusive education from the Department of Education to the Portfolio Committee on Basic Education, 5 September 2023

The department did not fully achieve the proposition, as only the Northern Cape had designated 100% of their special needs schools as resource centres. Five of the provinces (Western Cape, KwaZulu-Natal, Limpopo, Gauteng and North West) reported less than 50% conversion, with three provinces (Mpumalanga, Free State and Eastern Cape) achieving above 50%.

As articulated in the *Education White Paper 6, 2001*, the DBE should have ensured that learners with severe disabilities are accommodated in the vastly improved special needs schools and full-service schools, as part of an inclusive education system. Given the considerable expertise and resources to be invested in special needs schools, neighbourhood schools – and especially full-service schools – should be getting support. Interventions for special needs schools were also required to be implemented in an incremental and integrated manner as part of district support services where they can become resources for all other neighbouring schools.

The observation that the requirement of special needs schools supporting full-service schools was not fully implemented, is also supported by information gathered during our site visits to full-service schools. We found that support was not always provided to some of the full-service schools that were visited by either special needs school (resource centres) staff or DBSTs. Some of the reasons provided by the education district officials and principals of full-service schools included:

- existing capacity constraints for DBSTs
- nearby special needs schools not being fully equipped to provide support to full-service schools
- education districts-based support teams not being functional, despite the available guidelines for full-service schools and special schools.

As a result, the objectives of *Education White Paper 6, 2001* proposing that resource centres should provide support to full-service schools have not been fully achieved within the set timeframe of 20 years (2001-2021) – more than two decades later.

The impact of the deficiency of not implementing the *Education White Paper 6, 2001* is that special needs, full-service and mainstream schools were not effectively addressing the educational needs of learners with disabilities, as they should. An instance where a learner dropped out of school because the resources of the school did not meet their education needs was identified in one of the 13 schools audited.

1.2. *The early childhood development of children with disabilities propositions articulated in the 2016 White Paper on Disability Rights was not fully implemented.*

According to the *2016 White Paper on Disability Rights*, inclusion at the preschool level increases social contact between children with and without disabilities and has the potential to impact the attitudes of children without disabilities towards their peers with disabilities. The experience of being together provides the opportunity to learn important life skills, including dealing with differences and recognising that in different respects they are all dependent on one another. Early identification, appropriate placement and access to intervention enhance the optimal development of learners with disabilities to ensure that this is implemented in the country.

From engagements with officials from the DWYPD, DSD and DBE, it was found that the propositions of the *2016 White Paper on Disability Rights* were not fully implemented as the following targets, inter alia, have not been achieved to date, despite the requirement to achieve them during the 2015-2019 period:

- Baselines for access were established and a tracking system for children with disabilities aged zero to 18 years was developed.
- All children with disabilities aged zero to 18 years captured, assessed and issued with individual developmental programmes.

This has, therefore, compromised targets set during 2020-2030 such as improving access and participation across the ECD phase of learners with disabilities by 50%.

Some of the reasons indicated for the non-achievement of the set targets include:

- limited collaboration among the key roleplayers for addressing ECD for children with disabilities
- the function shift of ECD from the DSD to the DBE in April 2022
- the DBE had placed more emphasis on improving grades RR and R (five and six-year-olds) while plans for children aged zero to four years were at a conceptualisation stage because, before April 2022, the DBE did not have the mandate to address the educational needs of children aged zero to four years.

Data and information management

2. Is the information management and reporting of data by different roleplayers, including national and provincial education departments, enabling effective reporting on the attainment of SDG 4.5?

Stats SA and the DPME are responsible for reporting on the progress of implementing SDGs in South Africa. Reporting on the educational needs of children with disabilities is supported using data from the DBE's information systems to complement other sources of data, such as general household surveys and regular population censuses.

2.1 The DBE did not ensure that data on learners with disabilities is accurately and consistently captured in the South African school administration and management system.

During the overall analysis of information on the total number of learners with disabilities attending schools, we found that 172 113 learners with disabilities are captured on the system. However, in a presentation made to Parliament in September 2023 by the DBE director-general, it was stated that there were 260 804 learners with disabilities within the basic education schooling system.

The DBE reported continuously on the progress of inclusive education, to the Portfolio Committee on Basic Education. Differences were also noted between what was reported and what was captured on the system. The total number of enrolled learners with disabilities for the country, as reported by the DBE in September 2023, was also compared to the data per the Education Management Information System (EMIS). Differences were noted for each province.

Table 2: Comparison of data from EMIS and accountability report

Province	Data from Accountability Report* 5 September 2023	Data from EMIS 23 November 2023	Discrepancies
Eastern Cape	29 550	23 118	6 432
Free State	31 151	18 346	12 805
Gauteng	99 350	47 931	51 419
KwaZulu-Natal	37 792	40 271	-2 479
Limpopo	10 533	10 761	-228
Mpumalanga	11 975	10 748	1 227
Northern Cape	3 231	3 346	-115
North West	10 421	9 494	927
Western Cape	26 801	8 098	18 703
National	260 804	172 113	88 691

*Source: Report on inclusive education from the Department of Education to the Portfolio Committee on Basic Education, 5 September 2023. The number was recalculated by the auditors. Data from the EMIS provided by the DBE

Inconsistencies were also identified between the numbers of learners with disabilities on the available information systems and data collected from schools.

For example:

- The schools selected for audit used the SA-SAMS to capture learners' profiles. However, the system was not fully used, as not all the schools had captured the disabilities of learners or their intellectual barriers.

The actual number of learners with disabilities enrolled at selected schools was compared to data captured on EMIS.

Table 3: Actual number of learners with disabilities enrolled at selected schools, compared to the number of learners with disabilities captured on EMIS

Province	Actual number of learners with disabilities enrolled at selected schools	Number of learners with disabilities for the selected schools, captured on EMIS
Eastern Cape	110	125
Gauteng	215	35
KwaZulu-Natal	1 499	1 353

Source: Data collected from 13 schools across three provinces and data from the EMIS for the same selection, provided by the DBE

The impact of inaccurate capturing of data onto the system by schools has had adverse effects on the completeness and credibility of reports for children with disabilities in the schooling system. The inaccurate data captured on the information management systems also adversely affects the planning and provision of resources to address the educational needs of children with disabilities.

2.2 Inconsistencies were identified in how key roleplayers reported the number of children with disabilities in the country.

Inconsistencies in the reported data on the number of children with disabilities not attending schools were identified during the audit. Table 4 below depicts the inconsistencies identified.

Table 4: Inconsistencies identified in the reported data on the number of children with disabilities

Role player	Report	Data source	Date	No. of children with disabilities
DBE	Report to Parliament	EMIS data 2022	September 2023	260 804 – In school
DBE	UNCRPD	Not stated for DBE	24 November 2015	340 613 – In school 820 649 – All children with disabilities
Stats SA	Profile of persons with disabilities in SA 2014 (based on Census 2011)	Census 2011	2014	718 409 – All children with disabilities
Stats SA	SDG reports 2019 and 2023	General household surveys	2019 & 2023	Reported in %
Sassa	2022-23 Annual Performance Plan	Not stated	2023	152 631 – Receiving care dependency grants
Media	<i>Mail & Guardian</i>	Not stated	November 2018	600 000 – Children with disabilities not attending school

Source: Various reports as indicated

The absence of a database for housing information on the number of children with disabilities attending and not attending schools is one of the reasons for inconsistencies in the reported data.

The *2016 White Paper on Disability Rights* maintained that the centralised collection and dissemination of disability-specific data and information is an area that must be prioritised, not only by the government but also by the disability sector. Impairment or activity limitation prevalence in South Africa is currently measured through national census and household surveys, as well as sample surveys by universities and research institutions and, to a limited extent, disability organisations. However, the data collection on disability prevalence through national surveys does not provide an accurate reflection of actual incidence.

The inconsistent and inaccurate capturing of data of children with disabilities was further highlighted by a *Report on the Harmonisation and Standardisation of Disability Data and Statistics* compiled by Stats SA, the DWYPD and the World Bank in 2021. The report stated that data collection on disability prevalence through national surveys does not provide an accurate reflection of actual incidence, mainly because these surveys are often done through proxy responses, where one family member responds on behalf of the entire family.

The report made some recommendations for key roleplayers responsible for data essential for reporting on progress towards achievement of equal and equitable quality education for

children with disabilities to use a Washington Group extended set of questions. It was recommended that:

- The DBE reports based on their assessment forms should include tables showing the breakdown and experience of children based on the functional domains included in the Washington Group's child functioning module. This will not require the collection of any new data, just reporting it in a way that can be aligned with Stats SA data reports. In addition, that coding should also be included on forms not referred to district hospitals for assessment.
- The Sassa system be expanded to record types and levels of difficulties in the examined functional domains that would serve to enhance the Sassa system information pertinent to the level and type of support needs of their recipients.
- The DSD (social welfare services) use the Washington Group extended set of questions in the forms for capturing data for the UN International Children Emergency Funds functioning module. These forms can be easily mapped to the disability questions in Stats SA data. The information would help identify the demand for different types of support.
- The DHA to add disability status to birth certificates. This will not be in harmony with other disability data but would still be useful in highlighting trends in congenital conditions or regional patterns. In a similar vein, disability status should be added to death certificates.
- The DoH case files, using either data from Sassa or their own functional assessments, should clearly label the type of disability according to the functional domains delineated by the Washington Group questions: vision, hearing, mobility, cognition, communication and self-care. Persons with multiple disabilities should have all the domains affected recorded. In doing so, the distribution of their types of disabilities can be compared to the general population can be examined.
- The DPME join Stats SA and the DWYPD on the data harmonisation working group and support the agreed-upon recommendations that result from this report.

Considering the recommendations of Stats SA, together with the DWYPD and the World Bank recommendations to various stakeholders on how to better capture their data to enable effective reporting², it is important for the key roleplayers to implement recommendations discussed in the harmonisation and standardisation of data and statistics reports. This would, in turn, enable better and more effective data capturing and presentation. The DBE would then be able to capture and accurately report on data sets for children with disabilities attending schools.

² Stats SA, DWYPD, World Bank (2021) Harmonisation and Standardisation of Disability Data and Statistics in South Africa

Collaboration and coordination by key roleplayers

3. Are the key roleplayers effectively collaborating to address the needs of children with disabilities not in the formal schooling system?

3.1 The key roleplayers did not effectively collaborate to plan, monitor the implementation and report interventions and programmes to address the educational needs of children with disabilities aged between zero to five years and those not attending schools.

The collaboration of key roleplayers responsible for planning, monitoring implementation and reporting on the progress made in addressing the educational needs of children with disabilities is essential, as articulated in the *Education White Paper 6, 2001*, fostering holistic and integrated support provision through intersectoral collaboration. The *2016 White Paper on Disability Rights* also identified the need for national disability rights coordinating mechanisms, which include planning, monitoring implementation and reporting.

Stats SA leads macro-level coordination for SDG-reporting purposes, which is divided into social, economic, environment, as well as peace, justice and security sectors. In preparing the SDG Country Report, the process flow below is considered.

Figure 7: Stats SA SDG country reporting process



Apart from the collaborative structure championed by Stats SA for the SDG reporting purpose, the primary roleplayer accountable for the provision of equal and equitable quality education for children with disabilities is the DBE, together with its nine provincial departments. The responsibility needs to be accomplished in collaboration with other key roleplayers, mainly the DWYPD.

However, during engagement with key roleplayers, it was found that there has not been effective collaboration in the planning, monitoring, implementing and reporting of interventions and programmes for addressing the educational needs of children with disabilities aged zero to four years. Both the DBE and the DWYPD have mostly been focusing only on children with disabilities attending school and less on children with disabilities not attending school.

An example of a missed opportunity for effective collaboration

The DWYPD initiated research to determine how the provincial departments of education are addressing the educational needs of learners with disabilities. A steering committee was established with key roleplayers, including officials from the DBE. Phase 1, which is conducted by the Human Sciences Research Council, focusing on the implementation of the *Education White Paper 6, 2001* on special needs education and inclusive education is complete. The second phase focuses on lived experience of learners with disabilities, their parents and non-governmental organisation. The progress of the phase 2 research is currently hampered by procedural disagreement between the education departments' officials and the DWYPD officials.

This critical research would have contributed to identifying areas of improvement in implementing inclusive education and is not progressing well due to ineffective collaboration.

The impact of ineffective collaboration in planning, implementation and monitoring by key roleplayers has resulted in the neglect of the educational needs of children with disabilities aged zero to four years, inconsistencies in the reports of the number of children not attending school and, most importantly, fewer insights on the reasons why these children with disabilities are not attending school.

While the DWYPD, through its national disability rights coordinating mechanisms, is responsible for the overall coordination of programmes for persons with disabilities and interventions across different sectors, the DBE is responsible for planning, monitoring implementation and reporting on interventions and programmes for learners with disabilities. There is a critical need to determine how the two departments can work together to plan, monitor the implementation and report on the educational needs of children with disabilities not attending school.

Resource allocations

4. Have the national and provincial education departments allocated resources such as finances, infrastructure, qualified teachers and appropriate learner-teacher support materials for schools to provide equal and equitable quality education for children with disabilities?

In South Africa, the provision of equal and equitable education for learners with disabilities is the responsibility of the national and provincial departments of education. The DBE is responsible for policymaking, planning, monitoring and reporting, while the nine provincial departments of education are responsible for resourcing, monitoring and supporting education districts and schools, as well as reporting on the challenges and achievements experienced by the education sector.

The *Education White Paper 6, 2001* maintained that the high cost and high-intensive resources allocated to inclusive education schools and specialised settings should be used more efficiently and the high costs of associated hostels and transport should be eliminated.

During school visits and analysis of information received from the full-service schools selected for audit, we found that some of the schools were not adequately resourced to provide equal and equitable quality education for learners with disabilities. The deficiencies captured below demonstrate the extent of inadequate resource allocation.

4.1 Inadequate provision of transport to learners with disabilities

Learners with disabilities requiring specialised transport at full-service schools were not provided for and those who used the mainstream scholar transport were not provided with support to cope. The 2010 guidelines for full-service schools maintained that schools should avail transport to and from school for learners with disabilities, in keeping with all school-day activities. The guidelines also urged full-service schools to negotiate with education district offices to arrange accessible public or scholar transport for learners with disabilities who live within the catchment area of the school.

However, we found that 12 of the full-service schools audited did not adequately provide transport for learners with disabilities requiring specialised support. Those who were using school transport did not get additional support to access available transport.

For example:

- A full-service school in the Eastern Cape indicated that the transport available is not suitable for learners with disabilities and, as a result, learners with severe physical disabilities are not enrolled at the school.

- Another full-service school in the Eastern Cape made special arrangements with a scholar transport service provider to also accommodate the four learners with physical disabilities, as they did not stay on the specified routes. In addition, the transport provider experienced a challenge with overloading because of learners living on the agreed routes but not being listed on the agreed list for transportation, resulting in their parents forcefully making the driver also transport their children.
- Five schools indicated that parents acquired private transport at their own cost, as a transport service specifically for learners with disabilities was not available.

4.2 Inadequate school infrastructure to cater for the educational needs of learners with disabilities

The *Education White Paper 6, 2001* on inclusive education makes provision for the incremental identification of certain schools to be identified as full-service or inclusive schools. Initial steps in the development of the targeted schools include the upgrading of the physical infrastructure to make it environmentally accessible, as well as providing material resources and training teachers to manage inclusive education practice.

We identified the following deficiencies at the schools selected for auditing:

- Overcrowding at six of the full-service schools as more learners were admitted than the prescribed capacity of the school. This resulted in learners sharing desks, using broken chairs and others sitting on the floors.

Pictures 1 and 2: More than two learners sharing desks due to overcrowding



Pictures 3 and 4: Learners sitting at the teacher's table, on the floor and on broken chairs



Pictures 5 and 6: Inadequate facilities resulting in learners sitting on the floor and at the teacher's desk



- Two schools from the Eastern Cape and KwaZulu-Natal used inappropriate structures such as corrugated iron shacks as classrooms, which is not conducive to learning and teaching of learners, especially those with disabilities, and lack of ramps and railings at schools impacting the accessibility of learners with physical disabilities.

Pictures 7 and 8: Depiction of learners in an overcrowded shack classroom



Pictures 9, 10 and 11: Examples of infrastructure shortcomings



Dilapidated classroom



No ramps and rails



Dilapidated classroom

One of the root causes for dilapidated infrastructure includes abandoned and delayed infrastructure projects – an issue that has been previously reported in the general reports of the AGSA.

4.3 Inadequate number of teachers qualified in inclusive education or special needs education

The guidelines for full-service schools require that one full-time learner support teacher is trained in supporting the implementation of inclusive education and this must be provided in a ratio of one per 500 learners.

Table 5 depicts the number of teachers and officials who received training on the SIAS policy implementation as reported by the DBE to Parliament in May 2017, October 2019 and September 2023.

Table 5: Number of teachers trained in inclusive education

Training on inclusive education	Reported on 30 May 2017	Reported on 10 October 2019	Reported on 5 September 2023
Teachers	29 383	95 089	178 757
Officials	1 756	4 999	10 786

Source: Reports on inclusive education from the Department of Education to the Portfolio Committee on Basic Education, 30 May 2017, 10 October 2019 and 5 September 2023

During the site visits to full-service schools selected for audit, we found that some of the schools did not have learner support teachers.

For example:

- a full-service school in the Eastern Cape had no teacher with inclusive education or special needs education, even though it had more than 500 learners; while in some schools, we noted instances of more than 1 000 learners with only one learner support teacher.

The *Education White Paper 6, 2001* highlighted that it is essential that specialist teachers be based at the district level and be pooled to schools as and when required. However, our observations after engaging with principals and education district officials indicated that special needs schools are not able to provide support to neighbouring full-service schools, as they do not have specialist staff to serve as DBSTs.

During our site visits to KwaZulu-Natal, we also found that three of the schools visited had their own resource centres and could provide support to other neighbouring schools in addressing the needs of learners with disabilities. However, we noted that the schools did not have learner-support educators. Education district officials indicated that learner support educator posts were not allocated, since posts could only be created when vacant posts arise.

Table 6 below indicates the number of teachers per school, as well as the number of teachers who had a qualification in inclusive education or special needs education (column A in the table). In addition, the number of appointed learning support educators/teachers (LSEs) (for which the guideline included the norm of 1:500) is indicated in column B.

Table 6: Findings from schools selected for audit

	Full-service school	No. of learners enrolled	No. of learners with disabilities in school (physical, MID and SID)	No. of teachers	A		B	
					No. of teachers in the school with inclusive/special needs qualification	% of teachers trained	No. of appointed LSE (state-funded)	Ratio of LSE (should be 1:500)
1	School 1 (EC)	828	50	26	1	4%	0	0
2	School 2 (EC)	382	19	12	0	0%	0	n/a as number of learners enrolled is less than 500
3	School 3 (EC)	838	41	26	4	15%	0	0
4	School 4 (GP)	1195	143	41	5	12%	2	1:597
5	School 5 (GP)	1777	33	50	9	18%	3	1:592
6	School 6 (GP)	1292	21	33	7	21%	3	1:431
7	School 7 (GP)	1303	18	41	15	37%	2	1:651
8	School 8 (KZN)	1188	268	41	18	44%	6	1:198
9	School 9 (KZN)	1124	163	39	10	26%	9	1:124
10	School 10 (KZN)	1406	445	50	6	12%	6	1:234
11	School 11 (KZN)	1 391	273	51	49	96%	0	0
12	School 12 (KZN)	839	338	41	41	100%	0	0
13	School 13 (KZN)	1759	12	60	9	15%	0	0

Source: The table was prepared from the data collected from 13 schools across three provinces

- From the analysis in the table, six of the schools did not have remedial and/or LSEs. In four instances, the ratio of LSE to learners was below the norm of 1:500.
- Overall, an average of 31% of the number of teachers were trained with inclusive or special needs qualifications.

4.4 Inadequate provision of assistive devices to cater for children with disabilities

A DoH guideline titled “The standardisation of provision of assistive devices in South Africa” indicated that assistive devices for persons with disabilities promote a normal lifestyle, improve their quality of life and enhance the prospects of employment, education and participation. Simultaneously, it reduces the cost of care and dependency. Assistive devices are, therefore, key mechanisms by which persons with disabilities can participate as equal citizens within society.

The guidelines for full-service schools require that each school plan and budget for assistive devices and specialised equipment as part of learner-teacher support material. Schools are furthermore required to assist learners eligible for assistive devices to obtain this service through the DoH.

During visits to schools, we found instances where schools did not make provision for assistive devices to learners with disabilities. For example, a full-service school in the Eastern Cape was allocated assistive devices (laptops); however, the school experienced challenges as the programmes were no longer working because the provincial department could no longer fund them.

For example:

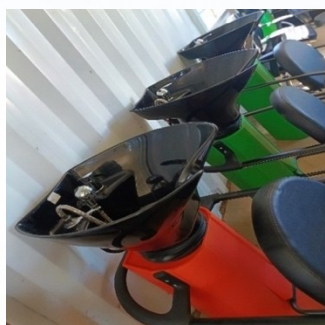
- A full-service school in the Eastern Cape had insufficient assistive devices due to budget constraints, resulting in the school reprioritising the needs. For example, the available funds were used to convert toilets that were not functional to a remedial classroom.
- At a full-service school in the Eastern Cape, the principal indicated that the school received two laptops with programmes installed for assisting learners with interventions for languages and mathematical challenges in 2017. However, the programmes had expired and were no longer working as the provincial department could no longer fund them.

Without the assistive devices to assist teachers in the remedial classes for learners with intellectual disabilities, teachers struggle to provide quality education impacting the learners’ progress.

- At a full-service school in the Eastern Cape, it was noted that the school received salon equipment and chemicals to start training learners on hair care as part of the occupational and technical curriculum stream. However, the school did not have

suitable infrastructure to set up the salon and there was no water supply to connect the water sinks. The school is not connected to electricity, which meant that they could not use the hair dryers. Furthermore, there is no trained teacher to provide occupational technical support.

Pictures 12 and 13: Salon equipment



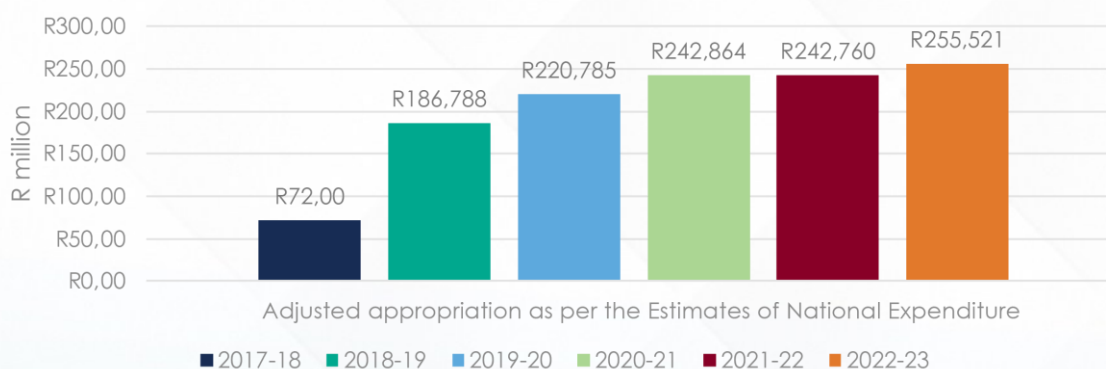
4.5 Ineffective management processes of funds allocation for addressing the educational needs of children with disabilities

In 2022-23, the DBE managed an expenditure budget allocation from National Treasury of R29,56 billion (2021-22: R27,02 billion). The department annually transfers various grants to its provincial departments and one such grant is for learners with severe to profound intellectual disabilities.

The *Education White Paper 6, 2001* proposed a conditional grant for schools to address the educational needs of learners with disabilities.

As per the 2016-17 Estimates of National Expenditure, Basic Education, a conditional grant was introduced in 2017-18 to provide access to quality publicly funded education and support for learners with severe to profound intellectual disabilities. The graph in Figure 8 indicates the increase in this grant since its introduction.

Figure 8: Vote transfers and subsidies for learners with profound intellectual disabilities grant



Source: Estimates of National Expenditure

While the budget of special schools and grants for learners with severe to profound intellectual disabilities is specific, the full-service schools' budget for learners with disabilities is not specific as it is inclusive in the equitable share each school receive.

According to a presentation by the DBE to Parliament on 5 September 2023, the budget required by provincial education departments for programme 4.1, versus the allocated budget MTEF 2023-24 to 2025-26, presented a shortfall to each provincial education department in terms of full implementation of programme 4 alone, for each year:

- 2023-24: shortfall of R22,8 billion
- 2024-25: shortfall of R21,5 billion
- 2025-26: shortfall of R21,1 billion

Full-service schools received funding similar to the mainstream schools. However, the full-service schools received an additional allocation for, inter alia, infrastructure upgrades after they were declared to be full-service schools. This provision enabled schools to modify facilities and put up rails, ramps and disability toilets for learners with disability. Additionally, the schools received an allocation budget for assistive devices for learners with disabilities.

Some of the schools selected during the audit also reported inconsistency in funding.

For example:

- In Gauteng, three of the four schools selected received an allocation of R23 000 for assistive devices in 2022.
- In KwaZulu-Natal, two schools received an additional budget of more than R200 000 that was primarily and exclusively intended for the promotion of efficient and quality education for the 2021, 2022 and 2023 financial years. The funds were allocated for the purchase of durable equipment, information and communication technology (ICT) equipment with access software and assistive devices, human resource development, as well as therapeutic, psychosocial and support intervention.
- In the Eastern Cape, one school received R142 000 in 2020 to convert toilets that were not functioning to a remedial class where they take learners with intellectual disabilities. However, nothing was received for 2021 and 2022. In 2023, it received R54 000.

The reasons for the identified resource allocation deficiencies include non-prioritisation of planning, monitoring and reporting processes by schools and ineffective guidance and support by educational districts.

The impact of inadequate resource allocation is that learners with disabilities cannot access other facilities or the teaching and learning content, and some cannot get to schools.

Monitoring and support for schools to implement inclusive education

5. Have the national, provincial and education district officials monitored and supported schools in the provision of equal and equitable quality education for children with disabilities?

5.1 *Schools experienced delays from the education districts in responding to the requests for assistance from learners with severe learning barriers.*

The responsibility of monitoring and supporting initiatives to address the needs of learners with disabilities resides with the DBE, while provincial departments and the education districts are responsible for allocating officials to fulfil these tasks. To perform this, education districts are required to have DBSTs in place for monitoring and supporting schools to address the educational needs of children with disabilities. The DBE strategic plan for 2020-24 maintains that the departmental policy obligations include the establishment of effective management, policy, planning and monitoring capacity to guide and support the development of an inclusive education and training system. This includes ensuring that learning barriers are not only perceived as residing in learners with disabilities but also various aspects of the system.

During the visits to full-service schools, it was noted that schools used the SIAS policy to fulfil their obligations of screening, identifying, assessment and support and initiating placement to the relevant school. Once the school has implemented the SIAS policy, it recommends to the education district that the child with a disability be placed at the relevant educational institution. The education district's obligation is to confirm the request for placement and move the learner.

However, it was noted by schools selected for auditing, that the delay in placing the learners surely rests with the education district, which did not always fulfil its responsibility through the DBST.

To fulfil the monitoring and support function, the *Education White Paper 6, 2001* put the DBSTs at the centre of monitoring and support responsibility by highlighting that the strengthened education support service will have, at its centre, new DBSTs that will comprise staff from provincial district, regional and head offices and special schools. The primary function of these DBSTs will be to evaluate programmes, diagnose their effectiveness and suggest modifications. Through supporting, teaching, learning and management, they will build the capacity of schools, ECD and adult basic education and training centres, colleges and higher education institutions to recognise and address severe learning barriers and to accommodate a range of learning needs.

The SIAS policy framework defines the DBST as a management structure at the district level, the responsibility of which is to coordinate and promote inclusive education through the following: training, curriculum delivery, distribution of resources, infrastructure development as well as

identification, assessment and addressing of barriers to learning. The DBST must provide leadership and general management to ensure that schools within the district are inclusive centres of learning, care and support.

Although selected schools indicated that they received support from DBSTs, monitoring and support from the district were not always without fault. Delays were noted in the placement of assessed learners to other schools due to, inter alia, resource and capacity constraints.

For example:

- A learner at a full-service school in Gauteng with a severe disability who was admitted in 2022 was only moved to a special needs school in 2023 due to the district taking a long time to finalise the necessary assessments and placement.
- Another full-service school in Gauteng indicated that a learner who was admitted to the school in 2021 with severe intellectual disability was only assisted in 2022 and 2023 while awaiting the district to assess and place the learner in a special needs school. Three learners were also awaiting assessment. Two learners were screened and not sent for medical assessment since the district did not have a psychologist allocated to the school. The circuit leader indicated that they were prioritising grade 7 learners since they were exiting primary school to high school and there were a lot of backlogs. The district representative indicated that the district did not have staff allocated to the school from 2020 and staff were only appointed in June/July 2023.

The impact of ineffective monitoring and support to schools may result in learners who need professional assistance or placement at appropriate schools not being accommodated. The impact is also highlighted by the department, which acknowledged that 27 000 learners have been incorrectly referred to special schools when they could be attending mainstream schools, captured in *Fact Sheet 6: Right to Education for Children with Disabilities*.

It is the responsibility of the principal to establish the school-based support team and ensure that the team is functional and supported. School-based/institution-level support teams should be involved centrally in identifying 'at risk' learners and addressing barriers to learning, in respect of the school system, and early identification of barriers to learning.

According to guidelines for full-service schools, principals should use a collaborative approach in creating school schedules that support inclusive practices, which includes the placement of learners within general education environments and the provision of learner support and services. The full-service schools guidelines state that principals should foster and honour, as much as possible, support to a learner at the school before sanctioning any assistance, individual assessment or placement outside the school.

Delays in such assessments and referrals often prevent learners' entry into inclusive, special needs schools. This limits their access to a full cycle of equal and equitable quality education, to which they are legally entitled. There are a substantial number of learners in full-service schools

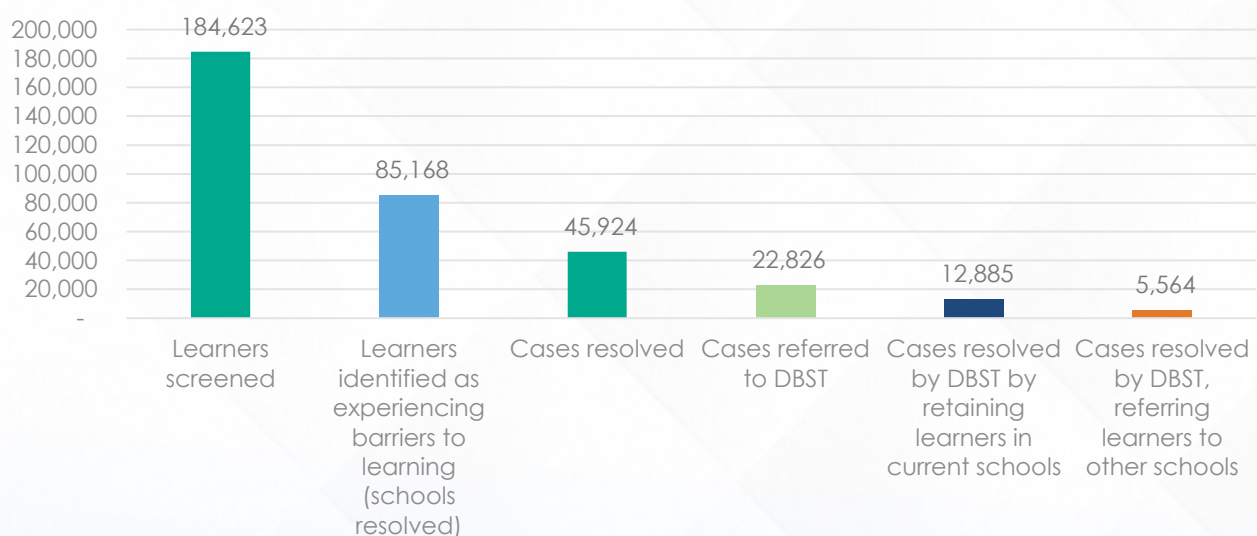
who do not support their holistic development or cognitive skills due to a lack of professional support from qualified and trained staff.

For example:

- At a full-service school in the Eastern Cape, the principal indicated that there are special schools around the Nelson Mandela education district that are not always easy to initiate placement of learners needing specialised support. When requested to assist with learners experiencing severe barriers, the education district response is for the full-service school to keep the learners until there is an available space at the special school.
- At another full-service school in the Eastern Cape, the placements to the special schools for those learners assessed to have severe intellectual impairment were not effective as the special schools around had no capacity. In 2020 and 2021, none of the learners were accepted at the special school. In 2022, 10 learners were referred; however, only three were accepted. Those who are not accepted go back home after grade 7, as the school cannot retain them any longer.

In its 2022-23 annual report, the DBE reported that its management monitored the implementation of the policy on SIAS. The focus has shifted towards the implementation of the policy on SIAS. To this end, the monitoring focused on the number of learners screened, learners identified as experiencing barriers to learning, cases successfully resolved by schools, cases referred to the DBST and cases successfully decided by the DBST by either retaining learners in their current schools or referring them into other schools. Figure 9 indicates the number of learners who were screened, and the number of cases resolved and referred.

Figure 9: Monitoring of implementation of SIAS policy – statistics on learners and cases reported for the 2022-23 financial year



Source: 2022-23 Annual Report, DBE

The reason for focusing on these areas is to ensure that SIAS becomes a mechanism for early identification and intervention.

Recommendations

A call to action

‘Catch them young’

- It is essential that the process of screening, identification, assessment and support be implemented at the early phase of learning for children aged zero to four years. This is because it helps in **identifying and addressing any barriers to learning and development** that children may face in their early years. It also **promotes early intervention, provides appropriate support, fosters collaboration and empowers children and their families**. It is important that the responsibilities assigned to the DSD, DBE and DoH are coordinated and aligned to ensure the availability of **quality ECD** services for children with disabilities.

‘Leave no one behind’

- The DBE and DWYPD should work together to improve the collaboration and coordination of interventions and programmes for addressing the educational needs of children with disabilities not attending school. The DWYPD should lead the initiatives for advocacy and mobilisation campaigns to assist children with disabilities not attending school to have access to quality education and training.
- The DBE, DWYPD and DSD should also collaborate with other key roleplayers such as civil society organisations to identify the barriers preventing children with disabilities from accessing the schooling system. These barriers, which include physical barriers and communication, must be mitigated using existing propositions.

‘Develop multiple learning pathways’

- To address the educational needs of children with disabilities who have not attended foundation phase education, **multiple learning pathways** must be developed to allow children with disabilities who have not attended schools to have access to education; at most, these will be children aged 10 years and older. This is to ensure that these children receive the necessary education and support to help them achieve their full potential.

‘Share essential data’

- The key roleplayers must improve processes and systems for collecting reliable data on access to education for children with disabilities, as this enables planning and budgeting of interventions such as building infrastructure facilities, providing qualified inclusive education teachers, etc.

'Enable schools to function'

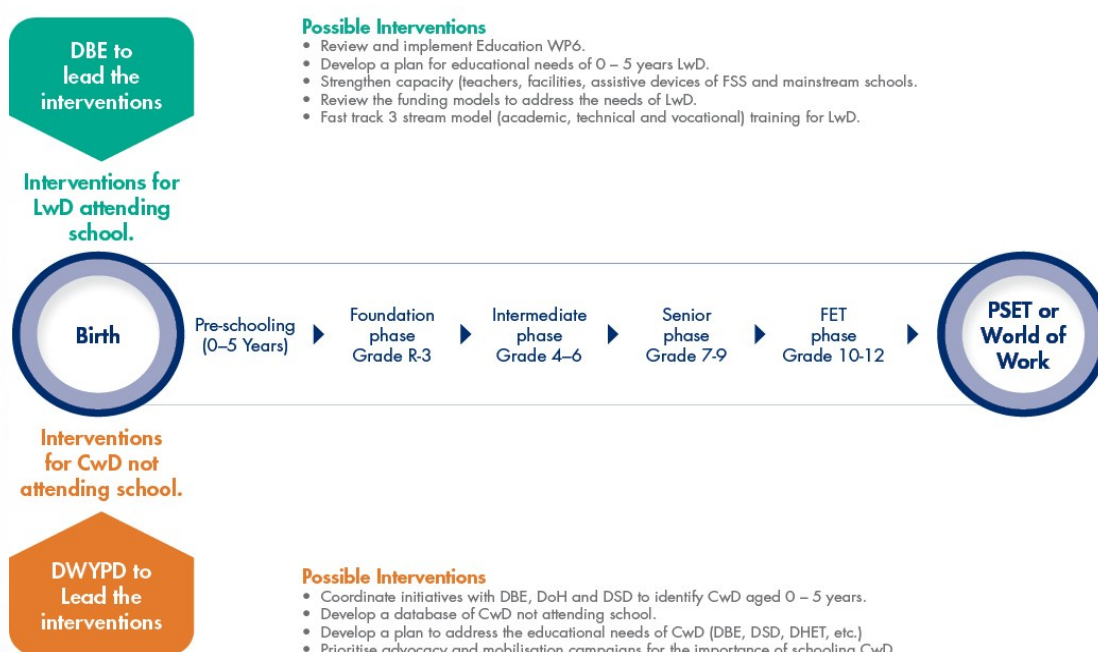
- The DBE and provincial departments should review and develop a plan to improve resource allocation to schools servicing learners with disabilities.
- Given competing priorities and financial constraints, the provincial departments of education should quantify the assistance required in terms of the modification of school facilities, learner transport, assistive devices and training of ECD practitioners and inclusive education teachers. This will enable funding regimes (private sector, philanthropists, international development agencies, government departments and entities) to notice inclusive education as a national priority.

'Work together for a common vision'

- The key roleplayers responsible for addressing the educational needs of children with disabilities should strengthen the collaborative measures to enable effective coordination, implementation and reporting of the attainment of the SDG 4.5 target by 2030.
- The DBE should encourage the establishment of provincial, district and school-specific collaborative teams to share information on the interventions for children with disabilities and develop collaborative plans and strategies to address impediments to the provision of equal and equitable quality education to children with disabilities.

Figure 10 depicts a value proposition for children with disabilities within the schooling system and those who are not attending school.

Figure 10: The value proposition for addressing the educational needs of children with disabilities



Source: Insights from the performance audit

Management response from the key roleplayers

Management response from the Department of Basic Education

The DBE welcomed the report of the performance audit on the implementation of SDG 4.5 and highlighted the following:

- The SDGs were adopted in 2015 and must be achieved by 2030; the policy proposals of *Education White Paper 6, 2001* were meant to be achieved by 2021. This means that there are still more than five years to implement the SDG 4.5 provision of quality education to learners with disabilities.
- Regarding the review of policy proposals, the minister established the ministerial task team on the review of the *Education White Paper 6, 2001* on 5 January 2023. The team has already produced a draft report on this review. The review has already reached an advanced stage and should be finalised by the end of the current financial year.
- The *Education White Paper 6, 2001* states that some of the policy proposals (e.g., integrated support provisioning) will be implemented through intersectoral collaboration modalities [e.g., with the DoH, the Department of Public Works and Infrastructure (DPWI), the DSD and the DoT]. Even though the DBE is not formally coordinating the collaboration with all roleplayers identified in the report, the department has collaborated with:
 - The DWYPD in providing progress on access to education for learners with disabilities as per the matrix for the *2016 White Paper on Disability Rights*.
 - The Independent Communications Authority of South Africa and the Department of Communications and Digital Technologies in implementing the provision of ICT and assistive devices to special schools as indicated in the DBE's annual reports.
 - The Department of Justice and Constitutional Development (DoJ&CD) and the DSD in monitoring the provision of educational programmes to children in conflict with the law and those in need of protection as indicated in the DBE's reports.
- Regarding the inadequate number of teachers trained in specialised needs education, the DBE collaborated with the British Council to train in-service teachers and develop the initial teacher education curriculum.
- The ineffective support of and overcrowding in schools can be attributed to the shrinking of the fiscus and National Treasury's instruction to reprioritise, leaving the DBE with very little leverage.
- The director-general notes the issues with the data inaccuracy. In remedying the situation, the DBE has started working towards ensuring that the data on learners with disabilities is accurately and consistently captured in the SA-SAMS.
- Responding to the SDG 4.5 report requires a multidisciplinary approach that involves other line functions within the DBE and other sister departments, which include the DPWI, the DoH and the DoT, over and above the ones identified in the report. There is a need to consider the multidisciplinary requirements for responsibilities regarding SDG 4.5.

Response from the Department of Women, Youth and Persons with Disabilities

- The department experienced challenges with the project aimed at evaluating how the educational needs of learners with disabilities are being addressed by schools and districts and what the lived experiences of parents and non-governmental organisations are.
- The DWYPD director-general indicated that she has noted the issues raised by the AGSA regarding children with disabilities who are not at schools, the need to collaborate with other departments responsible for addressing the needs of children with disabilities, including those not mentioned, such as health, transport and infrastructure, and the need for coordination of advocacy and database of the children with disabilities.
- The director-general also indicated that an opportunity to meet with the heads of other key roleplayers involved in addressing the needs of children with disabilities is needed urgently.
- The DWYPD recommends that the DoH and DHA ensure that they contribute to the ECD value chains that feed into the DBE system. The DoH and DSD should ensure that the programme of the first 1 000 days of a child integrates children with disabilities. Stats SA needs to include children with disabilities aged between zero to four years in all future censuses and surveys.
- The determination of the admission process should be through an assessment of the severity of disability through the national policy on screening, identification assessment and support.
- Children with disabilities must be included in the compulsory attendance of the school-going age group from seven to 14 as ascribed in the voluntary national review report.
- The DBE and DPWI should develop regulations that determine that all resources allocated to special schools be informed by the needs of the school as identified by the resource needs audit.
- In conclusion, to effectively domesticate the UNCRPD, there is a need to finalise the review of the *Education White Paper 6, 2001* with an action plan so that SDG 4.5 can be realised by 2030. The DBE should conclude the process for the review of *Education White Paper 6, 2001* by the end of the 2024-25 financial year and widely consult with the sector. The DWYPD needs to form part of the ministerial task team to review the *Education White Paper 6, 2001*.

Response from Statistics South Africa

The Stats SA officials acknowledged that the institution did not report data for children with disabilities aged zero to four years because it uses questions recommended by the Washington Group on disability statistics for use across countries, in both censuses and surveys, on measuring disability status of populations aged five years and above. This is a short set of functional questions/domains, namely, seeing, hearing, communicating, walking or climbing stairs, remembering or concentrating, as well as self-care. A person is considered to have a disability as and when he/she is reported to have some difficulty in at least two of the domains. In addition, he/she must have reported to be having “a lot of difficulty” or “cannot do at all” in any of the six domains.

The computation of disability status using these questions provides good disability estimates as they are based on the World Health Organization's (WHO) International Classification of Functioning, Disability and Health as the conceptual framework focusing on the component of activity limitations. Stats SA, therefore, collects information based on the Washington's Group set of questions and, as such, will not be able to report on children zero to four years old in the SDG country report.

Eastern Cape Department of Education management's comments

- The Eastern Cape provincial department indicated that the number of learners in the department's database are learners who have undergone the assessment process and confirmed that they can attend school. Those who have never attended or never registered in the schools would not be in the database. The number continues to fluctuate due to the schools that do not pursue a National Senior Certificate, as placements happen throughout the year and some are placed on skills training.
- The province depends on the DoT to provide transport for learners to and from schools. The department officials indicated that they have requested a bus that can accommodate learners using wheelchairs. It was strongly emphasised that the challenge of transporting learners lies with the DoT. Principals at full-service schools will be instructed to ensure that all contracted learner transport serves learners with special educational needs.
- The province has ringfenced one post for every school that has 500 or more learners and provided one post as per the norm from the national guidelines. The officials will make follow ups with the infrastructure of the school where building project stoppage was identified. Full-service schools that are not using this additional post will be instructed to comply. A memorandum was sent to schools at the start of the 2024 academic year, instructing principals to regularly update the qualifications of educators.

Gauteng Department of Education management's comments

- The Gauteng Department of Education (GDE) analysed the cost of improving old schools' infrastructure with maintenance included and estimated that these would cost billions. The fiscus is a key determiner of how far the department can go in accommodating all the education needs.
- In terms of ECD and accommodation of children with disabilities aged zero to five, the department is working towards developing and actioning a strategy for supporting ECD centres that are outside the its influence.
- The data inherited from the DSD is incomplete and the team is cleaning up to better understand the landscape from an education perspective.
- The GDE has taken a firm position that all public schools transact on SA-SAMS.
- Fast-tracking the three-stream model will also assist learners with disability as they move from grade 7 to start occupational or vocational training instead of just being forced to join an academic stream.

- The GDE Directorate for Inclusive and Special Schools (ISS) activity participates in an inter-departmental platform led by the Office of the Premier: Gender, Youth, Disabilities, Children and the Aged and the Gauteng Disability Rights Alliance. The GDE Directorate for ISS also actively participates in the platform led by the DoJ&CD regarding schools at child and youth care centres and secure care centres.
- In Gauteng, full-service schools received additional funding in 2024 to procure specialist learning and teaching support material and to deal with accessibility matters, specifically ramps and rails.
- Gauteng's DoT working committee on learner transport for disabled learners has been provided with relevant information and will be working on an action plan.

KwaZulu-Natal Department of Education management's comments

- The KwaZulu-Natal provincial department noted that there have been deficiencies in terms of the implementation of the *Education White Paper 6, 2001* and noted what had been achieved or completed. While the department has achieved 31% of transforming the special needs schools into resource centres as noted in the AGSA report, the provincial department is also exploring locating these resource centres within full-service schools where there is a strong need.
- It is acknowledged that more needs to be done to improve the livelihood of learners with disabilities. For instance, on access, the department is doing well. On transport, there are about 60 buses that will be coming into operation next year (2024) which are suited for learners with special needs. The process of prioritising what we need to do and what can be done within the financial constraints the department is facing should be something that the report considers.
- The KwaZulu-Natal provincial department's management indicated that there are several interventions to mitigate certain factors that are raised in the report. One example would be that of the exit age of learners with disabilities. The head of department has already given a policy instruction that learners with disabilities may be delayed from exiting at the age of 18 until 21 years to cater for the delays that these learners encounter before starting school and during their progression.

Audit methodology and approach

Background

This performance audit was conducted in accordance with section 188(4) of the Constitution, read in conjunction with sections 5(1)(aA) and 5(3) of the Public Audit Act 25 of 2004.

The auditing of government institutions is based on the premise that the accounting officer is responsible for instituting measures to ensure that resources are procured economically and used efficiently and effectively.

The primary objective of performance auditing is to confirm independently that these measures do exist and are effective. A structured reporting process is used to provide management, Parliament and other legislative bodies with information on shortcomings in the implemented management measures and examples of their effects and suggestions for improvement, where applicable.

The function of the AGSA is not to question policy but rather to audit the effect of policy and the management measures that lead to policy decisions.

Audit approach

Performance audits are conducted according to ISSAI 3000, *Standard for Performance Auditing* and the AGSA Performance Audit Manual 2023³, which contains the standards and methodology for planning, executing, reporting and following up performance audits in the public sector. Because the environment to be audited is so complex, each performance audit focuses on a specific section of the activities of a particular institution, with the focus being on the more important areas.

The department's management was given detailed information about the objectives of the audit and the audit questions to be addressed during the audit. In addition to regular interactions, arrangements were made to establish a steering committee consisting of the audit team and senior departmental staff. The purpose of the steering committee is to ensure the creation of a structured communication line and the cooperation of all the relevant parties. During steering committee meetings, an agreement was sought on matters such as audit criteria, findings and conclusions. Issues were deliberated and the departmental representatives were afforded the opportunity to submit inputs to the final management report. This approach

³ IDI's SDG Audit Model

should lead to the prompt implementation of corrective steps where weaknesses have been noticed.

It is, however, in no way the intention or practice of the steering committee to provide the institution with a veto on the nature and scope of the performance audit or the resultant report. A steering committee is a consultative consensus-seeking forum, but the relevant statutory powers remain vested in the AGSA.

Consensus about the factual correctness of the findings contained in the report was reached during a meeting held with the auditee(s) management on 7 December 2023, 7 July 2024, 9 July 2024, 22 July 2024 and 26 July 2024.

Audit objective

The audit objective was to assess the progress made by the South African government in attaining SDG 4.5, which advocates for the provision of equal and equitable quality education for children with disabilities by 2030.

The motivation for selecting the audit topic emanated from the premise that all countries have a primary responsibility to review, at national, regional and global levels, how they are making progress in attaining SDG targets over 15 years. The UN member states recognised that auditors-general could make valuable contributions to the SDGs by tracking progress, monitoring implementation and identifying improvement opportunities. To this end, the International Organization of Supreme Audit Institutions (Intosai) committed to, and called upon, members of SAIs to "Contribute to the follow-up and review of the SDGs' progress within the context of each nation's specific sustainable development efforts and SAIs' individual mandates".⁴

Following the SDG principle of "leave no one behind", the Afrosai-E, as part of ongoing efforts to empower members to support their governments in achieving the SDGs, invited members to participate in coordinated audits on the country's progress towards providing equal and equitable education for children with disabilities in line with SDG 4.5 target.

The overall audit question of the performance audit was:

Has the country made progress towards the attainment of SDG 4.5, which advocates for the provision of equal and equitable quality education for children with disabilities by 2030?

⁴ IDI's SDG Audit Model

Audit scope

The audit examined the efforts and progress made by the DBE and provincial education departments in providing equal, equitable and inclusive formal education for vulnerable children, in line with SDG target 4.5. The audit included the following areas:

- legal and policy framework
- data and information management
- collaboration and coordination
- resources allocation
- monitoring and support.

During the audit, an analysis of data was done on 13 schools across KwaZulu-Natal (six), Gauteng (four) and the Eastern Cape (three), with detailed testing focusing on the 2019-20 to 2022-23 financial years.

In addition, the audit assessed the effectiveness of collaboration and coordination by key roleplayers in addressing the educational needs of children with disabilities, including Stats SA, the DWYPD, DPME, Sassa and the NPC.

Audit methodology

As required by the performance audit manual, sufficient audit evidence was obtained for the findings and illustrative examples contained in this report. These examples have been included to illustrate the consequences and effects of deficient management measures and are not collectively a full reflection of the extent of audit work conducted at entities.

The following are some of the methods applied to collect data and obtain evidence for the audit:

- document reviews
- interviews with different roleplayers
- analysis, inspection and comparison of information
- school visits and observations.

It is important to acknowledge that reliance was placed on data from nine provincial education departments submitted by the DBE, the audit of the 13 schools and publicly available information, such as Stats SA reports, as well as other planning documents from government departments and entities. Data or information was not always available for the audit team to evaluate. In these instances, best available information was used to illustrate the problem and not as supportive evidence to the findings. The data or information was, therefore, also not used in the audit conclusions.

Data from the sources below were analysed. This is not an exhaustive list but indicates the important sources used. The limitations of the data are also included in more detail in the different sections of the report:

- accountability reports to Parliament⁵
- annual reports, annual performance plans, strategic plans, policies and legislation
- White Papers
- reports by different roleplayers
- 13 full-service schools
- EMIS⁶, captured in the SA-SAMS.



⁵ The accuracy of the data used in the reports was not validated during the audit and is presented as is.

⁶ The system was not audited. It was also incomplete as it was not always updated. However, the information extracted from the system was the best available information and is used in the report to illustrate the problem or principle.

Audit criteria

We developed criteria that correspond with the audit objective(s) and audit questions. The criteria were discussed and agreed with the auditee on 4 October 2023.

Table 7: SDG 4.5 performance audit criteria

Audit criteria	Sources
1. The country should have legislation and policies for protecting the rights of persons with disabilities. 2. The country should have implementation strategies to achieve SDG 4.5.	• The UN Convention on the Rights of the Child • SDG resolutions • <i>Education White Paper 6, 2001</i>
3. To enable reporting, the lead institution should be able to access data of different roleplayers responsible for addressing the needs of persons with disabilities. 4. The information should be complete, reliable and relevant to monitor the information about the SGD. 5. The country should have a coordination mechanism outlining the roles and responsibilities of specific roleplayers. 6. Continuous interaction of key stakeholders responsible for addressing the needs of persons with disabilities to eliminate duplications and counter-productive interventions.	• The UN Convention on the Rights of the Child • SDG target 17.18 • <i>Education White Paper 6, 2001</i>
7. The country should have processes, systems and capabilities to identify persons with disabilities. 8. Create public awareness through advocacy and mobilisation campaigns for the identification. 9. The admission requirements for children with disabilities should be simple and encouraging.	• SDG target 17.16 • <i>Education White Paper 6, 2001</i> • Policy on Screening, Identification, Assessment and Support
10. The national and provincial education departments should allocate resources to enable equal and equitable quality education for children with disabilities. 11. The allocated resources are optimally used to enable equal and equitable quality education for children with disabilities.	• <i>Education White Paper 6, 2001</i> • Policy on the Provision of an Enabling School Physical Teaching and Learning Environment (2010) • Guidelines for Full-Service Schools and Special Schools • Action Plan to 2024: Towards Realisation of Schooling 2030 – Goal 21
12. The national and provincial education departments, education districts and circuits should monitor and support schools in providing equal and equitable quality education for children with disabilities.	• <i>Education White Paper 6, 2001</i> • SDG target 17.19

Acronyms and abbreviations

AGSA	Auditor-General of South Africa
Afrosai-E	African Organization of English-speaking Supreme Audit Institutions
DBE	Department of Basic Education
DBST	district-based support team
DHA	Department of Home Affairs
Disa	Disability Info South Africa
DoH	Department of Health
DoJ&CD	Department of Justice and Constitutional Development
DoT	Department of Transport
DPME	Department of Planning, Monitoring and Evaluation
DPWI	Department of Public Works and Infrastructure
DSD	Department of Social Development
DWYPD	Department of Women, Youth and People with Disabilities
ECD	Early Childhood Development
EMIS	Education Management Information Systems
ICT	information and communication technology
LSE	learning support educators/teachers
MID	mild/moderate intellectual disability
Nepa	National Education Policy Act 27 of 1996
NPC	National Planning Commission
SASA	South African Schools Act 84 of 1996
SA-SAMS	South African School Administrative and Management Systems
Sassa	South African Social Security Agency
SDG	Sustainable Development Goal
SIAS	Screening, Identification, Assessment and Support
SAI	supreme audit institution
SID	severe intellectual disability
Stats SA	Statistics South Africa
UN	United Nations
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
WHO	World Health Organization



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