IN THE NORTH GAUTENG HIGH COURT (REPUBLIC OF SOUTH AFRICA)

In the matter between:	CASE NUMBER:		
in the matter between:			
SECTION27	First Applicant		
HANYANI THOMO SECONDARY SCHOOL	Second Applicant		
CONDANI LYDIA MASIPHEPHETHU	Third Applicant		
and			
MINISTER OF BASIC EDUCATION	First Respondent		
MEMBER OF THE EXECUTIVE COUNCIL:			
LIMPOPO DEPARTMENT OF EDUCATION	Second Respondent		
SUPPLEMENTARY AFFIDAVIT			
I, the undersigned			
BRONWEN JILL WILSON-THOMSO	N		
hereby state under oath:			

- I am an adult female. I am a lecturer in the Curriculum Studies Division in the Wits School of Education at the University of the Witwatersrand. I hold a Masters Degree in Education (Mathematics Education) and am currently completing my Doctorate of Philosophy in Curriculum. A copy of my curriculum vitae is attached as "BJW1".
- 2. I teach Curriculum at both undergraduate and post-graduate levels. I have conducted research in classroom practice and curriculum interpretation and implementation. I have worked in this area since 1994.
- 3. The facts contained in this affidavit are both true and correct and, unless the context indicates otherwise, within my personal knowledge. I have provided this affidavit on an urgent basis.
- 4. I have read the founding affidavit deposed to by Nikki Stein and support the submissions made in support of this application. I elaborate below on certain aspects of this application relating to the non-delivery of textbooks to schools.
- 5. It is widely acknowledged that a major shortfall of previous curricula was that there was inconsistency in the use of textbooks. Research has shown that learning is dependent on teacher interpretation and transmission of content and must, in order to be effective, be supplemented by textbooks. It is for this reason that Curriculum and Assessment Policy Statements (CAPS) has had a strong emphasis on the use of textbooks.
- Where the context is such that teachers have inadequate content knowledge textbooks are essential for both teachers and learners to develop and deepen that content knowledge.
- 7. I am aware that the schools represented in this application have not received textbooks, particularly for the new CAPS curriculum in Grades R, 1, 2, 3 and 10. The impact on the learners in the Foundation Phase is serious in that the foundations of literacy and numeracy underpin all of their school learning and jeopardise their potential for learning in higher grades.

- 8. For the higher grades, content knowledge is of greater significance. This is especially where teachers' content knowledge has been identified as a central factor in the underperformance of learners. I have read the reports referred to in the founding affidavit in which this fact is confirmed.
- 9. Due to the lengthy delay in textbook delivery the foundational knowledge for numeracy and literacy are unlikely to have been established and so the learners are unlikely to achieve the necessary assessment standards by the end of Grade One.
- 10. Textbooks and reading matter are an essential component of literacy especially where learners do not have access to books outside of school. They are also an essential component of the foundation of numeracy, and assist both learners and their parents in consolidating knowledge. In my experience, parents rely extensively on textbooks to assist their children with their homework.
- 11. I have noted that the Department of Basic Education ("DBE") has undertaken to provide learning and teaching support materials by mid-June 2012 at the latest. In my view this is extremely late and will prejudice the learners' chances of success in reaching learning goals. In my direct teaching experience and my research I have found that assessments dominate the second half of the academic year. As a result teaching time is compromised and the first half of the year is a crucial time of teaching and learning.
- 12. For the learners in the Foundation Phase, the process of literacy and numeracy requires an even and responsive pace of teaching and systematic concept development. For these learners the time and the opportunities to learn that have been lost in that time cannot be recovered at this level in the remaining six months. The burden of catching up on lost opportunities is heavier in larger class sizes, i.e. above 30 to 35 learners.
- 13. In respect of the Grade 10 learners the situation is different and lost opportunities may still be recovered. The learners are older and are more likely to cope with an intensification of teaching. At this stage the learners are more able to work

independently and are more goal-orientated. Grade 10 is the beginning of the Further Education and Training phase (FET) and important foundational knowledge must be layed. If the DBE is committed to ensuring that the learners are able to meet the necessary standards by the end of the year, it is imperative that the DBE puts in place a high quality 'catch-up' plan.

- 14. It would not be the first time that the DBE has implemented a catch-up plan for lost learning time. For example, following the 2010 public service strikes and the 2010 FIFA World Cup, catch-up camps and additional weekend classes were offered.
- 15. The Minister of Basic Education, in the attached statement marked **"BJW2"** stated the following:

This momentous event, the 2010 FIFA World Cup, was not a disruption. We knew it was coming. We had planned for it, and this is what motivated our schools, teachers, learners, parents and school governing bodies to go the extra mile.

Disruptions caused by the teachers' strike introduced another dimension. They made people work even more harder. Intensive study camps were organised and post-strike recovery plans were initiated. It was indeed business unusual.

. . .

I am pleased to announce that the national pass rate for the class of 2010 is 67.8%. It represents an impressive increase of a whopping 7.2% on the 2009 results (60.6%), just 2.8% short of 10%.

- 16. It is clear from this statement that the catch-up plan implemented by the DBE contributed to learner success.
- 17. It is not only reasonable for the DBE to develop a catch-up plan in these circumstances but a duty that rests on the DBE. This is especially so given that the delay is of the DBE's

making. The consequences of their failure should not be left at the feet of the learners. This case is a prime example of the gap between policy and implementation. There is a plethora of good policy in education but the implementation remains weak.

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