IMPLEMENTATION EVALUATION OF THE NATIONAL LEARNER TRANSPORT PROGRAMME

1-5-25 REPORT

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THE IMPLEMENTATION EVALUATION OF THE NATIONAL LEARNER TRANSPORT PROGRAMME – FINAL 1-5-25 REPORT

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List of Abbreviations

CAPI	Computer-Aided Personal Interview
CATI	Computer-Aided Telephone Interview
СВА	Cost-Benefit Analysis
CE Analysis	Cost-effectiveness Analysis
CR	Central Region
CU Analysis	Cost-Utility Analysis
DBE	Department of Basic Education
DOE	Department of Education (provincial)
DOT	Department of Transport
DP	Data Processing
DPME	Department of Planning, Monitoring and Evaluation
DSD	Department of Social Development
EC	Eastern Cape
ESC	Evaluation Steering Committee
FS	Free State
GP	Gauteng
IPA	Importance Performance Analysis
KZN	KwaZulu-Natal
LIM	Limpopo
LTP	Learner Transport Programme
MP	Mpumalanga
NC	Northern Cape
NGO	Non-Governmental Organisation
NIDC	National Interdepartmental Committee
NW	North West
QRS	Quest Research Services (Pty) Ltd
SA	South Africa
SLA	Service Level Agreement
SROI	Social Return on Investment
тос	Theory of Change
ToR	Terms of Reference
TWG	Technical Working Group
USA	United States of America
VFM	Value For Money
WC	Western Cape

Policy Summary (1)

The National Learner Transport Programme (LTP) was developed by Government with the aim of addressing the challenges faced by learners who live relatively far from the nearest school and/or experience risks to their personal safety when travelling to and from school. The purpose of this evaluation is to assess the implementation of the DOT/DBE LTP, with specific reference to the current patterns of its operational performance, results (delivery) and immediate outcomes. Performance is assessed relative to the original programme goal(s), objectives and intended outcomes.

The Learner Transport Programme was in existence and had been implemented in several provinces prior to the introduction of the approved National Learner Transport Policy (NLTP) in 2015. The background to this can be traced to the Department of Transport (DOT) in the early 1990s, which had its own broader framework – including special needs transport.

The right to basic education is embedded in the Constitution of the Republic of South Africa (1996). To ensure the realisation of this right, learners must be able to get to and from school. However, the ability of many learners to access education is hampered by long distances to the nearest local schools, resulting in significant walking or travelling time and threats to their safety along the routes followed, as well as the high cost of public transport. In some cases, learners do not attend school regularly.

The following are the legislative imperatives underlying the implementation of the Learner Transport Programme:

- (1) Section 85(2)(b) of the Constitution mandates the DOT to develop and implement transport policy.
- (2) The National Development Plan (NDP) 2030 has prioritised investment in public transport, of which learner transport is a key component. The NDP has further called for investment to ensure safe, reliable and affordable public transport.
- (3) The National Policy for the Equitable Provision of an Enabling School Physical Teaching and Learning Environment (2010).
- (4) The provision of learner transport is in alignment with the Medium Term Strategic Framework (MTSF) 2014–2019 which seeks to support on-going efforts by Government to address the socioeconomic development of the country through standardised implementation plans.
- (5) The National Land Transport Act (NLTA) 2009 stipulates that learner transport provincial strategies and local government plans must be approved by the MEC and submitted to the DOT at specified times.
- (6) The National Learner Transport Policy (2015) aims to provide national principles, requirements, guidelines, frameworks, and national norms and standards which must be applied uniformly in the different provinces.
- (7) Section 3 of the South African Schools Act (SASA) 1996 makes provision for a compulsory general education phase for learners from the age of seven until the age of 15 or Grade 9, whichever occurs first. Members of the Provincial Executive Committee (MECs) are responsible for ensuring

that there are sufficient school places so that every child of eligible age can attend school and receive compulsory general education and training.

- (8) The learner transport function has been in place for more than a decade, and provides for the provision of subsidised transport to learners who walk more than five kilometres. The National Learner Transport Policy (2015) section 3.3.1 outlines the following criteria for subsidised learner transport services:
 - (a) Learners from Grade R to Grade 12, with primary schools given priority over secondary schools.
 - (b) Learner transport is subsidised to the nearest appropriate school only and not to a school of the parents' choice.
 - (c) Learners with disabilities are given priority.
- (9) The IGFRA (Act No. 13 of 2005) provides the basis for all spheres of Government to facilitate coordination in the implementation of policy, including the provision of services, the monitoring of policy implementation and the realisation of national priorities.

After initial work during 2007–2008, in February 2009 the Final Draft National Scholar Transport Policy was released by the Minister of Transport, J Radebe. The draft policy was firmly positioned in the post-Apartheid era and made reference to various studies, such as the Department of Education (DOE) study to analyse the impact of walking long distances to school on learning, and several other South African studies, including those conducted by the DOT (2003 National Household Travel Survey/NHTS), the DOE (2006 Review of the Financing, Resourcing and Costs of Education in Public Schools), the Nelson Mandela Foundation (2005) and the Human Rights Commission (1998) — which together have provided valuable information on how the distances that learners have to travel to school constitute one of the key barriers to their accessing education. The studies suggested that the ability of scholars to access education was hampered by the long distances involved, threats to their safety and the cost of scholar transport. Scholars had particular difficulty accessing educational institutions because of the unavailability of scholar transport.

The General Household Survey 2010: FOCUS ON SCHOOLING¹ (GHS, 2010) provided the empirical research for the draft policy (2015). The survey was conducted by Statistics South Africa (StatsSA) among around 22,000 households in South Africa and was specifically designed to measure various aspects of the households' living conditions, with a focus on schooling. Key points from the GHS 2010 reflected in the policy were: the draft *Minimum Uniform Norms and Standards for School Infrastructure* (DOE, 2008) stipulates norms and standards for the building of schools. Upon full implementation of the *draft* norms, every school will be required to have a catchment area with a radius of up to 3 km. The total walking distance to and from school will be limited to 6 km. According to the norms, learners who reside beyond the set catchment area will be provided either with transport or

been in circulation in 2009, but released in 2010 by StatsSA. In any event, the StatsSA 2003 NHTS is too far back to be useful as background in this 2018 evaluation.

¹ The source and reference are confusing. The original source is: DOT (2009:11) Final Draft Scholar Transport Policy, which refers to the National Household Travel Survey 2009, typically undertaken by Statistics South Africa. But there is no NHTS 2009! The NHTS 2003 was the last national travel survey undertaken by StatsSA, but in 2010 there was a General Household Survey (GHS) 2010: Focus on Schooling. This evaluation report assumes that the Final Draft Scholar Transport Policy must be referring to a preliminary report that may have

hostel accommodation according to a progressive phased and pro-poor sequence. The GHS indicated that of the 11 million who walk to school, over 300,000 (3%) walk for more than an hour to get there.²

The National Learner Transport Policy (2015) is based on the Final Draft Scholar Transport Policy (2009), with relatively few changes evident between the two documents. An important change between the 2009 draft policy and the approved 2015 policy is that the target group definition is vague in the latter version:

- (10) The scholar transport function will be provided on the basis of a number of principles, including that scholar transport must be affordable, safe and secure. The target group of the Policy is scholars who attend schooling between Grade R to 12 and live more than 3 km from the nearest school (own emphasis).³
- (11) The target group for subsidised transport is learners who attend Grade R to 12 and live in areas where they do not have access to public transport services and have to **walk long distances to school** (own emphasis).⁴

Other important changes evident between the versions of the LTP (2009, 2015) relate to the **removal** of the following in the final approved LTP (2015):

- (12) Guidelines for developmental programmes for Broad Based Black Economic Empowerment (BBBEE) and Small, Medium and Micro Enterprises (SMMEs) in order to bring the previously marginalised groups into the formalised transport sector and economic mainstream.⁵
- (13) Policy detail that there should be ... the migration of the scholar transport function to the DOT.
- (14) The recommendation that scholar transport provision should be managed by dedicated units at both national and provincial levels of government ... has been removed in the approved policy (2015), which reflects the essence of the very lengthy (and unacceptable – own insert) delays in its finalisation process of some eight years!

According to the StatsSA (2016:30) GHS, there is a slow decline in the percentage of learners (7–18 years) who walk to school. The majority of learners reported that they walk to school, but as learners get older they are more likely to walk for more than 30 minutes to educational institutions. In 2016, around 5.4% of learners travelled to school by minibus taxi, whereas 9.7% of learners travelled to school in a vehicle hired by a group of parents. The majority of individuals aged 5–18 years who reported that they walk to their educational institutions, walk for less than 15 minutes, while less than 3% of households reported that learners travel to school by minibus or in a bus provided by the school or the government.

KwaZulu-Natal has the highest percentage of learners, and the Western Cape has the lowest percentage of learners, who walk for more than 30 minutes to educational institutions.

⁴ DOT (2015:8).

² StatsSA (2010:26) General Household Survey (GHS) 2010. StatsSA: Pretoria.

³ DOT (2009:7).

⁵ DOT (2009:8).

Table 1. Proportions of 7 to 18 year olds who use different modes of transport, 2009-2016

Means of transport	2009	2010	2011	2012	2013	2014	2015	2016
Walking	74.9%	73.6%	74.1%	71.8%	72.3%	71.3%	69.0%	68.9%

Source: Statistics South Africa, General Household Survey (GHS)

In terms of the policy contribution, the National Learner Transport Programme was assessed as follows:

- 1. **Programme Relevance:** The National Learner Transport Programme is relevant in terms of the fundamental policy cornerstones: the National Development Plan (NDP) and the Medium Term Strategic Framework (MTSF). The Programme is contributing to Outcome 1: Improved quality of basic education, Outcome 3: All people in South Africa are and feel safe, Outcome 4: Decent employment through inclusive growth, Outcome 5: A skilled and capable workforce to support inclusive growth, and Outcome 6: An efficient, competitive and responsive economic infrastructure network. Furthermore, the pro-poor nature and focus of the LTP are aligned to national priorities, which also aim to purposefully alleviate the economic and social ills of vulnerable and rural communities and reduce the inequality gap.
- 2. **Policy Alignment:** At its base, there is policy alignment of the Programme with the Basic Education and Transport sector mandates, with key policy references as follows: The Constitution of the Republic of South Africa, 1996, Section 85(2)(b) mandates the DOT with the role of developing and implementing transport policy. This Learner Transport Policy is guided by the White Paper on National Transport Policy (1996), the National Land Transport Act, Act 05 of 2009, the National Land Transport Strategic Framework, the Public Transport Strategy and Action Plan (2007) and other legislation such as the National Road Traffic Act, Act 93 of 1996. In terms of access to education, there is also alignment with the South African Schools Act, 1996 (Act No. 84 of 1996), and the National Policy for the Equitable Provision of an Enabling School Physical Teaching and Learning Environment (2010). The National Learner Transport Policy provides for the transportation of learners from Grade R to 12, including learners with disabilities as defined by the South African Schools Act of 1996.

There is generally policy alignment between the National Learner Transport Policy (2015) and provincial policies on scholar transport/learner transport. All provinces have developed an aligned provincial learner transport policy which has been approved by provincial executive structures. KwaZulu-Natal is in the process of updating its provincial policy.

- 3. **Programme Appropriateness:** The National Learner Transport Policy (2015) is considered appropriate in terms of the needs of its primary intended beneficiaries (learners), as well as key stakeholders in the learner transport "sector". The NLTP provides for national government to oversee the implementation of the policy in consultation with relevant stakeholders, including provinces, municipalities and School Governing Bodies (SGBs). Although participation in the Learner Transport Programme is generally strong, no meaningful partnerships have been established with civil society organisations, even though these possibly exist in relation to programme monitoring and oversight dialogue.
- 4. **In sum:** The Learner Transport Programme design is considered relevant and appropriate in terms of national priorities, the education and transport sectors' contexts and policies, and institutional environments. Programme eligibility criteria are generally appropriate in terms of beneficiaries' priorities and are being applied with a measure of variability to learners who live 3–10 km from the nearest school. There is some vagueness in the NLTP (2015) which does not

specifically detail the distance threshold for learner eligibility. However, the DOT has developed guidelines for learner eligibility which the provinces would use.

- 5. In summary of the key results (in terms of effectiveness to deliver transport to learners) in the period 2012/13–2016/17, it is clear that the NLTP has made a major contribution to providing a transport solution to qualifying learners in need across South Africa. A total of 499,350 learners across the country in 2017/18 were travelling to and from school in vehicles funded by the Programme. If we contextualise the provision of transport to those learners fortunate enough to receive Programme benefits against the (conservative) estimation of the total learner population (627,1146) who are eligible for inclusion under the Programme, we conclude that the Programme is largely effective in addressing the scale of the learner transport challenge in South Africa. With 75% programme coverage in 2016/17, it is clear, though, that the Programme's effectiveness can be improved, considering the unmet need and underspending.
- 6. The large difference between the reported need by provincial departments and the estimate of the total need using StatsSA data from the GHS 2016, creates significant uncertainty in terms of Programme performance. If we use reported performance data from provincial departments solely, specifically for the reported need, then we could conclude that the Learner Transport Programme nationally is largely effective, based on the understanding of three critical performance factors: (1) An assessment of 83% average programme coverage⁷ of learner transport services provided in the period 2012/13 to 2016/17.8 The average unmet need was therefore 17% in the same period. (2) In terms of punctuality, most of the learners sampled (58%) as well as educators interviewed in this evaluation reported that learner transport vehicles arrived punctually, in time for school. About 13% of learners indicated arriving at school "most of the time", about 24% indicated "sometimes on time" and 4% said that the buses were "always late". Although there are obvious improvements that can be made, the Programme is also considered to be largely successful in this area. (3) In terms of safety, 80% of learners sampled travelled in buses, but 50% of all learners did not use safety belts. Further, combined with the phenomenon of overcrowding (25% of the sample) in buses and taxis, the assessment is that learners supported by the Programme (i) have gained access to learner transport when they probably were unable to do so before, and (ii) about 499,350 learners are being transported in a manner that poses some safety concerns, which presents clear areas for implementation improvements from a road safety perspective.
- 7. If we accept the StatsSA GHS figures for 2016/17 and 2017/18 with conservative assumptions⁹, then the Learner Transport Programme would still be considered relatively **effective in responding to the extent of country need**, based on a performance of 77% for the first factor of average programme coverage for the two years for which we have available data (2016/17 and 2017/18). Programme coverage was 75% in 2016/17 (StatsSA data) from levels of 70%–93% in preceding years (DOT/DBE data). There is a possibility that the assessment of average programme coverage of learner transport services provided will drop in the period 2012/13 to 2016/17 if StatsSA data was available and used in the same period.

⁶ StatsSA GHS 2016.

⁷ Learners transported versus reported need.

⁸ Based on available data.

⁹ See the section on Efficiency for the assessment of the *unmet need* and the use of StatsSA GHS 2016 and GHS 2017.

- 8. **In sum:** The **Programme's performance** would be considered **largely effective** in meeting the national need across the entire period under review. It is important to note that even when utilising a conservative StatsSA GHS 2016 estimate for the *unmet need*, the Programme's response is substantially inadequate in KwaZulu-Natal and Limpopo in 2016/17. There is a significant proportion of learners who have not been counted as part of the *unmet need*¹⁰ because there is no clarity on how many learners are walking more than 5 km (to and from school) in the StatsSA GHS 2016 and 2017 band of learners who take 31–60 minutes to walk to school. Further research is needed to establish what this additional figure may be.
- 9. From the feedback obtained from sampled learners, further significant improvements are possible in terms of safety and punctuality. Overloading, the absence of or non-use of safety belts, and the poor roadworthiness of vehicles are the main safety concerns expressed by the sampled learners.
- 10. As far as immediate outcomes are concerned, when about 499,000 learners across the country in 2017/18 were able to catch buses or minibus taxis (100% subsidised by Government) and mostly arrived at school on time, and in relatively safe transport, access to education was improved and the day-to-day experience of getting to and from school was made easier. Furthermore, inclusion was enabled because learners were now less time-poor, less tired, and were able to get on with day-to-day activities like making and keeping friends (while being transported on the buses), and were more ready and able to participate in educational development activities provided in schools. In this way, a contribution is being made to education- and transport-related higher-level outcomes. In the case of transport, achievements are being registered by the NLTP in terms of: the timeous delivery of a service; a reduction in road accidents (number of); a coordinated approach to planning and implementation; (sub-outcome) adherence to road traffic regulations by operators; (output) vehicle maintenance plans and technical support for emergencies; (sub-outcome) viable and sustainable operations; (output) uniformity of services and tariff structures (output); and a coherent performance monitoring system.
- 11. A reported effect across all nine provinces is that the Learner Transport Programme has improved **enrolments** in schools because learners are being enrolled by their parents or even enrolling themselves (orphans) in schools supported by the Programme, specifically because the Programme is supporting a given school. This represents **an intermediate outcome**, and supports the mandate and institutional outcomes of the provincial departments of education.
- 12. Some other intended consequences are observable, based on the available data: in the Eastern Cape: Local Economic Opportunities for SMMEs, it is reported that the Programme has brought with it a host of opportunities for local businesses to provide services to Government. Though the total number of contracted service providers and the value of the opportunities could not be readily verified in this report, interaction with owners and provincial officials confirm that a number of local entrepreneurs are now sustainably engaged or contracted for the next three years. In addition, many drivers are now employed. The long-term spin-offs may be improvement in livelihoods for the related families in the various districts.

The general national picture emerging from combined provincial analyses as far as implementation of the joint Learner Transport Programme is concerned is one of relatively sound and effective systems on the ground

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¹⁰ See the write-up in the Efficiency section on StatsSA GHS data.

(school level), through the sprawling reach of provincial departments of education down into distant schools at grassroots level. Although obviously and necessarily uneven in places, respondents were generally aware of the Programme, understood what it was meant to achieve, and embraced the value of safely transporting qualifying learners to and from school. Programme coverage has reached about 75% of the national need, and where coverage has been achieved, it is making a big difference to the lives of children in many communities across all nine provinces.

There are significant problems with programme systems and performance data integrity, especially between district and provincial levels, with the result that there are sharp movements in performance data trends from year to year, which cannot plausibly be accounted for. Our evaluation assessment is, therefore, qualified and makes clear recommendations in this regard.

The Programme is, in our view, profoundly **pro-poor**, **pro-education**, **pro-rural** and **pro-inclusion** in its orientation because of its reach into poor and distant communities that find it difficult to access ordinary public schools. Together with other government interventions, such as no-fees in schools and the school nutrition programme, it has a **strong redistributive effect** in improving the day-to-day experiences of children and adolescents in their educational activities and in their lives in general.

There is no need for major policy reorientation. The following policy improvements are proposed:

- R1 The DBE and DOT need to reconsider the distance threshold or consider a range to be used in rural settings and urban settings. The threshold also needs to be clearly stated in the actual policy document to avoid conflicting interpretations by users of the policy.
- R2 A common standard (costing model) for learner transport specifications in Supply Chain Management (SCM) processes should be set to ensure the financial efficiency of the Programme.
- R3 A complete overhaul of district, provincial and national systems for record-keeping, data storage, retrieval and reporting is urgently required to ensure that learner transport policy goals are achieved. Programme management processes and procedures must be strengthened in this regard.

Short Report (5)

The National Learner Transport Programme (LTP) was developed by Government with the aim of addressing the challenges faced by learners who live relatively far from the nearest school and/or experience risks to their personal safety when travelling to and from school. The purpose of this evaluation is to assess the implementation of the DOT/DBE Learner Transport Programme, with specific reference to the current patterns of its operational performance, results (delivery) and immediate outcomes. Performance is assessed relative to the original programme goal(s), objectives and intended outcomes.

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- (15) The scholar transport function will be provided on the basis of a number of principles, including that scholar transport must be affordable, safe and secure. The target group of the Policy is scholars who attend schooling between Grade R to 12 and live more than 3 km from the nearest school (own emphasis).¹²
- (16) The target group for subsidised transport is learners who attend Grade R to 12 and live in areas where they do not have access to public transport services and have to **walk long distances to school** (own emphasis).¹³

¹¹ The source and reference are confusing. The original source is: DOT (2009:11) Final Draft Scholar Transport Policy, which refers to the National Household Travel Survey 2009, typically undertaken by Statistics South Africa. But there is no NHTS 2009! The NHTS 2003 was the last national travel survey undertaken by StatsSA, but in 2010 there was a General Household Survey (GHS) 2010: Focus on Schooling. This evaluation report assumes that the Final Draft Scholar Transport Policy must be referring to a preliminary report that may have been in circulation in 2009, but released in 2010 by StatsSA. In any event, the StatsSA 2003 NHTS is too far back to be useful as background in this 2018 evaluation.

¹² DOT (2009:7).

¹³ DOT (2015:8).

According to the StatsSA (2016:30) GHS, there is a slow decline in the percentage of learners (7–18 years) who walk to school. The majority of learners reported that they walk to school, but as learners get older they are more likely to walk for more than 30 minutes to educational institutions. In 2016, around 5.4% of learners travelled to school by minibus taxi, whereas 9.7% of learners travelled to school in a vehicle hired by a group of parents. The majority of individuals aged 5–18 years who reported that they walk to their educational institutions, walk for less than 15 minutes, while less than 3% of households reported that learners travel to school by minibus or in a bus provided by the school or the government.

KwaZulu-Natal has the highest percentage of learners, and the Western Cape has the lowest percentage of learners, who walk for more than 30 minutes to educational institutions.

Table 2. Proportions of 7 to 18 year olds who use different modes of transport, 2009–2016

Means of transport	2009	2010	2011	2012	2013	2014	2015	2016
Walking	74.9%	73.6%	74.1%	71.8%	72.3%	71.3%	69.0%	68.9%

Source: Statistics South Africa, General Household Survey (GHS)

In terms of the policy contribution, the National Learner Transport Programme was assessed as follows:

- 13. **Programme Relevance:** The National Learner Transport Programme is relevant in terms of the fundamental policy cornerstones: the National Development Plan (NDP) and the Medium Term Strategic Framework (MTSF). The Programme is contributing to Outcome 1: Improved quality of basic education, Outcome 3: All people in South Africa are and feel safe, Outcome 4: Decent employment through inclusive growth, Outcome 5: A skilled and capable workforce to support inclusive growth, and Outcome 6: An efficient, competitive and responsive economic infrastructure network. Furthermore, the pro-poor nature and focus of the LTP are aligned to national priorities, which also aim to purposefully alleviate the economic and social ills of vulnerable and rural communities and reduce the inequality gap.
- 14. **Policy Alignment:** At its base, there is policy alignment of the Programme with the Basic Education and Transport sector mandates, and key policy references as follows: The Constitution of the Republic of South Africa, 1996, Section 85(2)(b) mandates the DOT with the role of developing and implementing transport policy. This Learner Transport Policy is guided by the White Paper on National Transport Policy (1996), the National Land Transport Act, Act 05 of 2009, the National Land Transport Strategic Framework, the Public Transport Strategy and Action Plan (2007) and other legislation such as the National Road Traffic Act, Act 93 of 1996. In terms of access to education, there is also alignment with the South African Schools Act, 1996 (Act No. 84 of 1996), and the National Policy for the Equitable Provision of an Enabling School Physical Teaching and Learning Environment (2010). The National Learner Transport Policy provides for the transportation of learners from Grade R to 12, including learners with disabilities as defined by the South African Schools Act of 1996.

There is generally policy alignment between the National Learner Transport Policy (2015) and provincial policies on scholar transport/learner transport. All provinces have developed an aligned provincial learner transport policy which has been approved by provincial executive structures. KwaZulu-Natal is in the process of updating its provincial policy.

15. **Programme Appropriateness:** The National Learner Transport Policy (2015) is considered appropriate in terms of the needs of its primary intended beneficiaries (learners), as well as key stakeholders in the learner transport "sector". The NLTP provides for national government to oversee the implementation of the policy in consultation with relevant stakeholders, including

provinces, municipalities and School Governing Bodies (SGBs). Although participation in the Learner Transport Programme is generally strong, no meaningful partnerships have been established with civil society organisations, even though these possibly exist in relation to programme monitoring and oversight dialogue.

- 16. **In sum:** The Learner Transport Programme design is considered relevant and appropriate in terms of national priorities, the education and transport sectors' contexts and policies, and institutional environments. Programme eligibility criteria are generally appropriate in terms of beneficiaries' priorities and are being applied with a measure of variability to learners who live 3–10 km from the nearest school. There is some vagueness in the NLTP (2015) which does not specifically detail the distance threshold for learner eligibility. However, the DOT has developed guidelines for learner eligibility which the provinces would use.
- 17. In **summary of the key results** (in terms of effectiveness to deliver transport to learners) in the period 2012/13–2016/17, it is clear that the NLTP has made a **major contribution to providing a transport solution** to a total of 499,350 qualifying learners in need across South Africa in 2017/18. If we contextualise the provision of transport to those learners fortunate enough to receive Programme benefits against the (conservative) estimation of the total learner population (627,114¹⁴) who are eligible for inclusion under the Programme, we conclude that the Programme is **largely effective** in addressing the scale of the learner transport challenge in South Africa. With 75% *programme coverage* in 2016/17, it is clear, though, that the Programme's effectiveness can be improved, considering the *unmet need* and underspending.
- 18. The significant difference between the reported need by provincial departments and the estimate of the total need using StatsSA data from the GHS 2016, creates uncertainty in terms of Programme performance. If we used reported performance data from provincial departments solely, specifically for the reported need, then we could conclude that the Learner Transport Programme nationally is assessed to be largely effective, based on the understanding of three critical performance factors: (1) An assessment of 83% average programme coverage¹⁵ of learner transport services provided in the period 2012/13 to 2016/17. In other words, the Programme response to the national need was on average 83% in the period under review.¹⁶ The average unmet need was therefore 17% in the same period. (2) In terms of punctuality, most of the learners sampled (58%) as well as educators interviewed in this evaluation reported that learner transport vehicles arrived punctually, in time for school. Although there are obvious improvements that can be made, the Programme is also considered to be largely successful in this area. (3) In terms of safety, 80% of learners sampled travelled in buses, but 50% of all learners did not use safety belts. Further, combined with the phenomenon of overcrowding (25% of the sample) in buses and taxis, the assessment is that learners supported by the Programme (i) have gained access to learner transport when they probably were unable to do so before, and (ii) the 499,350 learners are being transported in a manner that warrants implementation improvements from a road safety perspective.
- 19. However, if we accept the StatsSA GHS figures for 2016/17 and 2017/18 with conservative assumptions¹⁷, then the Learner Transport Programme would still be considered **largely**

¹⁴ StatsSA GHS 2016.

¹⁵ Learners transported versus reported need.

¹⁶ Based on available data.

¹⁷ See the section on Efficiency for the assessment of the *unmet need* and the use of StatsSA GHS 2016 and GHS 2017.

effective in responding to the extent of country need, based on performance of 77% for the first factor of average programme coverage for the two years for which we have available data (2016/17 and 2017/18). Programme coverage was 75% in 2016/17 (StatsSA data) from levels of 70%–93% in preceding years (DOT/DBE data). There is a possibility is that the assessment of average programme coverage of learner transport services provided will drop in the period 2012/13 to 2016/17 if StatsSA data was available and used in the same period.

- 20. **In sum:** The Programme's performance would be considered largely effective in meeting the national need across the entire period under review. It is important to note that even when utilising a conservative StatsSA GHS 2016 estimate for the *unmet* need, the Programme's response is substantially inadequate in KwaZulu-Natal and Limpopo in 2016/17. There is a significant proportion of learners who have not been counted as part of the *unmet need*¹⁸ because there is no clarity on how many learners are walking more than 5 km (to and from school) in the StatsSA GHS 2016 and 2017 band of learners who take 31–60 minutes to walk to school. Further research is needed to establish what this additional figure may be.
- 21. From the feedback obtained from sampled learners, further significant improvements are possible in terms of safety and punctuality. Overloading, the absence of or non-use of safety belts, and the poor roadworthiness of vehicles are the main safety concerns expressed by the sampled learners.
- 22. As far as immediate outcomes are concerned, when 499,350 learners across the country in 2017/18 were able to catch buses or minibus taxis (100% subsidised by Government) and mostly arrived at schools on time, and in relatively safe transport, access to education was improved and the day-to-day experience of getting to and from school was made easier. Further, inclusion was enabled because learners were now less time-poor, less tired, and were able to get on with day-to-day activities like making and keeping friends (while being transported on the buses), and were more ready and able to participate in educational development activities provided in schools. In this way, a contribution is being made to education- and transport-related higher-level outcomes. In the case of transport, achievements are being registered by the NLTP in terms of: a timeous delivery of service; a reduction in road accidents (number of); a coordinated approach to planning and implementation; (sub-outcome) adherence to road traffic regulations by operators; (output) vehicle maintenance plans and technical support for emergencies; (sub-outcome) viable and sustainable operations; (output) uniformity of services and tariff structure; and (output) a coherent performance monitoring system.
- 23. A reported effect across all nine provinces is that the Learner Transport Programme has improved **enrolments** in schools because learners are being enrolled by their parents/enrolling themselves (orphans) in schools supported by the Programme, specifically because the Programme is supporting a given school. This represents **an intermediate outcome**, and supports the mandate and institutional outcomes of the provincial departments of education.
- 24. Some other **intended consequences** are observable, based on the available data: in the **Eastern Cape**: **Local Economic Opportunities for SMMEs**, it is reported that the Programme has brought with it a host of opportunities for local businesses to provide services to Government. Though the total number of contracted service providers and the value of the opportunities could not be readily verified in this report, interaction with owners and provincial officials confirm that a number of local entrepreneurs are now sustainably engaged or contracted for the next three

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¹⁸ See the write-up in the Efficiency section on StatsSA GHS data.

years. In addition, many drivers are now employed. The long-term spin-offs may be improvement in livelihoods for the related families in the various districts.

The **general national picture** emerging from combined provincial analyses as far as implementation of the joint Learner Transport Programme is concerned is one of relatively sound and effective systems on the ground (school level), through the sprawling reach of provincial departments of education down into distant schools at grassroots level. Although the impact is obviously and necessarily uneven in places, respondents were generally aware of the Programme, understood what it was meant to achieve, and embraced the importance of safely transporting qualifying learners to and from school. Programme coverage has reached about **75% of the national need**, making a big difference to the lives of children in many communities across all nine provinces.

There are significant problems with programme systems and performance data integrity, especially between district and provincial levels, with the result that there are sharp movements in performance data trends from year to year, which cannot plausibly be accounted for. Our evaluation assessment is, therefore, qualified and makes clear recommendations in this regard.

The Programme is profoundly **pro-poor**, **pro-education**, **pro-rural** and **pro-inclusion** in its orientation because of its reach into poor and distant communities that find it difficult to access ordinary public schools. Together with other government interventions, such as no-fees in schools and the school nutrition programme, it has a **strong redistributive effect** in improving the day-to-day experiences of children and adolescents in their educational activities and in their lives in general.

There is no need for major policy reorientation. The following policy improvements are proposed:

- R1 The DBE and DOT need to reconsider the distance threshold or consider a range to be used in rural settings and in urban settings. The threshold also needs to be clearly stated in the actual policy document to avoid conflicting interpretations by users of the policy.
- R2 A common standard (costing model) for learner transport specifications in Supply Chain Management (SCM) processes should be set to ensure financial efficiency of the Programme.
- R3 A complete overhaul of district, provincial and national systems for record-keeping, data storage, retrieval and reporting is urgently required to ensure that learner transport policy goals are achieved. Programme management processes and procedures must be strengthened in this regard.

Executive Report (25)

Evaluation Approach and Method

The general approach adopted in this evaluation is to follow a "classic" programme evaluation approach, based on typical logic models (theory of change and logical frameworks) which are used to make sense of projects and/or programmes like the National Learner Transport Programme.

In evaluation research terms, the general approach adopted was to utilise accepted research methods in a mixed-methods approach. The purpose was to collect the appropriate data and analyse it using triangulation with a view to establishing a credible assessment of the programme performance of the Learner Transport Programme. As a result, the evaluation design was set up to collect relevant data in all of the performance areas of the National Learner Transport Programme.

Given the diversity and layers of the population to be covered, a *stratified or multistage purposive sampling* strategy was used. The total population of learners who are eligible for learner transport was estimated to be in the region of $370,225^{19}$ which equals N in 2012/13. In 2016/17, N = 521,711. The primary selection of the sample was at school level, with two schools randomly selected per province. In other words, the schools were first selected randomly, followed by the random selection of learners. So the population in this case is N = 3,800 of schools supported by the Programme.

Evaluation Assessment: Relevance and Appropriateness

Key Evaluation Question: To what extent is the design of the Learner Transport Programme appropriate and consistent with the education and transport sectors' priorities and policies, and partnerships with all key stakeholders?

- 1. Programme Relevance: The National Learner Transport Programme is relevant in terms of the fundamental policy cornerstones: the National Development Plan (NDP) and the Medium Term Strategic Framework (MTSF). The Programme is contributing to Outcome 1: Improved quality of basic education, Outcome 3: All people in South Africa are and feel safe, Outcome 4: Decent employment through inclusive growth, Outcome 5: A skilled and capable workforce to support inclusive growth, and Outcome 6: An efficient, competitive and responsive economic infrastructure network. Furthermore, the pro-poor nature and focus of the Learner Transport Programme are aligned to national priorities, which also aim to purposefully alleviate the economic and social ills of vulnerable and rural communities and reduce the inequality gap.
- 2. **Policy Alignment:** At its base, there is policy alignment of the Programme with the Basic Education and Transport sector mandates, with key policy references as follows: The Constitution of the Republic of South Africa, 1996, Section 85(2)(b) mandates the DOT with the role of developing and implementing transport policy. This Learner Transport Policy is guided by the White Paper on National Transport Policy (1996), the National Land Transport Transition Act, Act 22 of 2000, the National Land Transport Strategic Framework, the Public Transport Strategy and Action Plan (2007) and other legislation such as the National Road Traffic Act, Act 93 of 1996. In terms of access to education, there is also alignment with the South African Schools Act, 1996 (Act No. 84 of 1996), and the National Policy for the Equitable Provision of an Enabling School Physical Teaching and Learning Environment (2010). The Learner Transport Policy

¹⁹ This involved using a calculated estimated average increase of 9% in learner transport demand over 2013/14 to 2016/17. See Table 16 in the comprehensive report.

provides for the transportation of learners from Grade R to 12, including learners with disabilities as defined by the South African Schools Act of 1996.

There is generally policy alignment between the National Learner Transport Policy (2015) and provincial policies on scholar transport/learner transport. All provinces have developed an aligned provincial learner transport policy which has been approved by provincial executive structures.

- 3. **Programme Appropriateness:** The National Learner Transport Policy (2015) is considered appropriate in terms of the needs of its primary intended beneficiaries (learners), as well as key stakeholders in the learner transport "sector". The NLTP provides for national government to oversee the implementation of the policy in consultation with relevant stakeholders, including provinces, municipalities and School Governing Bodies (SGBs). Although participation in the Learner Transport Programme is generally strong, no meaningful partnerships have been established with civil society organisations, even though these possibly exist in relation to programme monitoring and oversight dialogue.
- 4. In sum: The Learner Transport Programme design is considered relevant and appropriate in terms of national priorities, the education and transport sectors' contexts and policies, and institutional environments. Programme eligibility criteria are generally appropriate in terms of beneficiaries' priorities, and are being applied with a measure of variability to learners who live 3–10 km from the nearest school. There is some vagueness in the NLTP (2015) which does not specifically detail the distance threshold for learner eligibility. Also, the tariff structures being applied by provinces seem not to take into account the plight of rural route (gravel) operators compared with urban route (tarred) operators, in terms of road conditions and incentives for minimum or shorter routes.

Effectiveness

To what extent has the implementation of the Learner Transport Programme been effective in achieving its goal(s), objectives and intended outcomes? What are the measurable results of the Learner Transport Programme during the period under review?

- 5. **Inputs:** The biggest input into the Programme has been the budget. The vote²⁰ was R1,572 billion in 2012/13 which grew dramatically to R2,66 billion in 2016/17, with an **average annual increase** of 13% over 2012/13–2016/17.²¹
- 6. **Activities:** The main business processes involved in implementing the National Learner Transport Programme (across all nine provinces) have typically been the following generic processes or activities: (1) policy development, (2) budgeting and planning, including recruitment into the Programme, verification and selection, management of the Programme and identification of Programme needs, (3) establishment of structures and systems development, (4) services delivered, including programme coverage, (5) monitoring, audit and evaluation. Generally, a proper process of Programme need identification has occurred in each province.

²⁰ For all provincial programme budgets combined and for all non-recurring expenditure items, such as payments to transport operators.

²¹ See supporting Table 15 in the comprehensive report (Programme Budget) for disaggregated data on voted funding and *all data sources*.

- 7. **Programme output:** In terms of actual learners transported (Programme delivery), based on available data (see Table 14 in the comprehensive report), 330,436 learners were transported nationally by the Programme in 2012/13, 343,402 in 2013/14, 363,529 in 2014/15, 395,592 in 2015/16, 465,977 in 2016/17, and 499,350 in 2017/18. By way of comparison, most learners are transported in the Eastern Cape, Western Cape, Gauteng and Mpumalanga.
- 8. How did the Programme respond relative to the **demand (need) for learner transport** across the country? The demand reported by provincial departments during the period under review ranged from a national total of 403,545 eligible learners requiring learner transport in 2013/14 to 521,711 learners in 2016/17. This is an average annual increase of just 13%, compared with the average annual increase of 21% in the Programme's allocated budget.²² However, there is a significant variance (18%) between the *reported demand* and the *unmet need* in terms of the data supplied in the StatsSA GHS (2016) that is, the *total need* figures for 2017/18 show that there were 627,114 learners requiring transport in South Africa. Even though this is a rather conservative estimate of the *unmet need*, it is 18% more than the reported need (national DBE, DOT).
- 9. In terms of the provincial comparison of **average annual increase**²³ (%) in reported demand (and in order of highest reported need), KwaZulu-Natal increased from 17,521 learners in 2013/14 to 71,000 in 2016/17 (122.7%), Limpopo increased from 19,344 learners in 2013/14 to 34,321 in 2016/17 (27.3%), Gauteng increased from 66,718 learners in 2012/13 to 97,114 in 2016/17 (13.4%), North West increased from 40,722 learners in 2013/14 to 52,684 in 2016/17 (12.4%), Free State increased from 8,061 learners in 2013/14 to 9,736 in 2016/17 (8.2%), Eastern Cape increased from 102,219 learners in 2012/13 to 111,406 in 2016/17 (3.2%), Northern Cape increased from 27,239 learners in 2013/14 to 27,803 in 2016/17 (1.4%) and Western Cape increased from 55,106 learners in 2013/14 to 57,416 in 2016/17 (1.4%) and Mpumalanga decreased from 66,615 learners in 2013/14 to 60,231 in 2016/17 (-3.2%).
- 10. The significant difference between the reported need by provincial departments and the estimated total need using StatsSA data from the GHS 2016, creates uncertainty in terms of Programme performance. If we use reported performance data from provincial departments solely, specifically for the reported need, then we could conclude that the Learner Transport Programme nationally is largely effective, based on the understanding of three critical performance factors: (1) An assessment of 83% average programme coverage²⁴ of learner transport services provided in the period 2012/13 to 2016/17. In other words, the Programme response to the national need was on average 83% during the period under review.²⁵ The average unmet need was therefore 17% in the same period. (2) In terms of punctuality, most of the learners sampled (58%) as well as educators interviewed in this evaluation reported that learner transport vehicles arrived punctually, in time for school. Although there are obvious improvements that can be made, the Programme is also considered to be largely successful in this area. (3) In terms of safety, 80% of learners sampled travelled in buses, but 50% of all learners did not use safety belts. Further, combined with the phenomenon of overcrowding (25% of the sample) in buses and taxis, the assessment is that learners supported by the Programme (i) have gained access to learner transport when they probably were unable to do so before, and (ii) the 499,350 learners are being transported in a manner that warrants implementation improvements from a road safety perspective.

²² A comparison with the actual Programme expenditure was not possible due to gaps in the data.

²³ Average annual increase for all percentages quoted.

²⁴ Learners transported versus reported need.

²⁵ Based on available data.

- 11. However, if we accept the StatsSA GHS figures for 2016/17 and 2017/18 with conservative assumptions²⁶, then the Learner Transport Programme would still be considered **largely effective in responding to the extent of country need**, based on a performance of 77% for the first factor of *average programme coverage* for the two years for which we have available data (2016/17 and 2017/18). *Programme coverage* was 75% in 2016/17 (StatsSA data) from levels of 70%–93% in preceding years (DOT/DBE data). There is a possibility that the assessment of *average programme coverage* of learner transport services provided will drop in the period 2012/13 to 2016/17 if StatsSA data was available and used in the same period.
- 12. **In sum:** The Programme's performance would be considered largely effective in meeting the national need across the entire period under review. It is important to note that even when utilising a conservative StatsSA GHS 2016 estimate for the *unmet* need of 127,764 learners, the Programme's response is substantially inadequate in KwaZulu-Natal and Limpopo in 2016/17. There is a significant proportion of learners who have not been counted as part of the *unmet need*²⁷ because there is no clarity on how many learners are walking more than 5 km (to and from school) in the StatsSA GHS 2016 and 2017 band of learners who take 31–60 minutes to walk to school. Further research is needed to establish what this additional figure may be.
- 13. In terms of actual expenditure relative to the allocated budget, average **underspending** was about 21% for the period under review, noting data fluctuations, and about 5% in 2015/2016 and 2016/17. Against the average Programme **unmet need** (of eligible learners not supplied with transport) of 17%, it is unacceptable that there is any programme underspending.
- 14. Average increases/decreases per provincial Learner Transport Programme delivery in the same period were (in descending order): KwaZulu-Natal (123%), Limpopo (27%), Gauteng (13%), North West (12%), Free State (8%), Eastern Cape (3%), Western Cape (1%), Northern Cape (1%), and Mpumalanga (-3%).
- 15. Programme performance data gaps were very significant, as detailed in the report. There was virtually no data available for programme KPIs, except for the North West province: Learner transport operators contracted (number), contracted learner transport operated (km), cost per learner transport kilometre (R), vehicles operating contracted learner transport (number), and forensic audit reports on scholar transport (number). The absence or unavailability of performance data is partially linked to coordination issues between the DOT and the DBE, as well as management weaknesses at national level which suggests that national departments are unable to compel provincial departments to meet all programme-related obligations.
- 16. The **cost per learner** increased from R4,153 in 2012/13 to R4,856 in 2016/17, and there were unfortunately many data gaps in the number of learner transport kilometres financed by the Programme in the period under review, making it quite difficult to undertake further analysis of budget/expenditure and Programme performance trends.
- 17. There appears to be a **measure of disconnect** between Programme expenditure and the fundamentals of the Programme expenditure grows erratically, but the reported demand for learner transport, the number of learners transported and the overall programme coverage grows more steadily in percentage terms. This assessment is qualified and requires careful

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²⁶ See the section on Efficiency for the assessment of the *unmet need* and the use of StatsSA GHS 2016 and GHS 2017.

²⁷ See the write-up in the Efficiency section on StatsSA GHS data.

examination; missing data is likely to make way for confusing and possibly even contradictory trends in the analysis of key programme areas.

- 18. In **summary of the key results** (in terms of effectiveness to deliver transport to learners) in the period 2012/13–2016/17, it is clear that the Learner Transport Programme has made a **major contribution to providing a transport solution** to a total of 499,350 qualifying learners in need across South Africa in 2017/18. If we contextualise the provision of transport to those learners fortunate enough to receive Programme benefits against the (conservative) estimation of the total learner population (627,114²⁸) who are eligible for inclusion under the Programme, we conclude that the Programme is **largely effective** in addressing the scale of the learner transport challenge in South Africa. With 75% *programme coverage* in 2016/17, it is clear that the Programme's effectiveness can be improved, considering the *unmet need* and underspending.
- 19. The Programme has been assessed to be largely effective in terms of responding to the extent of country need, and performs relatively well in the first factor of average programme coverage (77%) for the two years for which we have available data (2016/17 and 2017/18), but from the feedback it is clear that there are still significant improvements needed in terms of safety and punctuality. Overloading, the absence of or non-use of safety belts, and the poor roadworthiness of vehicles are the main safety concerns expressed by the sampled learners.
- 20. It is clear, though, that even though administrative data indicates that there is an *unmet need* of 17% in terms of average programme coverage in the period under review²⁹, the real situation **on the ground shows significantly higher demand** for learner transport services, which is backed up by data collected from respondents (learners, educators, operators) during the fieldwork conducted for this evaluation. It is also in line with country data (NHTS, 2013; GHS, 2016) on learner transport.³⁰ The inclusion of GHS 2016 data for the *unmet need* for learner transport suggests that the *unmet need* was conservatively about 25% in 2016.
- 21. Based on the performance data available for programme effectiveness above, it is difficult to confidently assess where the provincial function best lies in terms of the two partner departments. The evaluation team's general assessment is that programme data leaves a strong feeling of uncertainty, and it is clear that there are problems with the integrity of the data that is currently available. There are examples of good practice at the school level in many provinces, but the main system weaknesses are evident between the districts (education) and the province (education or transport). Programme performance data in some provinces is "inconsistent" as it moves up from grassroots level (schools) to education districts and ultimately to the lead provincial department. What is clear is that reported performance data sometimes presents as missing, erratic and/or questionable, even though national transport policy, provincial transport policies and general public sector policies, such as the Public Finance Management Act (PFMA), provide a strong policy environment for enabling optimal programme management. In other words, there are significant concerns about the integrity of available programme performance data as identified in the body of this report. This points to the need for programme systems to be strengthened at the district, provincial and national levels, across the entire Learner Transport Programme.

²⁸ StatsSA GHS 2016.

²⁹ And for which data is available.

³⁰ StatsSA 2013, StatsSA 2016.

22. The evaluation team concludes that it would be prudent to separate the day-to-day implementation and management of the Programme on the ground by provincial departments of education from the strategic and high-level programme management at the level of the province, and up to the national level. In other words, the lead departments at the provincial level should ideally be the provincial departments of transport, which are responsible for budgeting, procurement, contract management and province-wide monitoring (including operators), reporting and auditing, and which should work closely with the provincial departments of education in identifying and quantifying the need. A further advantage of this institutional arrangement would be the possibility of including learner transport indicators among the transport sector performance indicators, which in turn would lead to programme performance audits of learner transport performance data by the Auditor-General of South Africa (AGSA).

Efficiency

To what extent has the implementation of the Learner Transport Programme been efficient, with specific regard to (i) organisational design and applied delivery model(s), (ii) core "business processes" used, (iii) management and administration, including record- keeping, and (iv) value for money?

Organisational Design and Delivery Model

23. There appears to be insufficient capacity to plan and implement the Programme in terms of its financial systems and technology. The responses from provincial departments to requests for programme performance information were uneven, with some able to provide information and others unable to provide credible information despite numerous requests. Provincial departments that did respond to the detailed requests for performance information provided data on reported learner demand, actual learners transported, actual expenditure, allocated budgets and the costing model. There were significant discrepancies between the data provided by provincial departments and the performance data supplied by the DOT and the DBE. Data relating to the contract monitoring and procurement required for modelling and cost effectiveness could not be obtained for most provinces.

Management and Administration, including Record-keeping

Is there adequate capacity to plan, run the Programme? What about financial systems, technology? 31

24. In this context, capacity means administrative capacity and thus the ability of an implementing department to run the Programme using dedicated human resources and administrative systems, including data collection systems. In terms of programme performance data, financial and technological systems, there seems to be insufficient capacity to collect and retain performance data for the Learner Transport Programme. The assessment relating to the inadequacy of the performance data systems was based on the speed with which provincial departments responded to requests for programme performance data, whether the requested data was readily available, the reliability of the data obtained in terms of consistency with data available from national departments, and the ability to supply specific programme performance data on request for the period under review.

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³¹ Evaluation TOR question 3.1.3.

25. Performance data supplied to the evaluation team was evidently not produced as an output from an electronic programme management system in use in provincial departments, but was rather compiled manually.

Structures Established and Key Roles

- 26. The Standing Committee on Appropriations (SCOA) and parliamentary portfolio committees provide key policy oversight of national implementation. At national level, the Inter-Departmental Committee consisting of the DBE, DOT and National Treasury plays a coordinating role in providing strategic direction to provincial departments. At provincial level, too, data gathered shows that key structures are put in place to ensure the smooth running of the Programme. There are different levels of structure within provinces. These include structures at provincial level, at district level, in some cases area committees (NW), and at school level.
- 27. In summary: The evaluation reveals that key strategic structures and mechanisms are in place to implement the Programme. This cascades from national level to provincial level and down to school level. Horizontal structures refer to those such as committees between the sector departments. Vertical structures refer to those specifically in the provincial education system, encompassing the corporate sector, districts, school principals and educators, learners, parents and transport operators.

Civil Society Participation

- 28. Although participation in the Learner Transport Programme is generally strong in most provinces, there is little evidence of meaningful partnerships having been established with civil society organisations, even though these may possibly exist in relation to programme monitoring and oversight dialogue.
- 29. In the case of Equal Education and Section 27 in KwaZulu-Natal, the Eastern Cape and Gauteng, there is evidence of antagonistic engagement, sometimes resulting in litigation against the state. Equal Education has on a few occasions instituted litigation to compel the state to provide learner transport to remote area schools. A notable recent example is in Nqutu where 12 schools are now being supported by the Programme.

Location of Learner Transport Function

- 30. Based on the performance data available for programme effectiveness above, it is difficult to confidently assess where the **provincial function** best lies in terms of the two partner departments. The evaluation team's general assessment is that programme data leaves a strong feeling of uncertainty, and it is clear that there are problems with the integrity of the data that is currently available. There are examples of good practice at the school level in many provinces, but the main system weaknesses are evident between the districts (education) and the province (education or transport). Programme performance data in some provinces is "inconsistent" as it moves up from grassroots level (schools) to education districts and ultimately to the lead provincial department. What is clear is that reported performance data sometimes presents as missing, erratic and/or questionable, even though national transport policy, provincial transport policies and general public sector policies (such as the PFMA) provide a strong policy environment for enabling optimal programme management. In other words, there are significant concerns about the integrity of available programme performance data, as identified in the body of this report. This points to the need for programme systems to be strengthened at the district, provincial and national levels, across the entire Learner Transport Programme.
- 31. The evaluation team concludes that it would be prudent to separate the day-to-day implementation and management of the Programme on the ground by provincial departments of education, from the strategic and high-level programme management at the provincial level up to national level. In other words, the lead departments at the provincial level should ideally be the provincial departments of transport, which are responsible for budgeting, procurement, contract management, province-wide monitoring (including operators), reporting and auditing, and which should work closely with the provincial departments of education in identifying and quantifying the need. A further advantage of this institutional arrangement would be the possibility of including learner transport indicators among the transport sector performance indicators, which in turn would lead to programme performance audits of learner transport performance data by the Auditor-General of South Africa (AGSA).

The discussion between provincial departments of transport and departments of education on where the Programme should reside can also be guided by other factors, largely based on notions of an ideal environment for programme efficiency and sustainability.

- 32. **Legislative mandate:** Even though the ultimate goal is to provide access to education, the learner transport function falls squarely into the transport sector. This notion is in line with the provisions of the Constitution (1996) in terms of Section 85(2)(b) which mandates the Department of Transport to develop and implement a learner transport policy. This implies that the Department of Transport constitutionally has the task of including learner transportation in its transport infrastructure and services.
- 33. **Education sectors improving access to education:** The Department of Basic Education is obligated to provide access to education through whichever means possible, including intergovernmental partnerships, such as the building of schools and the provision of hostels or the transportation of learners. Learner transport is a means of facilitating access to education. As several authors³² argue, the Department of Basic Education understands the educational needs of learners and is able to identify such needs, which includes having to travel long distances to school. From this perspective, the Programme at local level must clearly remain with the Department of Basic Education. This is already the case in all provinces, and over and

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³² Authors such as Budlender (2017) and Whitman (2010) advocate that the education department is better placed to spearhead education-related programmes.

above this, the provincial departments of education are also responsible for implementation in Gauteng, the Western Cape, the Northern Cape and KwaZulu-Natal, even though the success of the location varies from province to province.

- 34. **Autonomy of Provincial Executive Committee:** The location of the Programme is left to the Provincial Executive Committee to decide; it is not automatic that it will fall under the education or transport sector.
- 35. **Institutional and administrative capacity:** Administrative capacity is found in the ability of an institution to run the Programme using its dedicated human and financial resources and administrative systems, including data collection systems. Provinces may have built institutional capacity in terms of personnel, budgeting functions and administrative systems over the long term to allow for the institutionalisation of the Programme. It was mentioned earlier in this report that certain business processes such as *need identification* appear to be working relatively well at school level, because they are integrated into the day-to-day functioning of schools in all provinces, under the provincial departments of education. There are, of course, provinces where the Programme resides within the provincial department of transport.
- 36. What could be useful is the separation of operational and oversight activities in the Programme, and the allocation of overall functional responsibility to one national sector department to allow for proper oversight and accountability. The Programme should reside with Transport at the national level, with proper institutional arrangements with the Department of Basic Education which should continue to identify the extent of the need for learner transport. MOUs would need to be amended between the DBE and DOT to this effect, and should cascade down to provincial level. This arrangement has the potential to strengthen horizontal accountability to the DBE as the custodian of access to education and to the DOT as the provider of transport infrastructure and services, as opposed to the DBE having to account to itself.
- 37. Funding model implications/requirements for Programme location: The linkage between the interdepartmental placement of the Programme and funding models is also explored. As noted, current Programme need identification at school level is integrated into the DBE's systems within schools. Irrespective of the location of the Programme, the DBE needs to continue to take responsibility for implementing this activity as it is best placed to do so.

Coordination and Communication

38. A number of current issues were picked up in terms of communication and coordination between key role players and implementing agencies of the Learner Transport Programme. There are a number of areas in which the Programme needs to be strengthened. These include communication and stakeholder involvement, with participation and engagement being fundamental to the success of the Programme. In some provinces, communication between the different vertical levels and horizontal structures is working well, but in other cases there is dysfunctionality or under-performance. Significant care and effort must be given at national and provincial levels to ensure optimal coordination, management and implementation. Poor communication as identified by this evaluation must be addressed.

Efficiency of Core "Business Processes"

- 39. Overall, **recruitment**, **verification** and **selection on entry** into the Programme have been sound, with schools making a sizeable contribution to success in this area. Typically, a thorough process of Programme need identification at school level has occurred in every province. As far as **need identification** (school level) is concerned, the identification of learners who qualify for learner transport is done in the schools by the school principals with the help of SGBs. Need identification at school level is going well. However, need identification at provincial level appears flawed, and there are significant concerns about performance data in this area.
- 40. **Policy development** has been strong, with good consultation and inputs from stakeholders over a number of years.

Structures and **processes** are reasonably well developed and have functioned as intended. **Interdepartmental coordination** has sometimes been ineffective in certain provinces.

- 41. In terms of **programme management** and **systems development**, there are clear weaknesses and gaps in the programme performance management systems in use horizontally across provinces. There are also vertical system weaknesses³³, with ineffective programme management leading to gaps in, and concerns about, the quality of programme performance information.
- 42. The delivery of services is covered under the programme effectiveness assessment.

Monitoring and Reporting

- 43. **School level:** The collection of data and reporting occurs at all of the levels of the Programme. Notably, at local level (schools), principals run a systematic process of monitoring learner transport (drop-offs, pick-ups) on a daily basis. Schools are provided with the operator details and the bus details by provincial departments.
- 44. **Provincial monitoring:** At the provincial level, department of education officials do conduct site visits at selected schools when there are urgent issues to address. However, on-site monitoring by provincial officials is noted to be severely hampered by a lack of capacity, monitoring tools and systems. The lack of reliable monitoring systems, coupled with an inadequate budget and limited capacity within the system, is largely blamed for the discrepancies in the Learner Transport Programme data that is reported to national departments. This also has serious repercussions for planning and budgeting. There is therefore a need to strengthen the monitoring system by finding a more effective mechanism.

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³³ From national down to provincial, and further down to districts and schools.

Value for Money³⁴

- 45. We have not been able to establish if the price paid for learner transport is market-related. We have not inspected documents that indicate whether the prices are reasonable and market-related; nor have we established the basis on which the prices in the pricing models are calculated. However, the description of the pricing model (in the section on Efficiency in the comprehensive report) shows that the price for the Northern Cape and Western Cape appears market-related as the price is obtained through an open tender. An open tender price that is route-specific is market-related and fair as the bidder is expected to know the conditions of the road by the time the bidding process occurs.
- 46. The **measurement of cost per direct beneficiary is unreliable:** The direct beneficiary in the Learner Transport Programme is the learner. The cost per learner calculated is fraught with complications which inhibit its usefulness for decision-making.
- 47. **In general**, the cost drivers for the delivery of the Learner Transport Programme are the fixed rate per learner (dependent on capacity), the number of learners, the number of days and the number of kilometres.
- 48. The **conditional grant** mechanism appears to be the funding mechanism that is consistent with the need to address distance to school, given that the existing funds are ring-fenced. The conditional grant does not, however, create new funds in the system and thus will not eliminate the underfunding that existed before the move to the conditional grant funding mechanism.

Assessment of Learner Transport Service Models

- 49. There are three major service models for learner transport, namely, outsourcing, outright buying and the PPP model. In terms of our assessment of the most efficient service model, based on the calculation of Net Present Cost and Equivalent Annual Cost, the most efficient and optimal service model is the outsourcing option. The Net Present Cost of the outsourcing option is R46,997,907,508 (with Equivalent Annual Cost R6,962,786,685) compared to the PPP option at a Net Present Cost of R97,841,385,061 (with Equivalent Annual Cost R14,495,298,310) and Net Present Cost of R98,884,662,033 for the PPP model (with Equivalent Annual Cost R14,649,860,830).
- 50. Measurement of direct cost to beneficiary and programme costs: Overall, direct costs to beneficiaries could be measured, despite missing financial data for some of the years. The exception is that programme costs cannot be measured reliably for the years 2013–14 and 2014–15, where data relating to actual expenditure is missing for certain provinces. As a result, actual applicable provincial and thus national expenditure for learner transport is understated for those years.

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³⁴ Value for money is concerned with the optimal use of resources. It is about obtaining not necessarily only the cheapest option but delivering the best outcome and impact using the cheapest option or maximising the output and impact per rand spend. The following components of VfM are relevant to the evaluation of the Learner Transport Programme: (1) *Economy*, which translates into whether the provision of learner transport is at the right price and whether the quality of the service, provided by the service provider at that price, is satisfactory, (2) *Efficiency*, which measures how well the Learner Transport Programme converts inputs, (3) *Effectiveness*, which relates to how well outputs are converted into outcomes and impacts; for the Programme this is about how the outcomes, such as the provision of access to education, have been achieved, and (4) *Equity*, which is whether the project produces equal benefits for different groups. *Exclusion error* is a measure of value for money that considers the proportion of the unmet need.

- 51. **Programme costs may be inaccurate:** The comparison of the actual expenditure data from the provinces that provided data and the data available at national departmental level show significant differences between the two data sets.
- 52. Lack of available data on programme administration costs: It was impractical to disaggregate actual expenditure into costs paid to operators and administrative costs. There is a general view that monitoring and administration costs do not apply to all provinces.

Economy

- 53. There is a significant disparity between the average increase in actual expenditure and the average change in actual demand. This is evident in the following provinces: Free State (164% vs 16.3%), Gauteng (101% vs 14.6%), KwaZulu-Natal (-18.8% vs 28.8%), Limpopo (72% vs 18.5%), Mpumalanga (6% vs -2%) and Northern Cape (206% vs. 1.3%). The Western Cape and North West provinces show a plausible and consistent relationship between the increase in actual learners transported and the increase in actual costs.
- 54. As per the above, a generalisation is that the programme costs are not delivering value for money as they are not creating more access per year in relation to the increase in costs. The value seems to be lost in the costing model. It is not clear if the costs we were provided with relate only to the costs to the operators and thus exclude monitoring and administration costs.
- 55. Another plausible explanation for the disparity is that the difference should provide more information on the programme configuration. For example, in Mpumalanga, where we have information that suggests that vehicles are acquired by the operator and the operator is paid a price that recovers his cost and profit and the instalment is paid by the implementing department, the disparity might therefore reflect acquisition costs for buses, thus making it less comparable to a normal outsourcing model.

Costing Model: Duplication and Lack of Equity in Costing Models

- 56. Although the costing models in use are fairly similar for most provinces, there are significant internal variations within them. These variations might inhibit inter-province comparisons of the economy of the price paid and might result in the implementing department paying an unnecessarily high price as a result of possible duplication of costs and might unfairly disadvantage operators in provinces where an unfair model is used. A costing model that remunerates according to both the number of learners and the kilometres travelled might double count the cost as it is likely that the charge per kilometre is also linked to the capacity of the vehicle, thus leading to unnecessary extra cost for the implementing department.
- 57. Equity: Coverage and prioritisation of learners to be ferried under budgetary constraints.
 - Lack of programme equity: Prioritisation is widely followed using criteria to give preference
 to primary school learners over secondary school learners, learners who stay in bushy,
 remote areas and disabled learners. The only problem is that learners who qualify as per a
 set criterion are excluded. The prioritisation will never be fair as the problem of distance and
 access to schools remains.
 - 2. **Exclusion error more than 0%:** All learners who require transport are not catered for, as the average coverage for the review period is less than 100%. The *average programme coverage* for the review period is 83%, based on provincial programme performance data. This

number might seem high, but as long as 100% of the learners are not ferried, the problem of walking long distances to school remains and the delivery model will be regarded as being unfair to learners who qualify for learner transport but cannot be carried because of either the budget reprioritisation or the remoteness of their homes.

3. Reported demand understated: Our deductive conclusion, given our understanding of the Learner Transport Programme, is that the reported demand for learner transport is understated due to the following factors: (i) the migration of students to other places, (ii) the proliferation of informal settlements, (iii) the rationalisation of schools, and (iv) the fact that there is an *unmet* but *unquantified* demand such as the case of the Free State where they are currently serving the students at farms only. The StatsSA GHS 2016 indicates that "12% of those aged 7 to 15 years walked more than 30 minutes to attend educational institutions while 17% of those aged 16 to 18 years walked more than 30 minutes". Further, "98.9% of those aged 7 to 15 years and 89.6% of children aged 14 to 18 years attend school". An "expanded" StatsSA GHS 2016 estimate of the *unmet need* for learner transport is 1,524,385 learners, including all those walking 31–60 minutes to/from school. The conservative StatsSA estimate of the *unmet need* (127,764) adopted for this evaluation excludes this band.

Sustainability and Upscaling?

Key Evaluation Question: How sustainable is the Learner Transport Programme, considering the many competing priorities and demands in the education and transport sectors, and what is the medium- to long-term prognosis of the learner transport challenge that Government is facing? Are there viable alternatives to the current Learner Transport Programme intervention?

Alternative Options to Address Distance to School

58. Alternative ways, such as the building of schools and hostels, could not be evaluated due to the impracticability of performing the exercise in the light of available information which should include the number of students a typical school/hostel takes; the minimum number of students required to run a hostel or school; and the measure of the impact of rationalisation in terms of cost savings from not running a school anymore, the savings and additional learner transport costs associated with an old school being closed, the availability of space to build a school or hostel, and the running costs of both.

Budget Sustainability

- 59. The current budget allocations for learner transport are not adequate: The Programme budget allocation appears to be done on the basis of the available budget which is subject to departmental (re)prioritisation, as opposed to learner need (demand). The current funding shortfall estimate based on this evaluation is **R404,657,892** (2016/17).
- 60. **Unclear budget prioritisation:** It is not clear how provincial departments select learners who qualify from the larger group of learners who are eligible to receive programme benefits especially how selection occurs among learners with similar characteristics (e.g. younger, remote location, etc.).
- 61. **Underspending of budget:** It is noted that there is underspending in the following provinces based on the average utilisation of the budgeted amount over the review period: **Free State**: 63% (average coverage 106%); **KwaZulu-Natal**: 40% (average coverage 70%); **Limpopo**: 73% (average coverage 77%); **Northern Cape**: 62% (average coverage 88%); **Mpumalanga**: 73% (average coverage 100%) and **North West**: 77% (average coverage 71%). Budget underutilisations could be the result of budget reprioritisation linked to the equitable share funding model. Taking into account the *total unmet demand* as estimated from the GHS 2016 and GHS 2017, underfunding is currently **R404,657,892** (2016/17).
- 62. Differences between the provincial and national department data on budget allocations and actual expenditure: Differences were noted in programme financial data reported/held by provincial departments and national departments with respect to budget allocations and actual expenditure. Generally provinces report higher costs and smaller budget allocations. As a result, provincial departments report more efficient budget utilisations. Additionally, there was varying performance data provided (at the request of the evaluators) by the same province over the same period, but submitted at different times.

Emerging Impact

What are the signs of emerging impact of the Learner Transport Programme, if any?

This main focus of this evaluation is on programme implementation. The impact of the Learner Transport Programme is unknown, and there was no evaluation research methodology employed which attempted to measure impact. Although there may be signs of emerging impact loosely referred to in this study, no formal findings on impact are offered by the evaluation team.

A proper programme impact study design should be developed as part of the Improvement Plan agenda in the coming five years, which should be budgeted for.

Recommendations

RECOMMENDATIONS: RELEVANCE AND APROPRIATENESS

- 63. The DBE and DOT need to reconsider the distance threshold or consider a range to be used in rural settings and in urban settings. The threshold also needs to be clearly stated in the actual policy document, to avoid conflicting interpretations by users of the policy.
- 64. A common standard (costing model) for learner transport specifications in SCM processes should be set to ensure the financial efficiency of the Programme.

RECOMMENDATIONS: EFFECTIVENESS

Programme Output

65. The Learner Transport Programme has been largely effective and achieved 75% coverage by 2016/17 in meeting the scale of the learner transport challenge if we accept the StatsSA GHS 2016 conservative estimate of an *unmet need of* 127,764 learners. The Programme's response is substantially inadequate in KwaZulu-Natal and Limpopo in 2016/17.

Significant inefficiencies and capacity issues were identified in the evaluation. It is recommended that Government reviews the learner transport policy response to determine to what extent additional financial resources can be raised to address the underfunding by **R404,657,892** (2016/17).

Safety

66. The Department of Transport must ensure that improved safety compliance is achieved, specifically to address overcrowding, roadworthiness of vehicles and use of safety belts.

Punctuality

67. Although two-thirds of learners in the sample and supported by the Programme are arriving at school punctually for the day's lessons, many learners (24%) are sometimes arriving on time and 4% are always late. This obviously can be improved upon, through better operational management of learner transport services on the ground.

Performance data and systems issues are dealt with in the Efficiency section.

RECOMMENDATIONS: EFFICIENCY

68. **Programme output:** More learners can be transported through improved financial efficiency³⁵ and the disbursement of the full allocated budget in a given financial year. It is also true that improved management and coordination, underpinned by more effective management systems, will enable improved programme effectiveness overall.

³⁵ To be dealt with under the Efficiency and Sustainability sections in the comprehensive report.

Service Model

69. There are **three major** service models for learner transport, namely, outsourcing, outright buying and the PPP model. These service models were evaluated based on Net Present Cost and Equivalent Annual Cost using over the average age of 13 years, at a discount rate of 11%. Because the outsourcing option has the lowest Net Present Cost and Equivalent Annual Cost, it is therefore the most efficient and optimal service model, given the short- to medium-term nature of learner transport as a way of addressing distance to school. The outsourcing model should be continued as a short-term solution to the problem of distance to school.

Programme Location

- 70. The discussion on where the Programme should reside was based on its link to the funding model and the need to strengthen national oversight of the Programme. From the various arguments put forward, this study recommends that the Programme at national level should reside with the Department of Transport as it is constitutionally mandated to develop the learner transport policy and implement it in terms of Section 85(2)(b) of the Constitution.
- 71. In support of the conditional grant as a possible funding model, the funds will be administered by the departments of transport generally, but with the departments of education acting as implementing agents in provinces where the Programme currently resides with Education. This will mean that proper institutional arrangements, such as MOUs between the two sector departments, need to be put in place and adhered to in order to ensure proper coordination of the Programme.
- 72. The need identification function, however, should be integrated into the school system, as it currently is, and the data supplied to the implementing departments for planning and implementation purposes.

Tariff and Costing Model

Although the costing models in use are fairly similar for most provinces, there are significant internal variations within them. In resolving the problems discussed elsewhere in this section, we recommend the following:

- 73. The costing model should provide for the kilometres travelled, the state of the roads, the terrain, the capacity of the vehicle/number of learners transported, allowance for wear and tear and the consequent repair allowance for the vehicle, and should provide a reasonable mark-up. The model should provide for an open tender arrangement and route-specific price determination to avoid the problem of operators abandoning non-profitable routes.
- 74. Develop a detailed model that is used to determine the fairness of the price charged by operators per kilometre and as fair compensation for the state of the road.
- 75. Develop a pricing guideline for learner transport.
- 76. In summary: The costing model should have the following components: (1) an all-inclusive cost per kilometre that is dependent on the capacity of the vehicle, (2) additional compensation for driving on gravel road (charged per gravel kilometre travelled), and (3) a minimum amount given to the operator whose route comprises short trips. An operator travelling short distances might not make sufficient profits to remain in business.

Monitoring Systems and Data Systems

There seems to be insufficient capacity in terms of the financial systems and technology required to collect and retain data for the Learner Transport Programme.

- 77. A complete overhaul of district, provincial and national systems of record-keeping, data storage/retrieval and reporting is urgently required to ensure that learner transport policy goals are achieved. Programme management processes and procedures must be strengthened in this regard.
 - a. It is recommended that the DOT and the DBE develop a proper system for programme record-keeping, data storage/retrieval and reporting which integrates all levels, from schools to districts to provinces and to national.
 - b. The programme management system must preferably be ICT-driven to ensure data integrity and reporting credibility. Programme data retrieval must be efficient and ensure easily-accessible and reliable financial and non-financial performance data for learner transport across all provinces. The recommended system must enable day-today viewing of Programme performance and expenditure data, and allow for real-time access on demand.
- 78. It is also recommended that a full performance audit of the Programme be undertaken by the Auditor-General of South Africa (AGSA) to establish certainty about Programme performance data over 2015–2018.
- 79. Going forward, it is recommended that key Learner Transport Programme indicators be included as sector targets, which the AGSA will audit annually, and that all provinces will report on a quarterly basis. This requires that the Learner Transport Programme be administered under a single department (Transport) as this will allow Programme targets to be included among transport sector indicators and targets.
- 80. The DOT and DBE should engage with StatsSA to establish an adequate, countrywide estimate of learners in need of transport. This will establish a clear baseline against which to measure Programme responsiveness.

Reporting

Differences were noted between the provincial and national department data on budget allocations. The comparison of actual expenditure data from the provinces that provided data and the data available at national departmental level show significant differences between the two data sets. Data relating to the contract monitoring and procurement required for modelling and cost effectiveness was not obtained for most provinces as it was not readily available. It was impractical to disaggregate actual expenditure into costs paid to operators and administrative costs.

- 81. It is recommended that a monitoring tool be developed for each province. This tool will, among other things, contain the following metrics: budgeted and actual cost per district; number transported; amount claimed by operators; schools benefitting per district; number of routes; number of contracts; change in vehicle, tariff, applicable bid from which the tariff was obtained; any change in operator; complaints received and corrective action taken; town, route name and number of days transported.
- 82. Quarterly performance reports to the DBE should be completed in full. Some quarterly reports we inspected for 2012–13 appeared incomplete.

- 83. Quarterly performance reports and data used in the DBE Learner Transport Annual Report must be aligned and cross-checked.
- 84. Quarterly performance data submitted to national authorities must be aligned and cross-checked with provincial records.
- 85. A detailed record of Programme administration costs should be maintained. This could include costs allocated for personnel already performing other functions. Currently only direct costs of learner transport are captured.

Programme Equity

All students who require transport are not catered for as the average coverage for the review period is less than 100%. Our deductive conclusion, given our understanding of the Learner Transport Programme, is that the documented expected demand for learner transport is understated.

- 86. To prevent unsatisfactory coverage, budget **allocations** should be based on the learner transport need. It is not possible to meet the learner demand by simply using the available budget and partially satisfying the demand.
- 87. A detailed exercise should be carried out by the DOT and the DBE to establish the undocumented need for learner transport. This might be in the form of a detailed need identification which starts with a high-level need assessment. This could take the form of a very focused study, such as the General Household Survey conducted by StatsSA.
- 88. The estimated underfunding (based on the conservative StatsSA GHS 2016 estimate) for the Learner Transport Programme of **R404,657,892** (2016/17) needs to be addressed as the funding mechanism selected for implementation will not address the underfunding. For instance, a conditional grant will not address the underfunding problem in the absence of other interventions to source additional funds.

RECOMMENDATIONS: SUSTAINABILITY

Funding Model

- 89. On the balance of factors discussed in the Efficiency section in the main report, we recommend a **conditional grant** as the mechanism to create access to school by tackling the problem of distance. The main issue is not the allocative inefficiencies of the conditional grant but rather the challenge of satisfying the whole need identified without any reprioritisation mechanisms. Despite the drawbacks of conditional grants mentioned above and any additional organisational, reporting and administrative burdens that may accompany such grants, a conditional grant appears to be a viable option to protect the funding for learner transport (and provide greater coverage) and prevent inconsistent and uncertain allocation of funding to the Learner Transport Programme.
- 90. The conditional grant scenario recommended is to have the **DOT holding and distributing the funds** to the provincial level, with transfers to departments of education in Gauteng, the Western Cape, KwaZulu-Natal and Limpopo.
- 91. Where possible, provision should be made for topping up the grant to meet demand. This will also take care of any contingencies that may require additional funding during the course of the

- year, given that conditional grants are not flexible. The DOT, DBE and Treasury should engage with provincial executives to explore the possibility of this arrangement.
- 92. Programme underfunding should be more thoroughly scrutinised. The current level of underfunding requires a further estimation of the actual *unmet need* (over and above the *reported demand*). The estimated underfunding (conservative) for the Learner Transport Programme of **R404,657,892** (2016/17) needs to be addressed as the funding mechanism selected for implementation will not address the underfunding. For instance, a conditional grant will not address the underfunding without there being other interventions to source additional funds.