

FEEDING HUNGRY MINDS

A CASE STUDY OF THE NATIONAL SCHOOL NUTRITION PROGRAMME IN SOUTH AFRICA

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I. SUMMARY

In the 20th year of South Africa's democratic era; the nation is reflecting on achievements and challenges in the advancement of social and economic rights. In particular; attention has been placed squarely on government interventions towards the realisation of constitutionally guaranteed rights such as the right to adequate food. Government nutrition interventions in schools are a common way of addressing hunger and poverty. This approach recognises the impact of such interventions on children's academic performance and school attendance. In South Africa, the National School Nutrition Programme (NSNP) supports over 8 million learners across the country. The NSNP is currently only limited to learners in quintile 1 to 3 schools. While this constitutes a significant intervention for children from food insecure households, deserving learners in quintiles 4 and 5 are still excluded and in recent cases those that had been supported on the NSNP in some provinces have been 'cut off'. Furthermore- while there have been several achievements associated with the NSNP, it is imperative that several issues relating to budget adequacy, effectiveness and programme sustainability are tackled in order to ensure that limited resources are optimally utilised.

Overall, between 2013/14 and 2015/16, the NSNP budget decreased in real terms by 0.54% while a minimal real increase of 3.22% is expected over the Medium Term Expenditure Framework. Several provinces such as the Eastern Cape, Gauteng, Kwazulu-Natal and Mpumalanga experienced budget decreases to the NSNP in 2014 in real terms. It was also found that despite past underperformance of the programme in some provinces, monitoring and evaluation continues to be a weak point across all NSNP programmes. In addition, the report cautions the Department of Basic Education's against the proposed reduction of the budget pertaining to monitoring and oversight of the NSNP. Critically, this report also places emphasis on the need for a drastic review of the quintile systems regarding its influence on provisioning- or lack thereof- of vulnerable learners in quintile 4 and 5 schools.

This report concludes that while the NSNP has made substantial inroads and is a valuable intervention, the Department of Basic Education must take action to improve its current implementation in order to optimise the effective use of limited available resources.

APP	Annual Performance Plan
DAFF	Department of Agriculture, Forestry and Fisheries
DBE	Department of Basic Education
DoA	Department of Agriculture
DoE	Department of Education (currently DBE)
DoRA	Division of Revenue Act
ECD	Early Childhood Development
ECDoE	Eastern Cape Department of Education
FAO	Food and Agriculture Organisation
FEDSAS	Federation of School Governing Bodies of South Africa
ICESCR	The International Covenant on Economic, Social and Cultural Rights
IFSS	Integrated Food Security Strategy
LDoE	Limpopo Department of Education
MTEF	Medium Term Expenditure Framework
NSNP	National School Nutrition Programme
NSSF	Norms and Standards For School Funding
PFMA	Public Finance Management Act
PSC	Public Service Commission
SAHRC	South African Human Rights Commission
SANHANES	The South African National Health and Nutrition Examination Survey
SASA	South African Schools Act
UNESCO	United Nations Educational and Scientific and Cultural Organisation
UNICEF	United Nations Children's Education Fund
WCDoe	Western Cape Department of Education
WHO	World Health Organisation

“The lack of adequate food and nutrition is arguably the most critical issue facing children in South Africa today”

-SAHRC, 2013: 17



Above Left: a small school garden in Grahamstown, Eastern Cape. The garden, found in a quintile 5 school is used primarily for educational purposes; the school is not supported by the NSNP

Above right: learners from a quintile 3 school supported by the NSNP applying their knowledge and skills in a school garden assisted by a local NGO.



Above: A vegetable garden cultivated by teachers at an Early Childhood Development (ECD) Centre in Grahamstown. ECD centres fall into an unclear space where provisioning on the NSNP is concerned.

II. INTRODUCTION

Understanding government budgets in relation to the right to food is central to determining the extent to which a government is utilising the maximum available resources to address hunger. Given limited government resources; it is imperative to ensure that these are used in the most efficient manner possible to address socio economic rights. (FAO 2009) The right to food is protected in a myriad of international documents (Mapulanga-Hulston, 2009) and supported across many national constitutions. The constitution of the Republic of South Africa is no exception.

That the South African government has made substantial strides to address historical social injustice and inequality is indubitable. The formulation and implementation of progressive policy has seen important changes in access to housing, basic healthcare and education. Citing the introduction of “landmark” policies such as the South African Schools Act and the National Education Policy Act of 1996, Mestry and Ndhlovu (2014) agree that there is compelling evidence if the government’s efforts to address social justice in education. Among these have been funding interventions to support school feeding programmes.

Over the past twenty years, however, “progress in tackling malnutrition has been pitifully slow” (Save the Children, 2013). This, according the Save the Children Fund is the global ‘picture’ of the fight against malnutrition both in terms of government and donor investment. In a recent report, the international community was said to be at a crossroads (Save the Children, 2013). This was highlighted in the context of sixteen high-burden countries whose governments have developed costed plans to tackle malnutrition. The global charity organisation made a call to international donors and governments in developing countries to seize the opportunity to take action to address malnutrition. The Save the Children Fund laments the fact that despite the recognition of the cost effectiveness of nutrition interventions for a country; in the three years prior to 2013, donors only spent an average of 0.37% of total aid on nutrition interventions. It is reported that cost-benefit ratios for nutrition in reducing the burden of association diseases can be as high as 1:138 (Save the Children, 2013).

This case study uses a human rights framework as promoted by the International Commission for Economic, Social and Cultural Rights to analyse South African government budgets in addressing hunger. In particular, the focus is placed on the DBE’s National School Nutrition Programme (NSNP). According to the FAO (2009); budget analysis allows both civil society and government to assess the efficiency and effectiveness of resource use.

As a starting point- the Preamble to the South African Schools Act (SASA) 84 of 1996 outlines the need for “...a new national system for schools which will redress past injustices in education provision, provide an education of progressively high quality for all learners...contribute to the eradication of poverty and the economic wellbeing of society,...and;...it is necessary to set uniform norms and standards for the education of learners at schools and ... governance and funding of schools throughout the Republic of South Africa...”

In addition to the Constitution, the National Norms and Standards for School Funding provide a useful background to South African education budgets in relation to attempts to redress issues of past inequality and inequity within the country’s education system. It is important to keep in mind, therefore that;

“In terms of our Constitution and the Government’s budgeting procedure, the national Ministry of Education does not decide on the amounts to be allocated annually for provincial education departments. This is the responsibility of provincial governments and legislature, which must make

95 *appropriations to their education departments from the total revenue resources available to their*
96 *provinces. Thus, each province determines its own level of spending on education, in relation to its*
97 *overall assessments of needs and resources.”¹*

98 And finally (and perhaps most critically) that;

99 “...the national and provincial levels of government will honour the state’s duty, in terms of the
100 Constitution and the SASA, to progressively provide resources to safeguard the right to education of
101 all South Africans. However, education needs are always greater than the budgetary provision for
102 education. To effect redress and improve equity, therefore, **public spending on schools must be**
103 **specifically targeted to the needs of the poorest.**”²

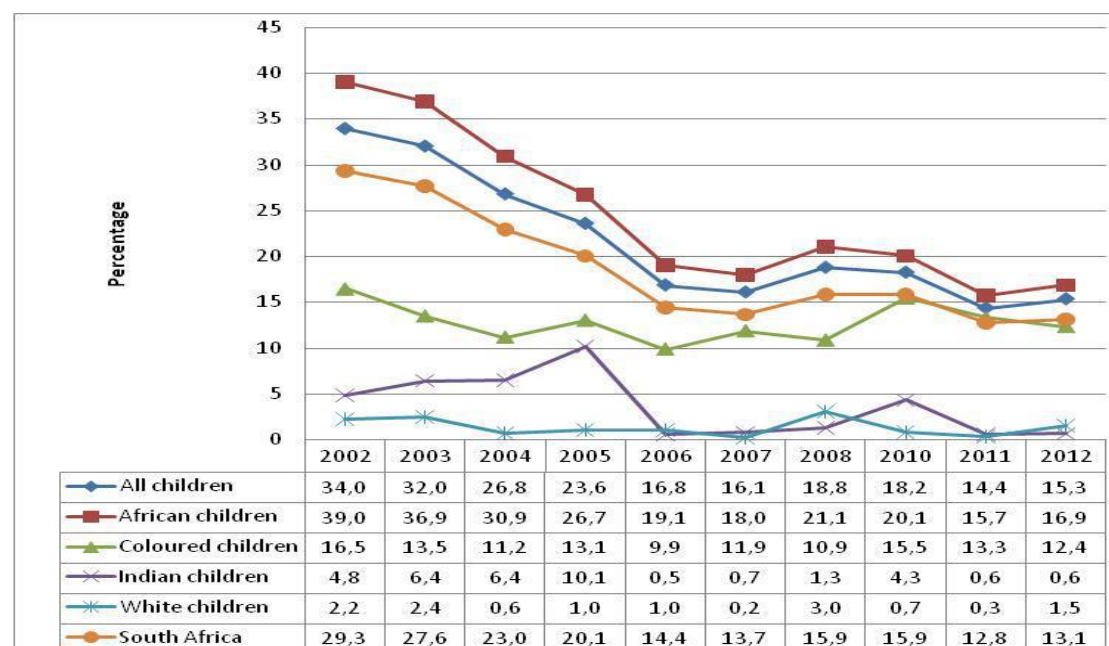
104 This report is concerned specifically with the NSNP and government provisioning for children’s right
105 to food within the public schooling system. According to a Statistics South Africa’s Report;
106 *Vulnerable Social Groups*, the vast majority of South African children still live under conditions of
107 poverty, facing significant inequality and poor health outcomes (StatsSA, 2013b). The impacts of
108 poverty and inequality have far-reaching implications for all high-burden countries. Adults who
109 experience malnutrition during childhood, for example, are estimated to earn at least 20% less on
110 average than those who did not, as children, experience malnutrition (Grantham-McGregor *et al*,
111 2007).

112 Between 2011 and 2012, the percentage of children living in households that reported hunger
113 increased in the majority of populations (Figure 1). Between 2010 and 2011, however, a comparative
114 look at the number of people living in households reporting hunger reflected significant decreases.
115 Between 2010 and 2011, the percentage of all children living in these households decreased from
116 18.2% and 14.4%. The proportion of all South Africans living in households that reported hunger
117 decreased from 15.9% to 12.8% between 2010 and 2011. This percentage increased to 13.1% for all
118 South Africans, 15.3% for all children and 16.9% for African children in 2012 (Figure 1).

¹ Section 41 of the National Norms and Standards for School Funding GN 232-62 GG 19347 of October 1998. Notice in terms of the South African Schools Act 84 of 1996, and section 3(4)(g) of the National Education Policy Act 27 of 1996.

² Ibid; Section 44 (emphasis added).

Figure 1: Percentage of Children Living in Households that Reported Hunger (Extracted from StatsSA 2013b)³



According to the South African National Health and Nutrition Examination Survey (SANHANES, 2013), almost 25% of South Africans are at risk of hunger and another 25% experienced hunger. The research team outlined the need for the South African government to prioritise all aspects of food security while establishing a task team to focus on short, medium to long term food security interventions for the various affected populations. Figure 1, taken from a report published by Statistics South Africa (StatsSA, 2013b) shows the percentage of children living in households that reported hunger between 2002 and 2012. The average for all children reflects that 15.3% of children in South Africa in 2012 lived in households that reported hunger. ‘African’ children were identified as the most likely to be living in household reporting hunger (16.9%) and the lowest percentage was amongst Indian children in 2012 (0.6%). The overall self-reported percentages of South African households experiencing hunger appears noticeably lower according to the StatsSA (2013b) report as compared to the SANHANES. The overall national average has decreased from 29.3% in 2002 to 13.1% in 2012 (StatsSA, 2013b).

A high percentage of South African children in rural areas depend on wild-growing foods (fruit, green leafy vegetables and roots) to supplement their daily nutritional needs as a result of living in food insecure households. A school-based study released in 2009, for example, revealed that 64% of school children and 40% of non school-going children supplemented their diets with wild foods (McGarry and Shackleton, 2009). In addition to enjoying the taste of the wild foods, children cited hunger as reasons for eating them (McGarry and Shackleton, 2009). Children from rural communities are particularly vulnerable to hunger. There is a need, however, to map out the extent of food insecurity in rural and urban contexts as there may exist significant differences not only between but also within these contexts. This report also posits the need to review the exclusion of some children from a specific food security intervention; the NSNP.

Koch (2011) argues that South Africa is not likely to be given a priority ranking on the international agenda on food security given its status as a net exporter of agricultural commodities. Other reasons

³ Statistics for the year 2009 were not available owing to a change in data collection methodology according to StatsSA.

Koch (2011) gives for this is that South Africa is not landlocked, possesses an “innovative” constitution and has “no tight foreign exchange constraints”. In addition to this according to studies by the Food and Agriculture Organisation (FAO), World Health Organisation (WHO) and the United Nations Educational and Scientific and Cultural Organisation (UNESCO), the three primary dietary deficiencies in South Africa are iron, Vitamin A and iodine.

In a study carried out in a peri-urban settlement of the Eastern Cape, it was found that while people’s dependence on wild foods has decreased; people from food insecure households still make use of various wild leafy vegetable species to supplement household diets (Kota and Shackleton, 2014). Furthermore, even though South Africa is not ranked amongst the countries that are hardest hit by hunger, South Africans are particularly vulnerable to micro-nutrient deficiencies (DoE, 2004). This has critical implications for children; as micronutrient deficiency in the early stages of life have deleterious implications. According to Georgieff and Rao (1999), iron deficiency prior to 3 years of life can have significant and potentially permanent impacts on myelin which in turn has damaging effects on nerve cells in the brain that facilitate the rapid transmission of information and other complex neural processes. Combined with other factors, maternal and infant iron deficiencies place children at increased risk for future mental and physical impairments.

In 2000, the Integrated Food Security Strategy (IFSS) was launched with the aim of creating a comprehensive, multisectoral approach (government and civil society), towards addressing food insecurity in South Africa. The lead department for the implementation of the strategy was the Ministry of Agriculture and Land Affairs. The IFSS was designed for integration across various government departments to focus on public spending on enhancing food security of historically disadvantaged populations (DoA, 2002). The post-apartheid government created distinct policies that saw increased spending in areas such as school feeding, free child health services, child support grants, maternal health and pensioners (DoA, 2002). The IFSS initially became the IFSNP (The Integrated Food Security and Nutrition Programme). Then in 2013, a National Policy on Food and Nutrition Security was created following a review of the IFSS. A document published by the Departments of Social Development and Agriculture, Forestry and Fisheries; three reasons were given for the need of a new strategy;

- i. To establish common definitions and measures for food security and nutrition in South Africa aligned with the National Development Plan 2030
- ii. To provide an over-arching guideline for government and civil society interventions and synergies
- iii. To provide parameters for South Africa’s regional and international obligations for food security

This revised policy identifies key dimensions of food security; adequate availability of food; physical, social and economic accessibility of food; utilisation, quality and safety of food, and stability of food supply (DAFF and DSD, 2013). Also outlined are key ‘pillars’ of food and nutrition security amongst which are effective food assistance networks which “could include an expanded and enhanced school nutrition programme”. Most recently (22nd August 2014), the Department of Agriculture, Forestry and Fisheries (DAFF) gazetted the ‘National Policy on Food and Nutrition Security for the Republic of South Africa’. The policy is intended as a key component of delivery against the objectives of the National Development Plan (NDP). The implementation of the policy is to be primarily lead by DAFF and the Department of Social Development.

That “South Africa has enough food for its people” (Brand, 2009) is an important assertion given the statistics on self-reported hunger and food insecure households. The South African National Health and Nutrition Examination Survey (SANHANES 1, 2013). It is thus important to delve into the status of the right of access to adequate food in the country. South Africa is amongst the many nations whose constitutions contain provisions guaranteeing certain economic, social and cultural rights. The International Covenant on Economic, Social and Cultural Rights (ICESCR) is the principal international document that obligates governments to respect, protect and fulfil the economic, social and cultural rights enumerated within it. It is against the backdrop of both constitutional and international obligations that the Department of Basic Education’s NSNP will be scrutinised in this report.

The SAHRC (2013) also notes the particular vulnerability of children given their nutritional requirements for growth and development and their dependence on adult caregivers for the provision of basic resources such as food and water. “The lack of adequate food and nutrition is arguably the most critical issue facing children in South Africa today” (SAHRC, 2013: 17). The DBE has acknowledged shortcomings in the provisioning of food to learners in the NSNP. It has been reported to the SAHRC that some provinces have failed to ensure the implementation of the prescribed menus, partially as a result of corrupt activities in some provinces and partly due to a lack of capacity in others (SAHRC, 2013). While this report does not explore the instances and effects thereof, corruption and maladministration have been inadequately investigated and reported on. In several cases, provincial education departments’ annual reports point to ‘ongoing investigations’ with long delays in disciplinary procedures. The impact on delivery of food to learners of corruption and poor capacity is certainly deserving of in-depth research.

Lastly- it is important to assert that while highly useful; budget analysis does not encompass the entire spectrum of complexity when it comes to the right to food but forms an important foundation. In the same way that improved funding policies and increased budget allocations do not provide solitary solutions to inequality; it is important to focus on systemic, qualitative interventions as well.⁴

III. OBJECTIVES OF THE CASE STUDY

This report attempts to explore core aspects of budgeting for the right to food in South Africa by focussing on one component of government food security interventions. As mentioned above the NSNP has been a core aspect of IFSS, IFSNP and now the National Policy on Food and Nutrition Security. A primary objective is to examine key budgeting and planning trends of the NSNP.

It is important to conceptualise this case study within the broader umbrella of a variety of other nutrition interventions within the IFSS or Nutrition Security Policy. Given the limited coverage of the NSNP (food is served only on school days and once a day), it cannot – and should not- be viewed in the same light as more comprehensive nutrition programmes would be. This case study is therefore

⁴ This case study is extracted from a larger research paper that also considers- in addition to issues of costing, non-financial public resource management questions.

premiered on the assumption that the NSNP is merely one of several government interventions intended to address issue of food insecurity and malnutrition in South Africa. In addition to these, the recently gazetted Food and Nutrition policy outlines several interventions that are implemented and promoted by various government custodian departments such as the Vitamin A supplementation programme of the Department of Health. The policy acknowledges that addressing malnutrition and food insecurity is a complex process that requires interdisciplinary interventions.

IV. A BRIEF HISTORY OF THE SCHOOL NUTRITION PROGRAMME

a) PROGRAMME INCEPTION AND STRUCTURE

The NSNP was first introduced as part of a poverty alleviation strategy in 1994 by the newly democratic South African government within the Reconstruction and Development Programme (DoE, 2004). Its inception was announced by Nelson Mandela during his State of the Nation Address on the 24th May 1994 and was officially introduced into schools in September 1994 (Zafar *et al*, 2005). The programme was initially housed within the Department of Health (DoH) and experienced mixed success. According to the manual and guiding document produced by the DoE in 2004, the DoE commenced its version of the NSNP on 10th April 2004 focussed on primary schools in quintiles 1 to 3. Several models of delivery of the NSNP were implemented following the move of the programme from the DoH to the DoE. In the Eastern Cape, for example, this included the;

- i. Centralised Model (implemented entirely by the ECDDoE),
- ii. the Cooperative Model (implemented by schools and communities) and the
- iii. Decentralised Model (implemented by the district and schools) (Fumba, 2007).

In the custodianship of the DoE, the NSNP also experienced several problems including the complete collapse of the programme in the Eastern Cape in 2006 (Fumba, 2007). A detailed outline of the provincial department's attempts to solve the problems highlighted the need for district and school administrators to follow administrative requirements after reports of "...irregularities and fraud that have crippled the programme" (Appendix: Extract 1). On a national scale, several research and media reports showed the programme was beset with many challenges. Amongst these were irregular feeding times at school, nutritionally poor quality of food, late delivery of food to schools, poor geographical coverage and poor programme performance as a result of inadequate human resource capacity (Zafar *et al*, 2005).

In 2006, a survey by the Fiscal and Finance Committee highlighted the need to extend coverage of the programme. In response to this, the Minister of Finance at the time outlined a budget that also included secondary school learners in quintile 1 (DoE, 2009) in October 2008. The NSNP is funded primarily through a conditional through quarterly transfers to provinces. At the level of the DBE, the programme is located within the Care and Support in Schools sub-programme and is aimed at improving access and learning (DBE, 2013). Between 2012/11 and 2013/14, the NSNP saw an increase in its budget allocation in order to include all primary and secondary learners in quintiles 1 to 3. All public schools are categorised on a national ranking mechanism from quintile 1 – 5 with quintile 1 comprising of the most poorly resourced schools serving learners from the most vulnerable households. Currently, all learners in quintile 1 to 3 schools, which are also non fee-paying schools, and selected special schools are targeted on the NSNP (Wenhold *et al*. 2013).

Provincial departments of education are accountable for the management and utilisation of the funds as well as the monitoring of implementation. The various roles of the DoE, provincial departments, school governing bodies, principals and educators were outlined according to the Division of Revenue Act (DoRA), the South African Schools Act (SASA) and the Public Finance Management Act (PFMA). The national department is responsible for– amongst other things– planning the conditional grant, developing the necessary NSNP guidelines, monitoring provincial expenditure (and accounting to national Treasury) as well as providing support to provincial departments. At school and district level, each provincial department provides funding for the NSNP to schools based on the quintile classification.

Currently, the two primary models used in procuring food for the NSNP nationally are the centralised and decentralised. The former is followed in Gauteng, KwaZulu-Natal, Limpopo, Mpumalanga and Western Cape. The latter is used in the Eastern Cape, North West, Free State (Wenhold *et al*, 2013). Through the decentralised model of procurement, money for the NSNP is transferred to individual schools and school committees are responsible for inviting and awarding tenders for food suppliers from local communities. While parents and community members may be involved in the school’s NSNP, it is envisioned by the DBE that that school must create a ‘school nutrition committee’ that- amongst others- includes food handlers, a gardener and the school’s NSNP coordinator. This structure is in many respects distinctly different to that of the school governing body (SGB).

In the centralised model, food suppliers are contracted through a tender system via provincial education departments. Both appointment and payment is thus done centrally by the head office with districts playing an important administrative role after the disbursement of funds from the province. The awarding of tenders is guided by the Preferential Procurement Policy Framework Act, 2000. (Wenhold *et al*, 2013). Prior to 2004, food served on the NSNP was initially a fortified biscuit or peanut butter sandwich for primary school learners. Currently, DBE regulations stipulate the serving, by 10h00 daily on school days of a cooked meal that accounts for at least 30% of a child’s daily nutritional requirements (DoE, 2009).

In more recent times, however, several problems have continued to plague the NSNP; most notably in provinces such as Limpopo (2012) and the Eastern Cape where allegations of tender fraud, corruption and maladministration of grant funds have been rife (Appendix: Extract 2)

b) OBJECTIVES OF THE NSNP AND LEGISLATIVE FRAMEWORK

In addition to the right to access to food as enshrined in the constitution, the NSNP aims to “foster better education by enhancing children’s active learning capacity” in addition to this, the programme seeks to “address barrier to learning associated with hunger and malnutrition by providing nutritious meals to learners on all school days” (DBE, 2013). According to the DoE (2009), the objectives of the NSNP are to:

- i. contribute to improving the learning capacity
- ii. promote self-supporting school food gardens and other production initiatives
- iii. promote healthy lifestyles amongst learners

The South African Human Rights Commission (SAHRC) outlines state obligations on the right to food to include the creation of an enabling environment in which all people are able to exercise their right to food. This is inclusive of policies and legislation geared at adequate food supply and

distribution. The SAHRC also highlights the state's obligation in the delivery of public education on the right to food (SAHRC, 2004). Embedded in Section 26 and 27 of the South African Constitution are the state's obligations to ensure that everyone has the right to sufficient food and water (s.27(1)(b)) and according to Section 27(2) that;

"The state must take reasonable legislative and other measures, within its available resources, to achieve the progressive realisation of each of these rights."

Prior to the recent policy on food and nutrition security, the framework guiding all government departments responsible for the fulfilment of this right across all spheres of government was limited best. Its effectiveness remains to be seen as the policy implementation plan is within its draft/planning stages.

Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) outlines states' obligations to "to recognise the right of everyone to adequate food and requires active interventions on the part of states to counteract hunger." According to General Comment No. 12 of the ICESCR, the right to adequate food is realised when "...every man, woman and child, alone or in community with others, has physical and economic access at all times to adequate food or means for its procurement."

The significance of the NSNP in the lives of many learners from food insecure households should not be underestimated. This was starkly highlighted by a Public Service Commission evaluation in which learners in Limpopo commonly used NSNP food in a form of 'stokvel'. This informal practice amongst learners allowed small groups of learners to jointly accumulate food provided on the NSNP to take home to their hungry families (PSC, 2008). While this was not a central finding to the research, but an anecdotal observation, it is an important indicator of a possible need to interrogate the adequacy of provisioning within the programme.

V. BUDGET ANALYSIS AND STRATEGIC PLAN EVALUATION OF THE NSNP

a) ADEQUACY⁵ OF OVERALL NSNP BUDGET

The NSNP currently supports more than 9 million children nationally. In 2011, with a total public school-going population of 12 287 994 (12.3 million). Approximately 70% of all children attending basic education institutions in South Africa were fed on the programme. In 2013/14 feeding 9 131 836 (9.1 million) learners; 76.3% of all learners in public schools were fed on the NSNP (DBE, 2014). The majority of the learners fed are those in No Fee schools. In its 2013/14 Annual Report, the DBE reported that there were a total of 8.8 million (8 770 644) learners benefitting from No Fee schools, equating to 77.6% of all learners nationally. The highest coverage was reported in the Eastern Cape (92.9%; 1.6 million learners), the North West (93.1%; 178 000) and Limpopo (96.2%; 1.59 million learners). The lowest percentage was reported in the Western Cape (39.5%; 374 000 learners) and Gauteng (61.9%; 1.11 million). These percentages of learners benefitting from the programme correlate to some degree with the number of learners benefitting from No Fee schooling; the largest numbers of such schools exists in the Eastern Cape. However, given the relative dynamism of the education landscape (learner migration, school closure, attrition rates), information about the

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distribution of vulnerable learners needs continuous updating in order to effectively and efficiently respond to change.

The question of ‘adequacy’ attempts to determine the degree to which resources allocated for food programmes are transferred to departments can be said to be sufficient given the demand and the costs of the intervention. In addition to this- it is important to consider that budget allocation trends; are budgets increasing in real terms over time? Are allocations regressive or progressive? (What justifications and explanations are provided in departmental budget and planning and documents?

Table 1: Provincial and National NSNP Expenditure and Allocations: 2010/11 to 2016/17 ((National Treasury, 2014), (Division of Revenue Act, 2014) and (relevant Estimates of Provincial Revenue and Expenditure, 2014))⁶

Province ('000 Rand)	2010/11	2011/12	2012/13	2013/14			2014/15	2015/16	2016/17	Nominal Change Over MTEF	Nominal Change Between 2013 and 2014 (%)	Real Change Between 2013 and 2014 (%)
Eastern Cape	696,723	838,925	892,095	949,162	949,162	949,162	984,548	1,020,116	1,074,182	2.95	3.73	-2.29
Free State	189,926	248,201	257,762	274,552	274,820	274,820	299,205	317,157	333,966	3.73	8.87	2.55
Gauteng	358,975	468,832	584,640	585,157	616,516	616,516	640,541	678,974	714,960	3.73	3.90	-2.13
Kwazulu Natal	855,285	1,144,368	1,085,489	1,206,190	1,206,190	1,206,190	1,237,534	1,287,034	1,355,247	3.08	2.60	-3.36
Limpopo	654,383	779,024	959,029	932,050	932,050	932,050	991,153	1,030,799	1,085,431	3.08	6.34	0.17
Mpumalanga	396,785	447,973	506,561	496,661	504,835	504,835	524,913	545,910	574,843	3.08	3.98	-2.06
North West	250,289	311,080	323,345	348,912	354,858	354,858	366,890	381,566	401,789	3.08	3.39	-2.61
Northern Cape	84,536	105,116	113,136	119,859	119,859	119,859	134,645	142,724	150,289	3.73	12.34	5.82
Western Cape	169,775	230,041	236,669	260,538	265,103	265,103	282,486	299,435	315,305	3.73	6.56	0.37
National	3,663,326	4,578,752	4,906,464		5,173,081		5,461,915	5,703,715	6,006,012	3.22	5.58	-0.54

Table 1 outlines provincial and national NSNP expenditure and projected allocations. Also reflected in Table 1 are the nominal and real changes between 2013/14 and 204/15 financial years. In terms of nominal increases from the 2013/14 adjusted appropriation, the highest nominal increase is expected in the Northern Cape Province (12.34%); equating to a real increase of 5.82%. The Eastern Cape and Kwazulu-Natal constitute the two biggest education departments with the highest numbers of learners; a fact reflected in the respective budget allocations. The Eastern Cape is the province with the highest proportion of schools that are *de facto* eligible to be supported by the NSNP by virtue of being non-fee paying schools. Interestingly, Kwazulu-Natal has a comparatively low percentage of learners in No Fee schools.

⁶ Figures in this table are expressed in nominal terms with an indication of the real change between 2013/14 and 2014/14 as well as the nominal change in allocation over the MTEF. For provincial and national budget allocations expressed in real terms (2010/11 to 2013/14) – refer to Table 3 in the Appendix.

a) **EFFICIENCY⁷ OF ALLOCATIONS AND USE OF MAXIMUM AVAILABLE RESOURCES: Under spending trends**

Expenditure in 2013/14 for each of the provincial departments reflects positive trends. This is despite under-expenditure in several departments prior to 2012/13. The KZNDoe under spent on the NSNP by R 93.8 million in 2012/13 and by R 27 million in 2011/12 (KZNDoe, 2013; Treasury, 2014). The Western Cape Department of Education under spent on its 2012/13 NSNP budget of R 245 million by 3.6% (WCDoE, 2013). The reasons for this and other provinces' under spending on the programme varies but often relate to late invoices for food supplied, late payments of suppliers and/or food handlers. Findings of a budget analysis released in 2013 by the PSAM revealed that the NSNP was one of three programmes to which an overall departmental under expenditure of R 691.9 million (2.6%) was attributed (2012/13 budget) in the Eastern Cape. Positively, however, the ECDoE nutrition programme remains, generally financially stable in as far as financial management and reporting at the level of Head Office. To determine the true state of affairs; a forensic evaluation that is inclusive of school-level financial management is necessary given the decentralised nature of the programme in the Eastern Cape.

EQUITY, NON-DISCRIMINATION AND PRIORITY OF ALLOCATIONS⁸; reaching the most vulnerable of all; quintile targeting

Amongst the important areas in need of further research is the efficacy using the quintile system as a measurement in as far as reaching the most vulnerable learners regardless of the 'wealth' of their school is concerned. As will be discussed, a concern of the SAHRC is the lack of support for learners who are food insecure in quintile 4 and 5 schools as the NSNP covers the first three quintiles only. Inversely, Wenhold *et al* (2013), reporting on focus group discussions of educators and learners in the Eastern Cape and Limpopo, outline the fact that even within quintile 1-3 schools; not all learners targeted for feeding are food insecure, leading to significant food wastage in some instances. This report illustrates that, in some cases, learners who are targeted on the programme may be from food secure households and- as a result- prefer to provide their own food.

The most recent Annual Report of the NSNP (2013/14) states that compared to the previous year (2012/13), the number of learners fed on the programme decreased by 718 252. The reason given for this related to "non-submission of quarterly performance indicators by provinces" (DBE, 2014). This should be a cause for concern i.e not knowing how many children are actually fed in some provinces.

The NSNP in its current form is not designed to reach all South African learners. It is also not currently reaching all vulnerable learners within the schooling system. The trends reflected in Figure 2 in relation to the geographic spread of the NSNP may be said, however, to loosely reflect the areas of greatest vulnerability or food insecurity. This is not, however, explicitly outlined in NSNP annual reports nor is there an indication of the basis on which targets are rolled out. A particularly telling fact is that whilst the data from provincial departments of education are vital, the DBE itself relies not on this data but on Statistics South Africa data in order to determine the percentage of children that receive a daily meal on the NSNP. This is in spite of the fact that this is an indicator (25) within the

⁷ This is an important question that explores how (and if) funds are spent on the intended purpose or whether they are redirected, lost or wasted.

⁸ The 'equity and non-discrimination' question attempts to characterise the spread of allocations and the extent to which the spread (geographic, demographic) is equitable and reasonable given the objectives of the NSNP. In addition, this question explores the extent to which resources are utilised to prioritise and ensure coverage for the needs of the most vulnerable and to reduce disparities in access to sufficient, nutritious food.

DBE's own strategic plans. In addition to this, provincial departments are not in a position to accurately determine whether or not quality school meals actually reach the intended target groups and with what frequency (Wenhold *et al*, 2013).

Table 2: Number of learners benefitting from NSNP in Limpopo 2010/11-2016/17 (LDoE, 2014)

PROGRAMME PERFORMANCE MEASURES FOR PROGRAMME 2.								
Performance Measure		Audited / Actual performance			Estimated performance	Medium Term Targets		
		2010/11	2011/12	2012/13		2014/15	2015/16	2016/17
PPM 205	Number of learners with access to the National School Nutrition Programme (NSNP).	1435516	1,591,029	1,585,630	1,612,695	1,593,715	1,593,715	1,593,715

Between 2011/12 and 2012/13 the number of learners that were fed on the programme in Limpopo was decreased. A total of 4 399 fewer learners were fed in 2012/13 (Table 2). Between 2013/14 and 2014/15 a similar trend is expected with considerably fewer numbers of learners being fed. The programme will be feeding 18 980 fewer learners in Limpopo in 2014. Despite this huge reduction in the number of learners accessing the feeding programme, the budget increases by 0.17% in real terms– from R 932.1 million to R 991.2 million, equating to 6.34% in nominal terms.

The number of beneficiaries of the NSNP exceeded the targets set in 2013. The DBE (2013:154) reported that the reason for this positive variance of targeted learners and the number that were actually fed on the NSNP in 2013 was a result of increases in the number of learners in several provinces including Limpopo. The Western Cape, North West and Eastern Cape were the other provinces that contributed to the 2013 NSNP target being overshoot by 267 685 learners. With respect to Limpopo, it would appear that the number of learners fed on the programme increased between 2012 and 2013 and then decreased radically between 2013 and 2014. While the numbers of learners fed is reported by departments on a quarterly or annual basis, detailed justification for changes benefitting learners is often omitted. This presents an obstacle for valuable monitoring evaluation. The LDoE reported, however, that the number of No-Fee schools was decreased from 3 861 to 3 832 between 2012/13 and 2013/14 (LDoE, 2014:170) which appears to contradict the DBE's justification for the variance in learner numbers. A possible explanation for this is the merging of No Fee schools.

Between 2014/15 and 2016/17; the number of learners targeted on the NSNP in Limpopo is set to remain stagnant at 1.59 million learners. While the province has no plans to build new schools in 2016/17, 42 are planned for 2014/15 and 2 in 2015/16 (LDoE, 2014: 102). It is not clear whether the 42 schools to be built will require support from the NSNP as data for the planned establishment of No-Fee schools is contained in the most recent LCDoE Annual Performance Plan beyond 2013/14.

Figure 2: Nominal Change between 2014/15 and 2016/17 and Real Change between 2013/14 and 2014/15 (%)

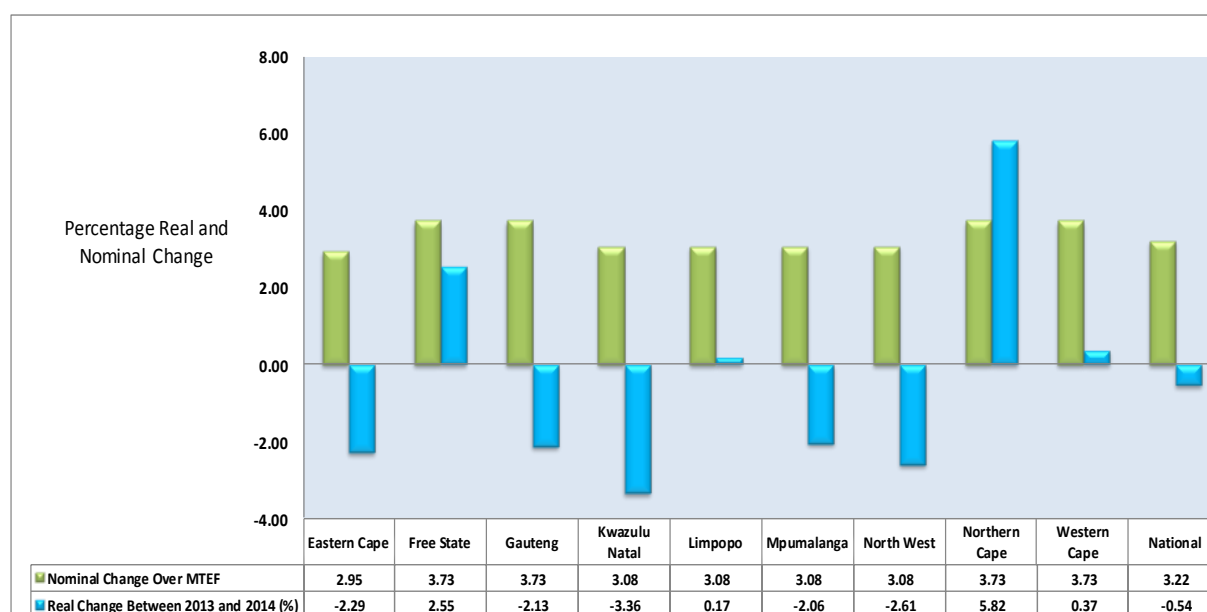


Figure 2 outlines the nominal change in the budget for the NSNP between 2014/15 and 2016/17 (MTEF). Also illustrated is the real change between 2013/14 and 2014/15 for each of the provincial departments as well as for the national department. The majority of the DBE's support for this programme is through the conditional grant transfers to provinces (Treasury, 2014). The national budget reflects a real decrease of 0.54% between 2013/14 and 2014/15. In addition to this, the majority of provinces also reflect budget decreases in real terms; 2.29% in the Eastern Cape, 2.13% in Gauteng, 3.36% in KwaZulu-Natal, 2.06% in Mpumalanga and 2.61% in the North West province (Figure 2). The Free State and Northern Cape provinces at 3.73% and 5.82% respectively reflect the most notable increases in real terms. There is no clear explanation in the relevant documents for this variation.

Given the fact that over the past few years several departments have tended to reduce targets for NSNP beneficiaries only to deviate from or overshoot the reduced targets, the reduction of some budgets in real terms is concerning. If, as the DBE intends, learners in special schools are to be formally included in forthcoming targets— how is this to be achieved within current budget allocations? In the Gauteng province, for example, reductions in the 2014/15 budget for the NSNP have been accompanied by a reduction in the numbers of learners fed. There are a few changes worth noting over the MTEF. In the first instance, the DBE outlines the following according to a National Treasury publication (2014);

*“(T)o give effect to Cabinet approved budget reductions, the department will reduce spending in this programme by R 3.2 million over the medium term on the administration portion of the national school nutrition programme grant. These reductions are to be mainly effected in spending on travel and subsistence through implementing efficiency measures such as **reducing the size of teams that travel on oversight visits...**”*

The Department states that these reductions will not have a negative impact on service delivery. Given past and current evidence to the contrary, there is a great need for more effective and regular

monitoring of the NSNP across all provinces, these budget reductions may well prove to be ill-advised. In 2008, the Public Service Commission (PSC) found that in both Limpopo and the Eastern Cape, schools reported weak monitoring and evaluation of the NSNP by departments despite frequent reports of corruption. Similarly, a series of UNICEF (2008) reports across the nine provinces found that monitoring and evaluation systems at both provincial and district level were very weak. More recently, a 2010 expenditure tracking survey carried out by the Public Service Accountability Monitor revealed similar problems and recommended ways in which monitoring of public resource flows in the programme could be better facilitated. It is important to note two things; firstly that since each of these evaluations was carried out- some of these provincial delivery models have been changed and secondly that there has been a limited number of recent, evaluative studies carried out in a comprehensive manner. This is especially critical for provinces whose nutrition programmes are decentralised. It can be assumed that while the decentralisation of procurement, supplier appointment and payment from province and district to school level can increase programme efficiency, the increased scope of such processes requires greater rigor where monitoring and oversight is concerned.

In the third quarter of 2013/14, the DBE reported that in 70 schools across 5 districts on Kwazulu-Natal and in 150 schools across 4 districts in Limpopo there was no feeding of learners. It is thus rather disconcerting only 150 schools nationally were subjected to monitoring by the DBE.

Equity and Quintile Targeting

As previously noted, the DBE reduced the number of learners fed on the NSNP in 2013/14 by approximately ½ million learners (from 9.2 million to 8.7 million) owing to the extension of the programme to ‘additional learners’ that provincial departments had fed from ‘their own budgets’. It is not clear whether alternative measures have been put in place to mitigate against potentially negative impacts and support these ‘additional learners’. Effectively, the programme had been extended to feed ineligible learners. There have, according to reports, been further cuts reported at the provincial level in 2014/15. The impact of these reductions, it appears, has been under-estimated by the DBE. On the 3rd October 2014, the Federation of Governing Bodies of South African Schools (FEDSAS) announced that 64 000 learners in the Gauteng province would be cut off from the NSNP. This, according to FEDSAS, is a result of the learners being in quintiles 4 and 5 schools and thus being ineligible to be supported by the programme (Appendix: Extract 3). Similar reports were made in national media in 2012 in which hundreds of schools in Kwazulu-Natal appealed for support in feeding hungry learners within the wealthiest school categories; quintiles 4 and 5 who– according to the NSNP policy– fall outside the realms of eligibility (Appendix: Extract 4).

The South African Human Rights Commission (SAHRC) highlights the fact that despite the wide geographic reach of the NSNP, the programme is still only accessible to learners in quintiles 1 to 3. Importantly, according to SAHRC (2011), there are “no measures or commitments in place to facilitate access to school nutrition for learners in quintiles 4 and 5”.

The CEO of FEDSAS emphasises this point; “(P)eople should not make the mistake of thinking that there are not hungry children in quintile 4 to 5 schools. There are talk (sic) of providing learners with tablet computers yet some of these learners are unable to concentrate in class due to hunger” (Appendix: Extract 3). While it is evident that the majority of learners in the most impoverished schools are likely being supported by the NSNP, there is a lack of clarity around the number of eligible learners that are currently in quintile 4 and 5 schools.

If, therefore, these learners are no longer fed; either through schools' discretionary funds nor through the equitable share, the discontinuation of this programme for 500 000 learners that have previously been supported on it may arguably constitute discriminatory budgeting⁹. In taking the ICESCR Article 2 into consideration that prohibits discrimination on a wide range of grounds- learners from historically oppressed and marginalised groups that are excluded from the NSNP may suffer the same consequences as targeted learners. The KZNDoE in 2012/13 was granted permission by the DBE to deviate from the NSNP bias towards learners in quintiles 1 to 3. The KZNDoE was thus able to feed primary school learners in quintiles 4 and 5 on the condition that "the minimum requirements of the NSNP conditional grant are being met" (KZNDoE, 2013). In the case of the Gauteng province, it is unclear whether the non-feeding of quintile 4 and 5 learners was related to the Department's inability to meet the minimum requirements of the conditional grant or if the decision was a response to policy restrictions.

In addition to raising questions relating to the 'ineligibility' of learners as a result of their school quintile classification- there have been historical challenges to the very quintile system used to target learners. The Norms and Standards for School Funding (NSSF) require that schools are funded according to the quintile system using a predetermined formula. As it determines what resources a school is eligible to receive- the quintile ranking has significant consequences for a school and its learners. Given the grave consequences for learners as discussed above, there is a real need to review the allocation of this particular conditional grant through the NSSF.

In conclusion to a research report outlining the implication of the NSSF on redress and social justice, Mestry and Ndhlovu (2014), advocate for the need to fund schools according to their "*essential needs and the socio-economic status of parents attending the school rather than the poverty index of the community where the school is located*". They further state that this will effectively address the problem in which learners from poor households attending schools in affluent areas are not catered for as a result of their quintile 4 or 5 classification. According to Mestry and Ndhlovu (2014), examples where schools in quintile 4 or 5 in reality serve a large majority of poor learners are placed in a "*diabolical situation*". It has therefore become critical to find improved, nuanced solutions to strengthen government responses to the existing obstacles to equal access to education in South Africa. A thorough review (and/replacement) of the quintile system is long overdue. In addition to the need to address the exclusion of eligible learners as a result of attending 'affluent' schools is the need to review the extent to which early childhood development centres and special schools are catered for within public school feeding programmes. Their prominence in NSNP policy documents is decidedly weak.

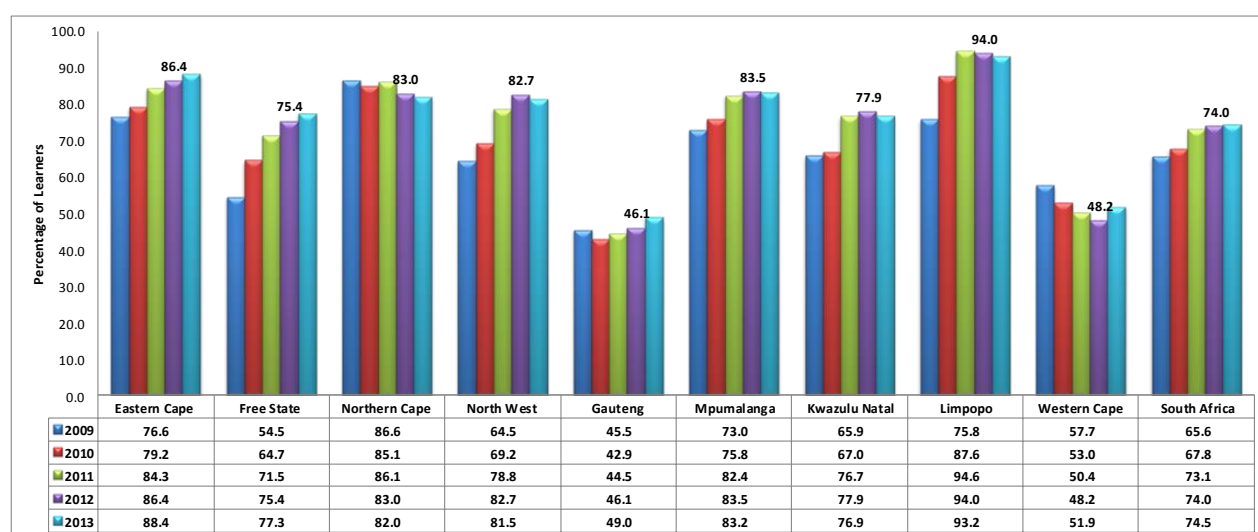
Accuracy of data to inform NSNP interventions

The picture presented by the Statistics South Africa General Household survey is slightly different to the reports from the DBE in relation to percentages of learners benefitting from the NSNP (Figure 3). In general, the percentage of learners reportedly supported by the NSNP has increased over the past five years. The highest provincial coverage for 2012 was evident in the provinces of Limpopo (94%), the Eastern Cape (86.4%) and Mpumalanga (83.5%). These figures also correlate with the

⁹ "The UN Committee on Economic, Social and Cultural Rights (CESCR) in its General Comment 20 makes clear that ICESCR article 2(2), which prohibits discrimination on a wide range of grounds (including socio-economic status), encompasses both formal and substantive discrimination (para.8). It says the following: (a) Formal discrimination: Eliminating formal discrimination requires ensuring that a State's constitution, laws and policy documents do not discriminate on prohibited grounds...(b) Substantive discrimination: [...] The effective enjoyment of [...] rights is often influenced by whether a person is a member of a group characterized by the prohibited grounds of discrimination. Eliminating discrimination in practice requires paying sufficient attention to groups of individuals which suffer historical or persistent prejudice instead of merely comparing the formal treatment of individuals in similar situations." (Blyberg and Hofbauer, 2014)

identification of the geographic spread of the most vulnerable households in South Africa as well as the spread of learners. In 2011, 16%, 23.2% and 13.8% of all learners were in the Eastern Cape, Kwazulu-Natal and Mpumalanga respectively. A further 16.5% were in Gauteng schools (DBE, 2013c). In relation to the geographic share of poverty, 26.3% of South Africa's poor were in Kwazulu-Natal, 18.3% in the Eastern Cape and 16.1% in Limpopo. Across South Africa, however, while children (0-17 year olds) constituted 37.6% of the total population, 46% of all poor people were children- almost half of the country's poor (StatsSA, 2013c). The SANHANES (2013) report revealed, however, that the highest prevalence of children exhibiting signs of under nutrition (stunting, wasting and underweight) was evident in rural, informal settlements and particularly in the North West, Free State and Northern Cape.

Figure 3: Percentage of Learners Benefitting from the SNP 2009 - 2013 (Source: StatsSA, 2012 and StatsSA, 2013)



According to StatSA, between 2009 and 2013, that national percentage of learners that reported being fed at school rose from 65.6% to 74.5%. The general increases from year to year (albeit sometimes marginal) may have some correlation with the general decreases in all children's reports of experiencing hunger over a similar period (15.9% in 2010 and 13.1% in 2012) as reflected in Figure 1. While it is understood that the DBE itself uses StatsSA data for this indicator, its accuracy for NSNP indicators is questionable. Not all school feeding programme are necessarily under the auspices of the DBE/NSNP. Amongst various entities that operate feeding schemes at schools that may or may not be supplementary to the NSNP are food chains and NGOs. It is recommended, therefore, that the DBE undertake rigorous data collection against this indicator to generate accurate information around the number of learners that are actually fed on the NSNP at schools.

It is unclear how the DBE determines coverage of all learners in need of NSNP interventions and whether or not any obstacles to learners accessing food have been taken into consideration. A pilot study carried out by the Accountability and Transparency for Human Rights (AT4HR) Foundation assisted by the PSAM concluded that while the South African government makes a fair amount of information publicly available explaining the design of child nutrition interventions; potential obstacles to accessing interventions such as the NSNP and Vitamin A supplementation for infants are

not adequately acknowledged. The study determined that improvements must be made in the way that such interventions are designed and in the publicising of the data informing their targets¹⁰.

The StatSA data still remains valuable if possibly overstated. As evidenced in Figure 3, the Western Cape is the only province in which the percentage of learners reported to be receiving food from the NSNP has steadily decreased between 2009 and 2012 (from 57.7% in 2009 to 48.2% in 2012). The Western Cape and Gauteng represent provinces with lowest overall percentages of learners reported to be benefitting from the programme. In addition to determining the total numbers of learners in the lowest quintiles by province, information relating to where these learners are would be useful in determining the reach of the programme and must be made uniformly available by all provincial education departments as well as by the DBE.

As outlined in Table 1; Kwazulu-Natal is allocated the largest budget share for the NSNP conditional grant. Despite this, however, it is noteworthy that in 2013 this province had amongst the lowest percentages of learners supported by the programme at 76.9%; with only two other provinces feeding lower percentages of learners; the Western Cape and Gauteng (Figure 3).

Figure 4: Malnutrition amongst select children's age groups in South Africa; 2005 and 2012

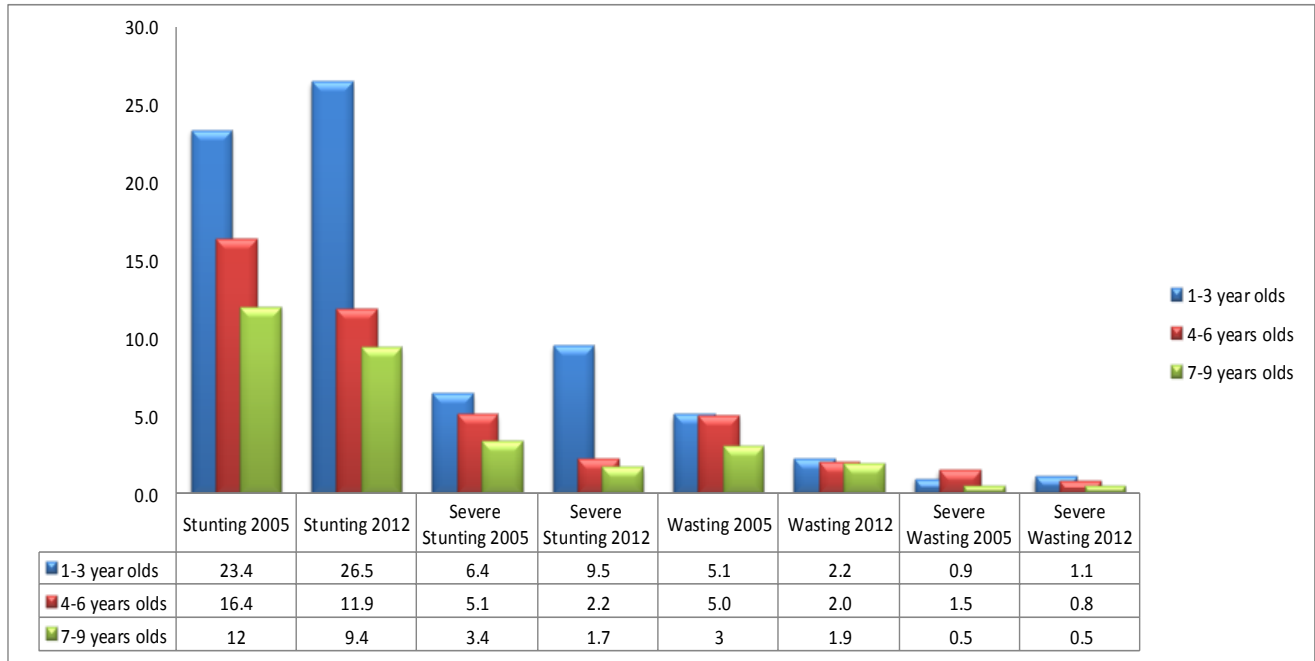


Figure 4 is an outline of the key components of under nutrition (stunting, severe stunting, wasting and severe wasting). The figure compares data collected for the selected age groups in 2005 and 2012 (SANHANES, 2013). In several of these categories, 1-3 year olds exhibit the highest percentages. Particularly noteworthy are the figures for stunting and severe stunting in 2005 and 2012; the youngest children display notably higher degrees of stunting and severe stunting. Of greater concern is the clear increase between 2005 and 2012 in all categories for 1-3 years olds with the exception of wasting which decreased from 5.1% to 2.2%. It is, however, encouraging that for the each of the other age categories, there were decreases in stunting and wasting. Severe wasting for the 7-9 year old cohort remained at 0.5%.

¹⁰ Accountability and Transparency for Human Rights (AT4HR) Foundation, International Budget Partnership (IBP) and Save the Children. April 2013. *Budget Transparency and Child Nutrition: Research Findings From: Kenya, South Africa, Uganda, Zambia and Zimbabwe*. Available Online: www.at4hr.org.

While the 1-3 years old cohort is not, strictly speaking, catered for within the public school system and is thus not within the custodianship of the DBE, the shared responsibility across government departments should be emphasised. Learners between the ages of 4 and 6 are accommodated either within Public School Grade R or in Grade 1. For these learners, the levels of stunting (11.9%) in 2012 are a source of concern. As a general question relating to nutrition interventions targeted at children; the Departments of Health and Social Development are primarily accountable for the youngest cohort and, as such, scrutiny must be placed on the effectiveness of such programmes.

In an expenditure tracking report published by the PSAM in November 2013, it was noted that the ECDoE had committed to extending the reach of the provincial school nutrition programme to cater for ECD learners¹¹. It was also noted, however, that while some of these learners would be in community-based centres, there seemed to be limited integration between the DBE and DSD regarding planning and budget implementation provincially. The DSD in the Eastern Cape is the primary caretaker for learners in the ECD sector; particularly those within community-based ECD centres. The need for greater interdepartmental integration is evident and both provincial and national level. One such area where integration is sorely lacking is between the DBE, DSD, DoH and DoA where sustainable food production to support the NSNP is concerned.

Sustainable production and provisioning of food is one aspect of the NSNP that has not been achieved to date and is also not clearly articulated in DBE and provincial planning documents. This is despite the emphasis placed on sustainable food production as a programme objective. Amongst the objectives of the NSNP is to promote self-supporting school food gardens and other food production initiatives and to promote healthy lifestyles amongst learners (DoE, 2009). According to an Annual Report of the National School Nutrition Programme, such food production is prioritised in the NSNP within the Sustainable Food Production in Schools (SFPS) programme (DBE, 2011). Under this programme; tree planting and vegetable cultivation are planned. In the Eastern Cape, a plan for the NSNP in relation to food production is mentioned in a cursory manner as part of garden cultivation for school beautification in which a targeted 100 schools are to participate in 2013. Activities include planting vegetable gardens in addition to flowers, trees and toilet disinfecting.¹² On a national scale, the 2010/11 Annual Report states the need to foster food production at schools and that “...*although schools had vegetable gardens, these were largely non-productive. The majority of schools lack capacity to maintain gardens*”. In the entire country, only two vegetable gardens (tunnels) were established; one in the Free State province and one in Gauteng (DBE, 2011).

The approach to sustainable food production is largely superficial. The Department remains significantly dependent on the existence of the conditional grant to support food security initiatives in schools and offers little by way of programme support and skills development. This, in the case of several provincial departments is misaligned with the objective of ensuring that schools are supported communities mobilisation. Engaging small scale farmers, local agriculture co-operatives, technical colleges and local food distributors must be central. It is recommended that, in addition to regular monitoring and evaluation of the NSNP, that the DBE must use existing mechanisms within the IFSS/nutrition and food security strategy to foster real cooperation between the various implementing departments. Currently, the sustainability of the NSNP as a source of learning and food security for vulnerable learners is weak.

¹¹ Eastern Cape Department of Education, *Annual Report 2012/13*, p.29.

¹² Province of the Eastern Cape Department of Education *Annual Performance Plan 2012/13*. (Refer to Performance Indicator 154 under Strategic Goal 5).

b) EFFECTIVENESS¹³ OF THE NSNP IN BUDGETING TERMS

Financial Record Keeping at District and School Level

A pre-requisite for effective NSNP budgeting is the use of accurate, up-to date learner enrolment numbers. This information is collected from EMIS. Overy (2010), found that accurately determining learner numbers in the ECDoE, for example, was difficult partly as a result of severe staff shortages within the EMIS unit responsible for collecting and updating data. A UNICEF study revealed that financial mismanagement had crippled the functioning of the programme across the Eastern Cape and as a result of ongoing investigations, financial statements were not available to the research team. Research carried out in later years in the Grahamstown district of the Eastern Cape intended to track expenditure in the NSNP from province, district and school was hindered by similar problems. Overy (2010) reported that an accurate expenditure tracking survey would not be feasible in the absence of accurate food delivery reports from school and supplier contracts and payment details from the ECDoE. It is vital to note that attempts have been made to resolve some of these problems. In the Eastern Cape, for example, the provincial NSNP was decentralised soon after the above mentioned findings were made and presented to ECDoE senior staff and to the Provincial Research Committee of the Office of the Eastern Cape Premier.

VI. CONCLUSION AND SUGGESTIONS FOR FURTHER WORK

The South African National School Nutrition Programme has undoubtedly contributed to addressing the nutritional needs of the most vulnerable South African learners. This is especially worth consideration in light of the fact that many learners reportedly receive their main (and sometimes sole) meal of the day at school. The progressive policy and school funding mechanisms introduced by the government after 1994 have had a fundamental impact not only on access to education but to addressing other aspects of social justice. The public school system has certainly changed for the better for the majority of previously oppressed South Africans. It is clear, however, that much more remains to be done especially by way of sustainable funding mechanisms and strategic interventions to ensure equal access to education for all.

The National School Nutrition Programme is an indubitably important intervention within the South African Education system. While its explicit benefits in terms of maintaining high learner enrolments, decreasing dropout rates and generally enhancing learners' academic performance have not been definitively studied or reported on; anecdotal evidence reflects that the NSNP has had significant impacts in these areas. At the very least is the acknowledgement that for many learners whose primary daily meal comes from school; a little food is better than none at all. There is a need, however, for an in-depth analysis of the nutritional quality and overall impacts of the NSNP. As this case study has shown; the DBE must make a concerted effort to ensure the monitoring and evaluation of the programme is undertaken regularly and rigorously to allow for this. While this report did not explore the effects of corruption and maladministration; this is an area that deserves in-depth research in addition to ongoing monitoring and evaluation.

¹³ The issue of 'effectiveness' explores the effectiveness of expenditure and the extent to which the results constitute tangible improvements in the right to access adequate food. Budget effectiveness is also an exploration of the extent to which programme targets are met. An important consideration in determining the effectiveness of expenditure in relation to the NSNP is whether or there is adequate information available to evaluate budget effectiveness as well as the degree to which programme monitoring and evaluation exists.

This programme continues to be amongst the largest conditional grants across the key social spending sectors of the South African government. It is also arguably one programme where marked improvements on expenditure and performance can be highlighted in several provinces. The NSNP also has immense potential for providing forms of employment and skills development in food supply and preparation.

Despite these improvements over time and great potential; the NSNP requires a strategic review given the concerns raised in this report. The reach of the programme in its selective extension to some learners in need and not all as well as to 'some' learners in special schools as well as an unclear number of learners targeted and reached in ECD constitutes a challenge to the degree to which the programme is effectively and equitably targeted.

It is also important to consider the implication of the budget gaps for children in Early Childhood Development centres and special schools. Currently- the apparent lack of uniformity in programme reach for these learners presents a challenge that the DBE must, in collaboration with all departments complicit in rolling out the national anti-poverty strategy, Nutrition Roadmap and the Food and Nutrition Security policy, seek to address.

A major policy component of the NSNP is the cultivation of fresh produce from which to supplement the school food menu. This as an indicator is poorly and/or haphazardly reported against. Currently- anecdotal evidence indicates that school food gardens are not uniformly used as educational tools within schools nor is there a sustained effort across provinces to provide strategic intersectoral support between department such as DAFF, DoH and DBE to ensure programme success. The NSNP has the potential to play a significant role in empowering the communities within which schools exist- rural and peri-urban in particular- in providing a market for locally produced fresh produce. If the programme were to function as it was originally intended within the Integrated Food Security Strategy

In conclusion– South Africa's National School Nutrition Programme is undoubtedly a vital intervention in the lives of many vulnerable school children. The programme must therefore be further supported to improve on its mandate through a critical review of its budget allocations and performance across the provinces. Given the current budget limitations- there may be scope to create partnerships with research entities as well as the StatsSA for this purpose. Accurate, ongoing data collection activities aimed at supporting the NSNP can also be undertaken by institutions of higher learning with whom the DBE has partnerships. While the food and nutrition security policy constitutes a broad framework, its guiding principles must seek to strategically influence key interventions in a direct, explicit manner. The following recommendations are therefore made with respect to the responsibility areas of the DBE, National Treasury and DAFF in particular;

Recommendation 1: Review Effectiveness of the Quintile System in Supporting all Food Insecure Learners

Recommendation 2: Assess Provisioning on the Right to Adequate Food for Learners in Quintile 4 and 5 Schools (related to Recommendation 1)

Recommendation 3: Establish Rigorous Provincial and District Monitoring Systems for Tracking Expenditure and Programme Implementation

Recommendation 4: Treasury and the DBE Must Set Corrective and/or Punitive Measures for Departments that consistently Under Spend and/or Feed Irregularly on their NSNP Conditional Grant Allocation

Recommendation 5: The South African Government Must Bolster Inter-Departmental Collaboration for Sustainable Food Production to Support the NSNP through the improved Implementation of the Integrated Food Security Strategy

Recommendation 6: The DBE must administer rigorous statistical data collection relating to NSNP indicators to inform planning and budgeting


VII. APPENDIX

Table 3 below outlines the estimates and expenditure in real terms for the School Nutrition Programme for all provincial education departments and the DBE between 2010/11 and 2016/17.

Table 3: Real Estimates and Expenditure for the National School Nutrition Programme Conditional Grant

Province ('000 Rand)	2010/11	2011/12	2012/13	2013/14			2014/15	2015/16	2016/17	Average Growth Over MTEF	Real Change Between 2013 and 2014 (%)
Eastern Cape	867,763	995,114	1,001,559	1,007,642	1,007,642	1,007,642	984,548	1,020,116	1,074,182	2.95	-2.29
Free State	236,551	294,410	289,391	291,468	291,752	291,752	299,205	317,157	333,966	3.73	2.55
Gauteng	447,101	556,118	656,378	621,210	654,501	654,501	640,541	678,974	714,960	3.73	-2.13
Kwazulu Natal	1,065,251	1,357,424	1,292,956	1,280,506	1,280,506	1,280,506	1,237,534	1,287,034	1,355,247	3.08	-3.36
Limpopo	815,029	924,061	1,076,706	989,476	989,476	989,476	991,153	1,030,799	1,085,431	3.08	0.17
Mpumalanga	494,193	531,376	568,718	527,262	535,939	535,939	524,913	545,910	574,843	3.08	-2.06
North West	311,733	368,996	363,021	370,409	376,722	376,722	366,890	381,566	401,789	3.08	-2.61
Northern Cape	105,289	124,686	127,018	127,244	127,244	127,244	134,645	142,724	150,289	3.73	5.82
Western Cape	211,453	272,869	265,709	276,590	281,437	281,437	282,486	299,435	315,305	3.73	0.37
National	4,562,644	5,431,213	5,508,510	0	5,491,808	0	5,461,915	5,703,715	6,006,012	3.22	-0.54

Extract 1: ECDoE Circular No. 26 of 2007 Dated 05/09/07 Signed by the Superintendent General



**Province of the
EASTERN CAPE**
DEPARTMENT OF EDUCATION

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CIRCULAR NO. 26 OF 2007

TO : CHIEF FINANCIAL OFFICER
CHIEF DIRECTORS
CLUSTER CHIEF DIRECTORS
HEAD OFFICE AND DISTRICT DIRECTORS
CES – EDUCATION SUPPORT SERVICES
SNP DISTRICT COORDINATORS
PRINCIPALS OF SCHOOLS
MEMBERS OF SGB

FROM : SUPERINTENDENT GENERAL

DATE : 04 SEPTEMBER 2007

SUBJECT : REGULARIZATION OF SCHOOL NUTRITION PROGRAMME OPERATIONS

Purpose

The department notes with great concern that despite concerted efforts to normalize operation in the School Nutrition Programme, some districts and schools still continue to ignore their important role in the administration of the programme. This, they do despite reported cases of irregularities and fraud that have crippled the programme in 2006. This circular serves as a reminder on these important SNP administrative requirements that must be adhered to for the smooth running of the programme. The circular deals briefly with the following matters:

1. Reporting requirements
2. Administration of Meal Servers
3. Increased Learner Numbers on Programme from August 2007
4. Monitoring of Supplier/ Service Providers at school level
5. Sustainable Food Production Initiatives in Schools
6. Use of SNP Vehicles in districts
7. School Nutrition Programme Specimen signature forms.
8. SNP Database
9. Audit of SNP Assets

It must be further emphasized that findings of all investigations conducted on the activities of School Nutrition Programme point to the weakness of the system arising from poor performance at the levels of schools and districts with regard to the above. This circular

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790 **Extract 2: Media coverage of fraud and corruption allegations in the NSNP in Limpopo.** (Source Mail
791 and Guardian, 26 October 2012) (Extract typological errors due to incompatible text formats)

[Malema's 'list' of pals feed on school meals](#)

This was apparently after he presented a list of people he wanted to receive a cut of the money. They include two of his cousins, his part-time bodyguard and security adviser, his former driver, his former driver's girlfriend, and two of his close allies in the provincial ANC Youth League. Send us your questions about this story and watch our live video with the reporters involved. Five sources – two of them senior administrators in the provincial education department at the time – independently told the Mail and Guardian they heard Malema had handed provincial education minister Dickson...[continue reading](#)

Source: <http://mg.co.za/article/2012-10-26-00-malemas-list-of-pals-feed-on-school-meals>

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797 **Extract 3: Federation of Governing Bodies of South African Schools (FEDSAS) outlines**
798 **consequences of NSNP cuts on Gauteng learners** (Source:

799 <http://www.politicsweb.co.za/politicsweb/view/politicsweb/en/page71639/page71654?oid=739731&sn=Detail&pid=7>
800 [1616](#))

FEDSAS

Treasury cuts off funding for feeding schemes at Quintiles 4-5 schools - FEDSAS

Paul Colditz - Mrs Melanie Buys
03 October 2014

64 000 Gauteng learners from poor backgrounds, who are attending fee charging state schools, likely to be affected

Treasury's decision holds dire consequences for school feeding schemes

Some 64 000 learners in Gauteng alone who are dependent on school feeding schemes will suffer the consequences of a decision by the National Treasury not to provide money for these schemes at so-called quintile 4-5 schools.

From this month these schools - schools where additional school fees are charged - will not receive any contribution towards feeding schemes from the education department. Schools that wish to continue to provide a daily meal to disadvantaged learners will have to pay for it out of their own pocket.

"The Treasury has determined that allowances for feeding schemes will only be paid to quintile 1-3 schools," says Mrs Melanie Buys, Gauteng provincial manager of the Federation of Governing Bodies of South African Schools (FEDSAS).

"From our own environmental analysis it appears that half of FEDSAS' some 1800 member schools run feeding schemes, but that 85% of these schools already pay for it themselves. An average of 77 learners per school are assisted," says Mr Paul Colditz, CEO of FEDSAS. He says schools that will be hit hardest are those who provide the most exemption from school fees. "These school will not have the money to continue with the feeding scheme should the provincial department, as determined by the Treasury, cease to pay the allowance."

FEDSAS is urging the Treasury to reconsider this decision.

"People should not make the mistake of thinking that there are not hungry children in quintile 4-5 schools. There are talk of providing learners with tablet computers yet some of these learners are unable to concentrate in class due to hunger," says Colditz.

FEDSAS is also requesting communities to assist schools and to become involved in the needs of children in schools.

(FEDSAS is a voluntary association of school governing bodies of public schools and supports quality education in these schools. Nearly 1750 public schools are already members of FEDSAS).

Statement issued by Mr Paul Colditz, CEO: FEDSAS, Mrs Melanie Buys, Gauteng provincial manager: FEDSAS, October 3 2014

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802 **Extract 4: Hunger amongst KZN learners in quintile 4 and 5 schools** (Source: www.iol.co.za)



www.iol.co.za

'Thousands of KZN pupils are hungry'

January 31 2012 at 09:50am

By Leanne Jansen



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INDEPENDENT NEWSPAPERS The Congress of SA Trade

Unions' nationwide protest affected schools in Polokwane on Wednesday. Photo: Matthews Baloyi

Education stakeholders are again calling for the controversial quintile ranking system, which they say has resulted in thousands of KwaZulu-Natal primary school pupils going hungry over December and January, to be reviewed.

According to the system, quintile one schools are in the poorest areas and generally have inadequate resources and infrastructure.

At the other end of the scale, quintile five schools are in affluent areas and have better facilities. The lower the quintile, the more financial support a school receives.

While the National School Nutrition Programme has a dedicated budget to feed pupils in schools from quintile one to three for 12 months of the year – at R2.15 a head a day – it uses money left over from other budgets to feed children in the higher quintiles.

However, there is only enough money to do so for 10 months, meaning that children in quintiles four and five went hungry in December and January on those days when school was open.

More than 600 primary schools in quintile four and more than 400 in quintile five depend on the scheme.

On Monday stakeholders argued that even one day was too long for a child to go hungry, calling the situation “unacceptable” and “unconscionable”. They again argued that many schools were incorrectly ranked because the system failed to use the socio-economic status of a school’s population as a determining factor.

Earlier this month, the Westville Methodist Church wrote to The Mercury, appealing for food donations for the Kranskloof Primary School at KwaDabeka in the Pinetown school district. Although the school is classified quintile four – because it has electricity, running water and tarred roads leading to it – some of its pupils are orphaned and are the heads of their households.

Challenged

The church has stepped in to feed pupils, but can only do so twice a week. The school has more than 700 pupils, but in the interim only the neediest 300 are fed. It is often the only meal the children will have all day.

Reginald Chiliza, chairman of the Association of School Governing Bodies of KZN, said the quintile system should be challenged.

“There are a lot of informal settlements in KwaDabeka. For a school in that area to be ranked quintile four means that something is seriously wrong with the system,” he said.

Trevor Bennison, KZN head of the Governing Body Foundation, agreed that the system needed “reviewing”.

“Schools in certain areas have changes in their pupil populations (registering more poor pupils over the years) but are still classified as affluent schools due to physical characteristics. If a school qualifies for the feeding scheme, it should be for the whole school year. Even one day (without food) is unacceptable,” he said.

In KZN, the government’s nutrition programme provides for one hot meal a day, usually a protein such as sugar bean curry, pilchard stew or soya mince; a starch such as pap or rice; and a vegetable – except on Mondays, when fruit replaces the vegetable.

KZN Education Department spokeswoman Mbali Thusi said yesterday that while the department was aware of the problems with the system, it was a national policy that it had to follow.

She said that the national department was working on ways to remedy the situation.

A spokesman for the Department of Basic Education, Panyaza Lesufi, said that a policy document was doing the rounds among stakeholders for comment.

Last year, the department said that the quintile system would be dumped by April 2012 and replaced with two categories: fee-paying and non-fee-paying schools. - The Mercury© 1999 - 2010 Independent Online. All rights strictly reserved. Independent Online is a wholly owned subsidiary of Independent News & Media. Reliance on the information this site contains is at your own risk.

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