



6 October 2014

Mr Allan Subban, Director : LTSM
For Attention: Mr S Sibiya
Department of Basic Education
Private Bag X895
PRETORIA
0001

E-mail: ltsmdraftpolicy@dbe.gov.za

Dear Mr Subban

**RE: DRAFT NATIONAL POLICY FOR THE PROVISION AND MANAGEMENT OF
LEARNING AND TEACHING SUPPORT MATERIAL (LTSM)**

Please receive herewith the comments of the S A Booksellers Association of South Africa (SABA) on the draft National Policy for the Provision and Management of Learning and Teaching Support material.

SABA is in agreement with the stipulations contained within the Draft LTSM Policy that:

- *The **supply**, usage and retention of LTSM must be a **collaborative effort by all stakeholders** (p.9 – point 5)*
- *The standards of education **provision, delivery and performance** are monitored (page 9 – point 6)*
- *Co-ordination is provided in the **procurement, production and distribution** of LTSM (p.10 – 7.1.(iii))*

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

- *LTSM shall be procured allowing for participation by **other stakeholders** (booksellers) (p.11 (ix))*

In view of the above, SABA wishes to substantiate the following facts:

- SABA has 113 members (which excludes the branches of the various entities) and who employees in excess of 2 600 people. These employees are knowledgeable and can render advice on choosing textbooks as well as other resource material. SABA welcomes and assists emerging booksellers, enabling them to develop their skills.
- Booksellers form an integral part in the value chain assisting with the delivery of Education to all communities in all countries all over the world
- SABA members are continuously involved in the process of educational book procurement and are of value to Education Departments, teachers and learners because they ensure informed choices are made with regards to LTSM.
- In a bookshop one finds a wide range of books representing the best output from a number of publishers. Teachers can find books to supplement the texts provided and learners and parents buy good literature and reference materials to build on what is taught in the classroom. Bookshops play a part in educating our young people.
- In terms of distribution, LTSM are picked, packed and delivered timeously and cost effectively. (Typical examples are the Eastern Cape and North West Provinces). Provinces such as the Eastern Cape and KwaZulu Natal are vast with schools situated in rural areas, which are in many instances almost inaccessible. Booksellers continue to serve such areas with dedication.
- Where Booksellers are permitted to participate in the process of procurement, they are in direct contact with schools to ensure stock availability, competitive pricing and timeous delivery, which saves the Department of Education additional costs and the frustration of obtaining quotations, dealing with incorrect deliveries, returns, picking, packing, packaging, incorrect invoicing and delivery costs. They also provide services such as online ordering, teacher and student support, etc.
- In addition to the delivery of core LTSM, booksellers liaise with suppliers of other essentials and help with the delivery of stationery and other consumables and with the successful installation of Science, Technology, Mathematics, Biology apparatus and electronic equipment such as tablets.
- SABA also promotes a culture of reading and writing at our schools and beyond. Members arrange book displays and readings at schools and liaise with Publishers for donations of library material for school libraries - for example on World Book Day and other auspicious occasions. (E.g. Youth Day). They participate in school upliftment programmes, as well as fundraising for events such as reading and writing competitions and prize-giving ceremonies.

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

We appeal strongly to DBE to permit schools that are capable, to procure books – both core and supplementary – from SABA members of their choice (*p.18 – point 7.8.1*). SABA members are required to comply with a Code of Ethics. Schools have built long standing relationships with their booksellers and know that they can trust their preferred bookseller to execute orders, expedite deliveries and render after sales service.

Compelling all schools to purchase on the proposed centralised model will quickly destroy all stock holding educational bookshops in our country as they will have very few customers. Using a number of independent booksellers to service at least a part of your requirements will prevent significant job losses and will confirm Government's commitment to economic growth by advancing the development of Small, Medium and Micro Enterprises and historically disadvantaged individuals – an aim articulated on page 16 of your draft proposal.

With reference to the Two Tier Procurement Model (p.17 – point 7.8), there appears to be some uncertainty with regards to the implementation of a centralised versus decentralised procurement model. From what SABA understands, both models will be implemented and run at the same time.

Clause 7.8 refers to a centralised procurement model

In clause 7.8.1 (p.18) it is stipulated that the **centralised procurement model** will apply to **ALL** public schools and will be for the procurement of **core LTSM** and other essential LTSM such as Science apparatus, whilst the **decentralised procurement model** will allow schools to purchase **supplementary material** individually, using retailers of their choice.

Clause 7.8.2 stipulates that the **decentralised procurement model** will be adopted for the procurement of **supplementary LTSM by Section 21.1.c schools** at school level.

In clause 7.8.1 (vi) – the last paragraph – (p.20) stipulates: “*This model may also be used by provinces for the procurement and distribution of **certain categories of supplementary LTSM** “, so removing the only area of procurement clearly left for independent retailers.*

SABA would suggest that the above procurement models be defined more clearly.

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

After considering the two proposed procurement models, we believe SABA members can continue to serve the Department of Education in various ways:

- Booksellers can **assist with the centralised procurement model** in which provinces or the DBE procure Core and other essential LTSM such as Science, Technology, Mathematics, Biology Apparatus, particularly in view of the suggested Provincial, as well as individual school LTSM Committees. SABA can share their expertise to assist with LTSM Procurement and Distribution Plans (page 18)
- Whilst clarity/confirmation is still required in terms of the **Two Tier Procurement Model**, SABA members are certainly in a position to assist with a **decentralised procurement model** which allows for school-level procurement of **supplementary** LTSM for Section 21.1.c. schools based on the preference of an individual school and managed by the school's LTSM Committee. Once again may we re-iterate that schools have built long lasting, trusted relationships with their preferred bookseller(s) over the years.
- On page 19 the Draft Policy states under the heading 'Ordering' – 'The consolidated orders will be placed with publishers/**suppliers** or delivered by the state'. Booksellers are specialist suppliers who are worthy of your support and we request that a mechanism for distribution of part of your orders through booksellers be devised.

SABA members are widely distributed and have the infrastructure, manpower and expertise to consistently deliver material on time, in the most cost effective manner to all schools throughout South Africa. Utilising state delivery will result in an extra burden on Government funds and it is doubtful whether timeous delivery and value added services will be achieved.

- In terms of Receiving, SABA members can assist in ensuring deliveries are checked against requisitions as correct with the authorised official(s) at the schools, that the POD's are certified and returned directly to the relevant Provincial Education Department when they are doing the supply.
- SABA supports and will encourage the spend of 30% of a schools Norms & Standards budget allocated to Library resources. Bookshops offer to assist in the choice of library materials through finding a wide variety of relevant books, arranging displays and supplying in ways convenient to the DBE.

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

- SABA will ensure continued after sales service excellence. Face to face personal service remains key when satisfying the needs of educators through the year.
- Utilising SABA booksellers will eliminate corruption. SABA has a Code of Ethics which all its members subscribe to. Where SABA members are your supply partners, SABA will organise screening jointly with the DBE and we suggest that non-compliance should lead to immediate black listing and suspension from the DBE and SABA suppliers lists.
- SABA members have knowledge of all Publishers' textbooks and additional resources and assist teachers to make informed choices suitable to their students' needs.
- SABA can assist and advise schools and Education Departments on LTSM Retention and retrieval, simultaneously instilling a sense of responsibility and clarifying the accountability for LTSM retention among teachers and school management.
- SABA can supply the minimum school bag requirements. (Page 9 – Clause 5 and stationery (Page 3 – Glossary) and Page 6 (Introduction) at a competitive price.
- SABA can assist with the procurement, delivery and utilisation model with regards to the provision of e-books, by making Publishers' e-books available on SABA members' online stores.

Regarding the proposal that '*each catalogue will list one book per subject per grade per language*', SABA wishes to draw your attention to a study conducted worldwide on a single textbook environment and we quote:

- *Sole source supply, unless professionally supervised, provides opportunities for corruption because large sums of money are available on the basis of a single national decision.*

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

- *On balance, there are considerable advantages to a choice of textbooks over a single monopoly textbook, simply because it is extremely unlikely that a single textbook can meet the requirements of widely differing schools in the same country. A textbook which suits the needs of a well-funded, well-resourced, well-equipped urban school with relatively small classes, well-qualified teachers and good furniture which can easily be moved to support group work and pair work situations, will not easily fulfil the needs of an overcrowded, under-resourced rural classroom with untrained teachers where many students will be sitting on the ground and where desks and benches are at a premium and are not easily manipulated into different learning configurations. Multiple textbook choice can provide something for each of these extreme situations, which is not available in single choice textbook environments.*
- *Also, there is evidence that schools have greater ownership of textbooks that they choose themselves. Finally in multiple choice situations, competitive pressures tend to force Publishers to upgrade their textbooks to meet the standards set by rival publications and also to compete actively on price.*
- *In its simplest form centralised supply is associated with monopoly textbook provision systems (either commercial or state) and is based upon a central authority deciding how many titles and copies each school in the country requires. It is impossible for a centralised authority to know the current supply situation in every school in the country and thus centralised supply tends to be characterised by considerable inaccuracy and waste of scarce resources. Many EMIS systems attempt to collect data on school textbook stocks, but practical experience suggests that the data are rarely accurate and are open to considerable interpretation. Also, the cost and management stress of maintaining individual school stock records can be high.*
- *As a general rule, decentralised ordering by individual schools tends to be a more accurate reflection of school needs and to be less wasteful of scarce resources than in centralised systems. Decentralised ordering and supply requires accountable distribution systems where the distributors are paid on proven successful delivery.*

Reference:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67621/lrng-tch-mats-pol-prac-prov.pdf

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com

To conclude we wish to extend our gratitude once again for addressing SABA at the recent SA Booksellers Association's AGM in Umhlanga Rocks, as well as your words of support. We recall the words:

- *There is a role to play by booksellers*
- *Booksellers are able to get to the deep rural schools*
- *Focus areas of SABA should be to support Government, collect statistics and work with publishers*
- *Booksellers do have a role at central procurement*
- *It is not the end of the book but there are chapters that will be closed.*

With reference to the last sentence: '*there are chapters that will be closed*' – SABA is confident that, with DBE's appreciation of our role, educational booksellers will not be one of those chapters.

May these comments submitted by SABA be received in the same light as intended – one of on-going commitment to a transparent, transformational education system, where SABA can continue to serve the DBE and contribute to the enrichment and upliftment of our future, by supporting our Educators and Learners.

SYDWELL MOLOSI
PRESIDENT : SOUTH AFRICAN BOOKSELLER'S ASSOCIATION (SABA)

South Africa Booksellers Association (SABA) | WJ Louw Building, No 7 Old Paarl Road, Bellville, 7530

Telephone Number: +27 (0)21 945 1572 | Fax Number: +27 (0)21 945 2169 |

Email: saba@sabooksellers.com | www.sabooksellers.com