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At the same time, the demands and perspectives of these groups will give closer focus to stage 1. Initially, as negotiations begin, stages 1 and 2 will begin to influence existing state policies, while the negotiation process in turn will give direction to stages 1 and 2.

It is intended that NEPI concentrates on the first of these functions: policy option analysis. It will provide the data base - a range of feasible options for every sector of formal and non-formal schooling in South Africa - from which interest groups, political parties and ultimately a future democratic government can exercise educated policy choices. The choice of policy is ultimately a political matter. Research does not reveal the 'true' policies which a state should follow, but, by exploring the implications of different options, research can assist a government to make informed choices consonant with its political programme.

NEPI will draw on the experience of practitioners in investigating realistic, workable solutions for the total transformation of the education system. Each of the research groups (RGs) covering the respective areas of education will, therefore, be composed of both researchers and practitioners. In general, the work of the RGs will not include investigating the details of delivery systems, but will be confined to delineating the broader parameters of possible solutions to the problems within the respective areas. Thus, for example, one of the concerns of the RG on post-secondary education will be to explore ways of facilitating the transfer of students between technicals and universities Engineering faculties, without going into syllabus details. It may well be, however, that certain RGs will be in a position to progress to more detailed investigations.

2. A brief history of NEPI

NEPI arises out of efforts on the part of the Wits and Urban SPUs, RETRESA (URC), RESU (London), NEDU (Pretoria) and the NRCC to rationalise the work of the existing research units, establish new units in areas where such facilities do not exist, and to initiate the process of educational policy formulation from the perspective of the democratic movement. Following 5 meetings of these organisations between December 1989 and June 1990, the NEPI initiative (then known as the Education Research Programme) was approved by the National People's Education Workshop held at Wits on 1-2 July 1990.

During the 2 days following this workshop, a meeting of the research units and the NRCC established an Interim Committee to draw up an outline for NEPI. Interim reports of this committee were considered by the EDU Trust on 12 July and the NEC of the NRCC on 25-26 August. Both meetings approved the initiative, confirming the mandate of 1-2 July. The

government ministers are talking privately of a new political dispensation being implemented at the start of 1993, and the phasing in of educational policies consistent with this dispensation within the next six months. There is speculation that the ANC will be consulted on the 1991 Budget, and that the movement may form part of some kind of transitional government in the very near future. Clearly, the state is moving towards negotiation with all available to the democratic movement in every sphere of due speed. If well-defined policy positions are not available to the democratic movement in every sphere of government within the next 12 to 18 months, it will be at a gross disadvantage during the negotiation process.

In education, various interest groups have been busy preparing their negotiating positions over the past few months. Minister Louw's Renewal Strategy will be complete by the end of the year. At least three private sector initiatives are well under way, while another two are gathering information. The National Education Policy Investigation (NEPI) is an initiative aimed at exploring policy options in the sphere of education, from the perspective of the democratic movement. In addition to serving the negotiators, a parallel aim of NEPI is to inform the campaigns undertaken by NACC organisations.

A distinction can be drawn between:

- STAGE 1: the exploration of policy and options
- STAGE 2: the choice of a particular set of policy positions by a political party or interest group
- STAGE 3: the actual policies resulting from a compromise between different political parties and interest groups during negotiation.

In practice these stages do not occur in series or in isolation from one another: as the public policy debate gathers momentum, an interaction will be set up between all 3 stages. As policy options begin to be identified and interrogated during stage 1, these processes will feed into the choices made by political parties and interest groups.

THE NATIONAL EDUCATION POLICY INVESTIGATION (NEPI)

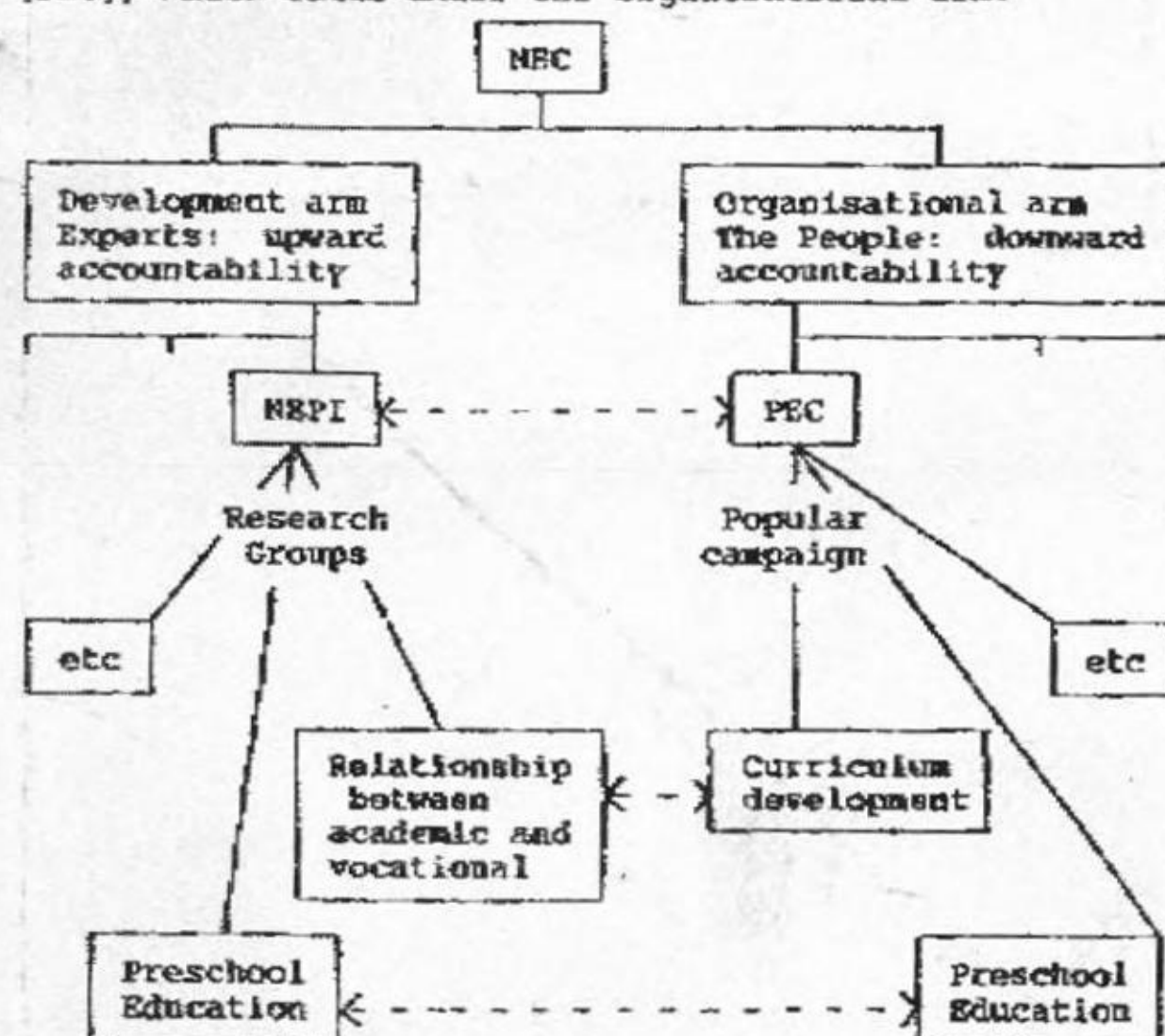
PROPOSAL

Preamble

Interim Committee presented the NEPI outline to the NECC/Research Units group on 11-12 September. The present document reflects progress made up to and including this meeting.

3. The Relationship between NEPI and the People's Education Commission

A fundamental principle of NEPI is that it will remain closely accountable to the educational ideals of the people. In order to ensure this, a working relationship needs to be established between NEPI, which falls under the Development arm of the NECC, and the People's Education Commission (PEC), which falls under the organisational arm.



This relationship will occur at two levels:

- * The executive of NEPI will work closely with the executive of PEC

A major task for the PEC over the next 16 months is to formulate an Education Charter which will embody the ideals and key demands of the people. A first step in this process will be the drawing up of a draft Charter to be presented to the NECC Congress in December. This will be followed by a year long Education Charter Campaign, during which the draft Charter will be discussed at grassroots level through all the sectors

and regions of the NECC. The final Charter will then be ratified at the annual Congress at the end of 1991.

By means of regular meetings between the two executives, NEPI and PEC will maintain a dialectical relationship: the research will be guided by and remain accountable to the ideals of the masses, while the demands of the people will be tempered by the realities of available resources, as delineated by the research.

The Education Charter Campaign was initiated at the NEC meeting in Bloemfontein on August 25-26. At this meeting the convenor of the Interim Committee of NEPI gave an input on the work of NEPI to date. It was also agreed that a relationship between the executives of the two bodies needs to be established within the next two months.

In response to a request from the PEC, the NEPI Interim Executive agreed at its meeting on 11-12 September to undertake some research in order to provide a basis for the draft charter. This task will consist of gathering information which could bear directly or indirectly on the formulation of a draft Education Charter. Material of direct relevance includes the work of the last Education Charter Campaign published in 1987, and resolutions of the various NECC conferences. Publications such as 'Goals, objectives and principles of the new education', which guided education in Nicaragua under the Sandanistas and COSATU's Women's and Workers charters, may also be useful source material in drafting the Education Charter. It was agreed that Saleem Badat (coordinator), George Mashamba, Blade Nzimande and Yogesh Marsing carry out this research and forward the fruits of their labour to the PEC by 14 October.

The Research Groups of NEPI will work closely with the Popular Campaigns of PEC

At the People's Education Workshop held in Cape Town on July 1-2, a resolution was taken to initiate campaigns (or commissions) in each of the following areas:

1. Literacy and numeracy
2. Rural work
3. Curriculum development
4. Preschool Education
5. Certification and Exams
6. Policy
7. Tertiary Education
8. In Service Training
9. Administration and Control
10. Non-formal Education

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11. Education and Work

Ideally, these campaigns will work closely with the corresponding Research Groups of NEPI. In practice, however, it is unlikely that the campaigns will be established in the near future. Nevertheless, each of the above 11 areas will be formally recognised in the Education Charter Campaign, through the articulation of a number of key ideals within each area.

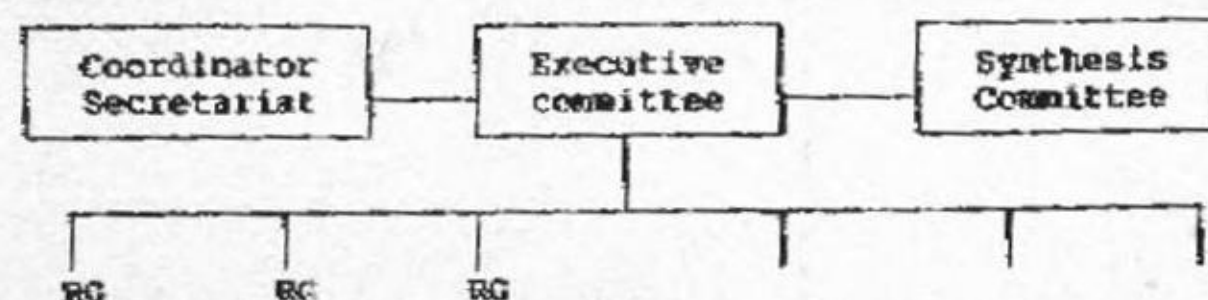
4. The Relationship between NEPI and the ANC Education Department

It would be unwise to mount more than one policy investigation exercise within the democratic movement. Firstly, it will be difficult enough to find sufficient human resources for one such exercise, let alone two. In addition, a duplication of effort will almost certainly result in unhealthy competition, confusion and demoralisation. Assuming, then, that only one policy generation exercise will be initiated within the democratic movement, a number of reasons can be advanced why this should be under the auspices of the NEPI rather than the ANC.

Naturally, a number of ANC office bearers and many members will be involved in the work of NEPI. In all such cases, however, this will be done on the basis of the expertise of these individuals rather than because of their political affiliations. The same principle will apply to people of other persuasions within the left sector of the political spectrum.

5. Structure of NEPI

The work of NEPI will be carried out by a number of Research Groups. The RGs will be coordinated by an Executive Committee, which in turn is serviced by Coordinator, a Secretariat and a Synthesis Committee.

Executive Committee

- * Consists of a Convenor, the Coordinator, the Convenors of all the RGs, the Coordinators of the EPU's, 2 representatives from the PEC, 2 representatives of the EDT, 2 NEC office bearers and coopted members.

- * Its functions are to plan and maintain overall control of NEPI, consider the reports of all RGs and to liaise with the PEC.

Coordinator

Much of the day-to-day work involved in setting up the RGs, ensuring that they function smoothly and maintaining the functions of the Executive Committee will devolve to the Coordinator.

Synthesis Committee

It is proposed that this consist of a Convenor, the EPU coordinators, together with a number of coopted members. The Synthesis Committee will read all proposals and reports produced by the RGs and advise the Executive Committee accordingly.

It is not intended that NEPI produce a closed set of coherent and fully consequent policy options. Since it is focused primarily on STAGE 1 of the policy process, the immediate task of NEPI over the next 18 months is to undertake an open ended process of policy option analysis. Nevertheless, even at this early stage, it is desirable to begin to delineate consequent threads which run through the work of the respective Research groups, and to draw these together into sets of options which exhibit at least a loose coherence. This task will be guided by the Synthesis Committee.

6. Research Groups6.1 Principles

The NEPI initiative contains two mechanisms designed to obviate the main pitfalls of technicist approaches to the policy process.

- * A Principles and Frameworks Research Group will set the political trajectory for the work of all the other RGs.
- * The work of the RGs will be driven by a set of questions. These will give explicit direction to the research within the particular areas of the education system to be covered by the respective RG.

The programme of action of each RG will include the following tasks:

- * Identifying people who will work on the RG and its sub-committees;
- * identifying areas in which sub-committees need to be set up;
- * formulating the frames of reference of the RG and its constituent sub-committees;
- * framing questions to guide the research;
- * formulating research proposals for submission to the Synthesis Committee.
- * submitting two interim reports to the Synthesis Committee during the course of 1991;
- * submitting a final report by June 1992.

6.2 Tasks

The work of each RG will include a gathering together of existing policies being applied in South Africa, in addition to alternatives proposed by the state, the private sector, the democratic movement and any other sources. Comparative studies will reveal the policies applied in other countries. Because of the dearth of education policy research in South Africa, it is most probable that each RG will need to propose novel solutions to existing problems. All these options will then be subjected to analysis: their political, social and economic implications will be examined in detail.

6.3 Personnel

Each RG will be led by at least one Convenor, although it will be preferable to appoint two people. In the larger RGs it will be necessary to set up sub-committees to deal with component parts of the work, and in such cases Convenors of each sub-committee will need to be appointed. In addition, each RG will contain anything between 5 and 20 members.

Following the mandates of the People's Education Workshop and the NEC of the NECC, the NEPI Interim Committee has been entrusted with the task of appointing convenors to the RGs and their sub-committees, and suggesting the names of other members. This task is guided by 3 principles: inclusiveness, cost effectiveness and consultation. There are also 3 criteria for appointing convenors:

- * must have recognised expertise in the area covered by the RG, and proven ability to deliver research in the area;
- * must have sympathy with the political goals of the democratic movement, but not exhibit too sectarian a profile; and
- * within the framework of the first two criteria, the appointment of the convenors must be sensitive to traditional race and gender imbalances.

It is intended that the institutions which employ the convenors of RGs and sub-committees be requested to second these people to work on NEPI, at least in a half-time capacity. Securing these secondments is an urgent priority, as institutions such as university education departments are probably well on the way to finalising their programmes and work allocations for 1991. It will be preferable to provide the host institutions with the funds needed to secure the release of NEPI personnel: this will obviate any possibility of NEPI being beholden to the host institutions, and also avoid any contestation over ownership of the products of the RGs. The same principles will apply to the utilisation of other resources, such as typing and printing facilities.

6.4 Individual Research Groups

In delineating the NEPI Research Groups, the areas identified as targets for Popular Campaigns at the People's Education Workshop on 1-2 July were used as a starting point. The RGs are listed below, together with the beginning of a frame of reference for each group.

a. Principles and Frameworks

- * This group will formulate a framework within which all other RGs will operate.
- * It will mediate between the PEC and the RGs: it will translate the ideals embodied in the Education Charter into a set of research imperatives.
- * The kind of issues which need to be addressed by this Research Group include: urban/rural imbalances, racism, sexism, authoritarianism and the violence which has become an endemic feature of the education system. It will set short-, intermediate- and long-term ideals and problematise the question of change: how to move from the present toward the transformation of education.
- * At the same time, the products of the Principles and Frameworks RG will feed into the Education Charter campaign.

b. How to construct an equitable system of universal education?

- * This can be considered as a 'macro' Research Group in that the terms of reference of all other RGs will, to some extent at least, be strongly influenced by decisions taken within this work group.
- * Its primary concerns will be the overall shape of the education system, and the determination of priorities in allocating resources to the component parts. This

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- * Consider universities, technikons, nursing colleges, teacher training colleges, and community colleges separately, as well as the relationships of these institutions to each other and to secondary schooling.
 - * Funding.
 - * Admissions criteria.
 - * Relate the curricula to skills requirements and human resources development.
- h. How can teacher training be transformed so as to produce critical and skilled teachers?
- * Include pre- and in-service training.
 - * Link to curriculum development.
- i. What is the best way of providing Preschool Education?
- * Think of cost effective ways of broadening the provision of Preschool Education.
- j. How to democratise the planning, administration and control of education?
- * Investigate the centralisation/decentralisation debate.
 - * Link with PTSA network: problematise the role of PTSAs.
 - * Consider ways of making management more efficient, accountable and participative. Look at the Bureaucracy and the role of information technology.
- k. What are the educational, social, political and economic implications of different language policies?
- * Consider issues such as 'mother tongue' instruction, levels and mechanisms for the introduction of English as a second language medium, the role of regional languages, etc.
- l. What support services are needed to ensure effective education?
- * Consider education for the physically handicapped and those with learning problems such as dyslexia.
 - * Avoid the tendency to consider the victims of apartheid as being culturally or cognitively deprived.
 - * Consider issues such as the institution of feeding schemes, broadening the provision of inoculation services and mental health programmes.

7. Budget

National Office:

salaries	30 000
office hire	9 000
equipment	30 000
telephone	1 000
stationary	5 000
printing	500 000
fax	1 000
travel: 10 plane tickets x R700 x 8 meetings	56 000

Policy Commissions:

secondment: 24 x R50 000	1 200 000
travel: 10 plane tickets x R700 x 10 meetings x 20 commissions	1 400 000
stationary and printing	30 000
telephone and fax	18 000
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8. Plan of Action

STEP 1. Proposal to be finalised by Interim Committee on 8 October, and presented to NEC on 20 October.

STEP 2. To be completed by December 1990:

- * Approach RG Convenors.
- * Raise funds.
- * Secure secondment of Convenors.
- * Convenors, in consultation with NEPI Executive, appoint other members of RGs.
- * NEPI Executive meets PEC Executive.
- * Principles and Frameworks RG commences work.

STEP 3. All other RGs commence work in January 1991. Proposals submitted to Executive by March 1991.

STEP 4. Two interim reports to be submitted by December 1991.

STEP 5. Final reports submitted by April 1992.

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- latter aspect includes both the quantitative prioritisation of resource allocation, and mechanisms for effecting distribution. Other important considerations include schooling needs and how the various components of formal and non-formal schooling fit together.
- * It will look at the issue of private schooling and other private sector initiatives.
 - * This RG will need to set up a number of sub-committees to look at important areas such as Finance, Farm Schools, White Schools, and the Bantustans.
- c. How to achieve universal adult literacy and numeracy?
- * Includes literacy, numeracy and worker education.
 - * Needs to adopt a systemic approach: to consider how to optimise links between ABE programmes and other areas in the non-formal sector and formal schooling.
- d. How can educational opportunities be maximised for adults outside of formal school and beyond ABE programmes?
- * Includes formal night schools and a range of non-formal programmes.
 - * Investigate the use of technology in distance education.
 - * Special reference to providing a 'second chance' to those excluded from formal schooling as a result of Apartheid.
- e. What do different economic strategies imply for education and training?
- * Investigate skills needs of various economic scenarios and the development of appropriate human resources.
 - * Consider the relationship between technical education at the school level, on the one hand, and tertiary education, on the job training and other programmes in the non-formal sector, on the other.
 - * Think about changing public perceptions about the status and importance of non-university technical education.
- f. What should the balance of general academic and technical vocational education be in the context of People's Education?

- * work in close cooperation with the Popular Campaign on Curriculum Development, particularly in relation to the participation of teachers in curriculum development.
- * This RG will operate on three levels:
 - Investigate the curricular implications of the main options delineated by RG (c).
 - the development of general principles of curriculum development: who participates, how do the different groups fit together, how are the specialist inputs of the respective groups made accountable to each other and to a set of common goals, etc.
 - individual subject commissions in at least the following areas
 - i) The delineation of subject disciplines and the mixing of these in a balanced curriculum.
 - ii) The primary curriculum
 - iii) English
 - iv) Mathematics
 - v) Science
 - vi) History
 - vii) Instructional technology: including textbooks and the use of high tech materials
 - viii) Career guidance
 - ix) Life sciences
 - x) Libraries
 - xi) African languages
 - xii) Technical subjects
 - xiii) Religious studies
 - xiv) Health education
 - xv) Certification
- g. What would a non-discriminatory post-secondary system look like?

CENTRE FOR EDUCATION POLICY DEVELOPMENT

IMPLEMENTATION PLAN FOR EDUCATION AND TRAINING

BRIEF FOR COORDINATORS AND TASK TEAMS

OBJECTIVE

Our objective is to prepare an Implementation Plan for the education and training sector, for use by the Government of National Unity and the Provincial Governments immediately after the elections.

WHOSE PLAN IS IT?

The Implementation Plan for Education and Training (IPET) is being prepared by CEPD at the request of the ANC Education Department. It is intended to form the basis for action by ministers within the new national and provincial governments. IPET will enable the new executive and administrative authorities to act swiftly in putting new policies to work as part of the overall Reconstruction and Development Programme. John Samuel, Head of the ANC Education Department, has emphasised that the process of preparing the Implementation Plan should be as inclusive as possible. The Plan, like the ANC's *Policy Framework for Education and Training* (1994), is expected to embody a broad consensus of South African opinion on how the new national education and training system should be developed under a Government of National Unity. In undertaking the plan preparation, therefore, CEPD would welcome professional collaboration with specialists in community-based organisations, policy research and development agencies, NGOs, government departments, universities and colleges, or consultancies.

IPET is expected to guide the agendas of the new governments after their election. However, the precise shape of the governments' own plans will emerge only after the election.

POLICY CONTEXT

The Implementation Plan will be prepared within the context of the ANC's *Reconstruction and Development Programme* and the draft *Policy Framework for Education and Training*, and will endeavour to interpret these documents in programmatic terms. Since the *Policy Framework* document is still under discussion and will be revised after a national conference in April 1994, it will be necessary for Task Teams to keep in close touch with the consultative process. In the course of undertaking their work, the Task Teams may be obliged to call in question one or other aspect of the policy proposals, or to seek clarification of policy implications. Such matters should be referred to the Technical Committee or the Oversight

Committee. Where appropriate, Task Teams should suggest how the Framework Document should be improved or revised.

The national policy environment is dynamic, and Task Teams will be obliged to tap into as many sources of policy analysis as possible. The CEPD/World Bank *South African Education Expenditure Study*, which is about to be completed, will be a major source of reference for most Task Teams. The National Training Board Task Team's report on a National Training Policy Initiative will be another seminal document. The CEPD/World Bank study on Early Childhood Educare (almost completed), the National Investigation into Community Education (NICE), Edupol's study on *Teacher Salaries in South Africa* are other cases in point, and there are many more.

The Task Teams should take full cognisance of the work undertaken by Working Groups and Specialist Technical Committees of the National Education and Training Forum (NETF). While supporting the NETF process, Task Teams should not attempt to duplicate its work.

WHAT SORT OF PLAN WILL IT BE?

Technically, the IPET will be an *indicative rolling plan*.

It will be indicative (rather than prescriptive) because:

- no plans should be cast in stone: all plans should be made in order to be revised
- the baseline data are incomplete and defective, which means that all projections are subject to significant error
- there is uncertainty about the structure and functions of the new national ministry and provincial departments and their inter-relationships
- the new national and provincial governments must sanction any plans before implementation

It will be a rolling plan (rather than a fixed-term plan) because fixed-term plans are absurdly rigid and have no remedy for the inherent defects and uncertainties involved in both planning and execution. Rolling plans have a planning horizon of, say, three or five years, to facilitate the setting of objectives and the phasing of implementation. The plan is 'rolled over' every year, which means that the length of the planning horizon remains constant. Implementation targets and resource requirements are set as precisely as possible given the known deficiencies in data and other uncertainties. In practice there ought to be more precision about processes, targets and resources for the first years of the plan period than for the subsequent years.

The length of the planning horizon depends on circumstances. The longer the horizon, the greater the uncertainty and propensity to error. On the other hand, the horizon should be long enough to set meaningful objectives, especially given the length of most education cycles. For our purposes, it is sensible to adopt a five-year planning horizon, coinciding with the duration of the Government of National Unity.

A rolling plan is essentially an evolutionary process. It is designed to be evaluated, corrected, updated and revised annually, when uncompleted activities and unfulfilled targets are rolled forward and the planning horizon is pushed ahead by another year. However, IPET will be a

one-off. Our task is to provide the initial platform on which the new government authorities can take action. It is therefore essential that our implementation proposals for the immediate post-election period, say the first year, are as specific, feasible and politically important as possible. Hopefully, IPET will also influence the design, phasing and execution of the new governments' plans for the longer term.

The IPET will clearly be concerned with numerical targets for enrolment, facilities, teachers and trainers, books and other supplies, and will need to embody a defensible financial plan for the whole sector. These are essential. However, planning goes beyond quantification. ITEP will also be planning the implementation of SAQA, NICD and PICDs, NOLA the new national, provincial, and local governance structures, the national initiatives on ABE and ECE programmes, the National Commissions on Higher Education, Further Education and Special Education, the negotiation process around institutional governance, the reviews of Model C schools and private school financing.

DEADLINES

Interim Task Team reports will be required by Wednesday, March 30, 1994.

The completed Implementation Plan will be submitted to the ANC Education Department on Tuesday, April 20, 1994.

ORGANISATION

The preparation of IPET will be organised as follows:

The work will be undertaken by Task Teams headed by Task Team Coordinators. A list of Task Teams and their Coordinators is appended. Task Teams will vary in size but in principle should be small and comprise people who will work full-time, or close to full-time, until the completion of the plan document.

Cross-coordination will be undertaken by Cross Coordinators in the areas of Finance (Pundy Pillay), Planning (to be appointed), Data (Verne Kleinsmidt), Legislation (James Maseko), Governance (John Pampallis), Bureaucracy (Ahmed Essop), Gender (Linda Chisholm), and Political Liaison (James Maseko).

Administrative coordination of the IPET exercise, including contracts, financial control and approval, will be undertaken by Ahmed Essop.

Trevor Coombe will have overall responsibility for the development of the Implementation Plan, under the authority of John Samuel. JS and TC will have ex officio status on all Task Teams.

JS, TC and others by invitation will comprise the Oversight Committee, which will meet as required to review progress.

TC and all Cross-Coordination will comprise the Technical Committee, which will meet every two weeks.

All Task Team Coordinators, Cross Coordinators, JS and TC will meet four times: **on February 14 (to consider Task Team TORs, membership and processes), some time in March (to be decided), April 5, and April 20.**

Smaller groups will arrange ad hoc meetings to pursue common interests, for example in curriculum issues, teacher requirements, finance.

FORMAT

The IPET will comprise a single document, divided roughly according to the Policy Framework document, on which the division of responsibility of the Task Teams has been based. The document will be made up of individual Task Team reports, with appropriate editing for coherence and style.

The contents and format of the Task Team reports will vary according to the subject matter. In general, Task Team reports should:

- summarise policy objectives for the IP period (to 1999), drawn from the *Reconstruction and Development Programme* and the *Policy Framework for Education and Training*
- set targets and make proposals for implementation for the IP period, with special attention to RDP commitments
- give special attention to the immediate post-election period, the rest of 1994, and 1995
- make detailed proposals for the establishment of executive agencies where appropriate (SAQA, NICD, PICDs, NOLA)
- spell out details of all consultative processes and governance structures required, especially in the immediate post-election period
- propose essential legislation, especially in the immediate post-election period
- make detailed proposals for launching reviews and National Commissions, where appropriate, especially in the immediate post-election period
- provide estimates of the capital and recurrent costs of implementation, as accurately as data permits
- provide estimates of human resource requirements, facilities, books and supplies, ditto
- ensure adequate attention to policy imperatives like reconstruction and development, redress and rehabilitation, the gender issue, the implications of NQF, quality assurance, transforming the management culture, rebuilding the culture of teaching and learning, enhancing science, technology and the environment
- spell out other pre-requisites for successful implementation, including data needs or other research, support from organised constituencies, civil society and NGOs
- indicate linkages across sectors
- be absolutely clear about national and provincial responsibilities, respectively, and their mutual relationships

The text should be narrative, with essential tables (including financial estimates) or organograms incorporated in the chapter. Detailed statistical or other technical backup should be presented in annexes which may be published in a separate volume.

TASK TEAM CO-ORDINATORS

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13.	ABE	JUDY FAVISH*		
14.	FUTHER ED.	MICHAEL KAHN*		
15.	FARM / RURAL ED.	SIPHO HLOPHE*		
16.	LEGISLATION	JAMES MASEKO*		
17.	TRAINING	JONATHAN GODDEN*		
18.	ORGANISATION MANAGEMENT	AHMED ESSOP*		
19.	SUPPORT SERVICES			
20.	SPECIAL EDUCATION			
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