**Presentation to Parliament on the Children Act Amendment Bill**

**Introduction**

**IKAMVA LABANTU’S ECD REGISTRATION HELPDESK**

Since 2013, Ikamva Labantu has been operating South Africa’s first ECD Registration Helpdesk operated by informed staff who guide and supports ECD principals to apply for registration with the Department of Social Development in order to obtain Early Learning Subsidies. Currently support over 400 township preschools in Khayelitsha are being supported through Ikamva Labantu’s Registration Helpdesk, impacting on 18 000 children attending these ECD facilities. Ikamva Labantu provides information and practical assistance for registration which may include resources for upgrading and building plans and organizes Imbizos to inform and encourage more preschools to strive for registration. To date we have upgraded over 100 ECD centres across the Cape Metro.

Ikamva Labantu submission was inspired by a broader campaign calling for Real Reform for the ECD sector supported, as at the date of this submission, by over 100 Principals from Khayelitsha as we strongly believe in doing things with the people and not for the people. Ikamva Labantu concurs with Real Reform for ECD that the legislative amendments that have been proposed by the Children’s Amendment Bill are a missed opportunity to improve the lives of millions of children.

It is a human rights that all South African children have access to quality ECD. For all South Africans to live with dignity and realize their human potential, and for South Africa to reach its human capital requirements for a thriving economy, it is essential that learning and nurturing in the critical window period of development - birth to seven - are optimised. During this period, essential neurological pathways are being created for language, thinking, social and emotional development. Subsequent to this period, it is very difficult to remediate these missed developmental opportunities, leaving children with a precarious future and raising the risk of intergenerational hardship.

According to UNICEF, “early years of childhood form the basis of intelligence, personality, social behavior, and capacity to learn and nurture oneself as an adult[[1]](#footnote-1)”. Further, a good foundation in the preschool years has a positive effect through adulthood. Educated and healthy people participate in, and contribute to, the financial and social wealth of their societies. On the contrary, children are not able to achieve their full potential if they do not receive adequate nutrition, care and opportunities to learn.

In South Africa there is inequality in the opportunities afforded to preschool children which results a vicious circle of poverty in the disadvantaged communities. The majority of children in South Africa do not have access to quality early childhood development services. Currently, 46.3% of preschool children receive no ECD at all. Only 11.6% of children attend registered ECDs, a massive 42% of children attend unregistered ECDs and only 9% of the children are obtaining subsidized learning. The preschool children receiving the least ECD support come from the poorest families and are most vulnerable to health, social and economic risks and shocks.

**Section 103C of the Bill** talks about the norms and standards for early childhood development centres

1. **In Ikamva Labantu’s experience managing its ECD Registration Helpdesk, the following problems hinder the registration of community preschools:**

**-**Norms and Standards for obtaining registration are extremely onerous and unattainable for most township preschools and even more so for preschools in informal settlements, particularly the zoning, lease agreements, building plans and safety requirements.

-They were developed based on first world norms and standards, with a “one size fits all” approach. The Norms and Standards are currently unobtainable for ECD centres in townships and it is even worse for ECD centres in the informal settlements. Problems include:

i. The registration documents are not always accessible to preschool principals, being too complicated and difficult to understand, as principals often have had limited formal education. Compounding this obstacle is the high number of stakeholder forms (these change now and again without notice) necessary to complete the process (Department of Fire and Safety, Department of Environmental Health and the Department of Land Use).

ii. The lack of financial security from potential subsidies leads to high turnover of staff and overcrowding - large numbers of children are enrolled to increase the financial gain to cover expenses.

iii. Lack of funding prevents principals from upgrading their properties to be deemed safe.

iv. Having insufficient funds to fulfil the structural requirements, building plans and resources leads to educares operating illegally and unsubsidized for many years.

This all has direct negative consequences to the children’s learning opportunities in their most critical formative years. When subsidisation is not achieved, a continuous negative chain of events perpetually exists:

-overcrowding,

-high staff turnover,

-employment of staff not adequately skilled in early childhood development,

-lack of adequate stimulation for children,

-children not accessing the nutritious meals required to grow healthy minds and bodies,

All impacting their ability to learn and develop psychosocially. This list can trail along with many more negative results ending with the more current challenges of unemployment and all the violence seen and experienced by many.

Ikamva Labantu with the help of Department of Economic Development and Tourism is currently working on upgrading 10 ECD sites in Khayelitsha so that they can meet the norms and standards and achieve registration status. All 10 ECDs need approved building plans for the Department of fire to conduct assessment for safety compliance and none of them had a building plan. Principals cannot afford to have building plans drawn and also pay scrutiny and penalties fees once the plans have been submitted for approval at Building Plans Management.

Where in the Bill, is mention of ECD centres in informal settlements or informal structures? There is need for lenience in some norms and standards for these centres. **It is ironic that although the main objectives of the Children’s Act are to give effect to constitutional rights of children, the Norms and Standards have led to a situation where the rights of the children are in fact denied. There are double standards here, whereby it is deemed ok for a child to live in a shack but it is not ok to stimulate or educated in one. What is government then doing to provide better infrastructure for children in these communities?**

**Different types of ECD providers need to be recognition**

Under the guidance of skilled service providers, these non-centre-based service providers reach large numbers of under five year olds. These children would otherwise have “fallen through the cracks” and left to roam in the streets before entering formal schooling unprepared and inclined to struggle significantly.

Further, children in these programmes are granted access to holistic stimulation, inclusive of safety and identification of challenges and referral. Making this mode of early childhood more enticing and operated by skilled personnel requires funding beyond meager parent fee contributions, noting the latter is not a consistent reality for many carers.

**The Bill also only mentions the Department of Social Development (DSD) and there is no mention of the Department of Basic Education (DBE) in both managing and registration of ECD services. How is the migration accounted for in the Bill?**

**We are also in support of the 5 reforms proposed by Real Reform for ECD.**

**Thank you!!!**

Presented by Mildred Bopoto

1. [↑](#footnote-ref-1)