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The Deputy Director-General: Curriculum Policy, Support and Monitoring

The Department of Basic Education

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For Attention: Ms P. Ngcobo

COMMENTS ON: DRAFT POLICY ON HOME EDUCATION IN TERMS OF THE NATIONAL EDUCATION POLICY ACT 27 OF 1996

Introduction

1. The Eastern Cape Home Schooling Association (hereinafter referred to as "ECHSA") herewith presents its response to the invitation for public comments on the Draft Policy on Home Education (hereinafter referred to as the "Draft Policy") which was published on 17 November 2017.

2. ECHSA thanks the Department of Basic Education (hereinafter referred to as the “DBE”) for the extension to submit comments on the Draft Policy, of which we were notified on 9 December 2017.
3. This submission replaces the ECHSA submission which was submitted on 8 December 2017.
4. ECHSA was established in 1998, and represents home educators in the Eastern Cape Province. ECHSA represents approximately 500 families.
5. The Draft Policy addresses matters pertaining to home education nationally and provincially and as such ECHSA, as a provincial association of home educators, has a direct interest. ECHSA’s members are directly affected by the proposed provisions.

Objection to time-frame for filing of proper comments

6. Although ECHSA is grateful for the extension granted to submit revised comments on the Draft Policy, it is submitted that the time frame is still inadequate. The initial time-frame provided fell over a period when many home educating families and children were writing exams and completing their school year. The extension period fell over the December holiday period and the start of the school year period. Due to the nature of home education, the fact that membership is spread across the Eastern Cape Province in a decentralised fashion, the short time-frame and period of the school year, many challenges were experienced in formulating complete comments. The period for the submission of comments on the Draft Policy also came soon after the closing date of the call for comments on the Basic Education Laws Amendment Bill of 2017. This has added to the burden of submitting meaningful comments at a difficult time of the year.

Objection to the timing of the invitation for public comments

7. ECHSA objects to the timing of the publishing of the Draft Policy for comments. The Basic Education Laws Amendment Bill of 2017 was published on 13 October 2017 and the closing date for comments was 17 November 2017. (ECHSA also objected to the inadequate time-frame provided for public comments to the Basic Education Laws Amendment Bill of 2017.)

8. Within a week of the closing date for public comments on the Basic Education Laws Amendment Bill of 2017, the Draft Policy was published for public comments.
9. The Draft Policy refers to provisions in the South African Schools Act 84 of 1996 (hereinafter referred to as the “SA Schools Act”) in its current unamended form (see paragraphs 6.2.(2) and 7 of the Draft Policy), **and** in its proposed amended form (see for example paragraphs 8.2 and 13(2)(e) of the Draft Policy).
10. The DBE has therefore issued a draft policy (which at most may be categorised as subordinate legislation) relying on provisions in draft primary legislation (in other words, the Basic Education Laws Amendment Bill of 2017) which are still to be analysed, discussed, debated and consulted on.
11. The fact that a Draft Policy was issued by the DBE, which incorporates provisions of draft primary legislation for which consultation processes are not complete, indicates a flagrant disregard for the democratic rights of the citizens in South Africa.
12. This furthermore begs the question whether the DBE intends to take seriously the submissions made on the draft primary legislation or whether the call for public comments was merely lip service being paid to consultation processes.
13. It would appear that the Executive is usurping the role of the Legislature; and infringing on its power by pre-empting the outcome of the consultation processes on the Basic Education Laws Amendment Bill of 2017; whereas such process only began on 13 October 2017.
14. These actions are providing grounds for judicial challenge of the proposed amendments, which will result in the provisions being declared invalid.

Request to engage in meaningful consultation

15. ECHSA requests that the DBE invites representatives of ECHSA to engage in a meaningful consultation process on matters affecting its members, including all aspects relating to the regulation of home education in the SA Schools Act, or any other matters which may affect home education in the Eastern Cape Province.

16. ECHSA requests that its members be given an opportunity to participate in meaningful consultations, be invited to present opinions and expert evidence, and to be heard in public hearings nationally and in the Eastern Cape Province.
17. The content of the provisions which are proposed creates a tension between the private and public spheres of society, and applies to and affects different human rights (the right to human dignity, the right to privacy, the freedom of conscience, religion, thought, belief and opinion, the freedom of expression, children's rights, the right to a basic education, and the right to just administrative action). Due to the fact that children are the focus of the proposed provisions, the application of the best interests of children, has to be of paramount importance. The very nature of the provisions which are proposed therefore demand that extensive consultation and public participation processes be followed throughout the proposed promulgation of the legislation.

Objection to the enabling provision

18. The Policy for the Registration of Learners for Home Education (GG No.20659 published on 23 November 1999) (hereinafter referred to as the "Current Policy"), was issued in terms of section 3(4)(g) of the National Education Policy Act 27 of 1996 (hereinafter referred to as the "National Education Policy Act"). Section 3(4)(g) of the National Education Policy Act provides that the Minister may determine national policy for the organisation, management, governance, funding, establishment and registration of education institutions.
19. Home education is not an "education institution" as is referred to in section 3(4)(g) of the National Education Policy Act. "Education institution" is defined in the National Education Policy Act as "any school contemplated in the South African Schools Act, 1996". "School" is defined in the National Education Policy Act as "a pre-primary, primary or secondary school". The SA Schools Act, in turn, defines "school" as "a public school or an independent school which enrolls learners in one or more grades between grade zero and grade twelve". The definition for public schools in the SA Schools Act refers to a school contemplated in Chapter 3 (which does not include home education). The definition for independent schools in the SA Schools Act refers to a school registered or deemed to be registered in terms of section 46 (which again does not include home education). Home education therefore does not fit within the definition of education institution, as per the definitions of the National Education Policy Act or the SA Schools Act, and it is argued that the empowering provision of the Current Policy, is incorrect and invalid.

20. There does not appear to be any reference to the empowering provision of the Draft Policy.
21. In light of the fact that there is no reference to the empowering provision within the Draft Policy, ECHSA questions whether the Department of Basic Education concedes that the reference to section 3(4)(g) of the National Education Policy Act is/was incorrect and invalid.
22. ECHSA furthermore submits that there are insufficient grounds to argue that the empowering provision is the general introductory portion of section 3(4) of the National Education Policy Act without any reference to the specific subsections listed under section 3(4), due to this general section's referring to the education system. The general portion of section 3(4) reads as follows:
"Subject to the provisions of subsections (1) to (3), the Minister shall determine national policy for the planning, provision, financing, co-ordination, management, governance, programmes, monitoring, evaluation and well-being of the education system (our underlining) and, without derogating from the generality of this section, may determine national policy for - ...".
23. The term "education system" is not defined in either the National Education Policy Act or the SA Schools Act.
24. The term "education" is however defined in the National Education Policy Act as "any education and training provided by an education institution, other than training as defined in section 1 of the Manpower Training Act, 1981". The term "education" is not defined in the SA Schools Act. Therefore, again, the term "education institution" is incorporated into the definition of "education", and it is clear that there exists no empowering provision for the promulgation of a national policy on home education in terms of section 3(4) of the National Policy Education Policy Act.

Comments on Provisions

25. Although ECHSA submits that the empowering provisions are not in existence, and that the Current Policy, and the Draft Policy are invalid, ECHSA does wish to provide detailed comments on proposed provisions, in order to participate in the development and understanding of home education in South Africa.

26. The fact that ECHSA wishes to provide comments, must in no way whatsoever be seen or interpreted to be that it concedes that the Current Policy and/or the Draft Policy are valid.
27. As mentioned above, ECHSA has not had sufficient time to prepare comments on the proposed provisions, even though it wishes to do so. In no way, whatsoever, should these comments be seen to be complete, and where comments are not made on provisions which appear in the Draft Policy, these omissions should not be interpreted to infer that ECHSA agrees with the provisions.
28. Please find below a limited number of comments on the specific paragraphs in the Draft Policy, in the format as was requested on the Department of Basic Education website. (ECHSA strongly opposes many of the provisions in the Draft Policy, as it does in the current SA Schools Act, and the proposed amendments in the Basic Education Laws Amendment Bill of 2017) and therefore ECHSA rejects the mere revision of some of the wording in the paragraphs under discussion.
29. As mentioned, ECHSA requests that extensive consultation occurs, whereby these provisions and the premise on which they are based can be analysed, discussed and solutions reached.
30. You are also referred to the submission made by ECHSA on the Basic Education Laws Amendment Bill of 2017 (**Annexure A**), as there are provisions which were commented on which directly pertain to the provisions in the Draft Policy.

DRAFT POLICY ON HOME EDUCATION

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5-6	1. Definitions	<p>“home education”</p> <ol style="list-style-type: none"> 1. The definition of “home education” is not a definition which is acceptable to ECHSA. It is a limited definition, which has been created to meet the needs of the DBE. This definition does not reflect the true nature of home education as practised by home educators internationally, in South Africa, and in the Eastern Cape Province. 2. The use of the term “programme of education” in the definition is limiting, and does not reflect all home education methodologies and approaches. 3. The insertion of subsection (c) which reads “meets the requirements for registration of a learner for home education contemplated in section 51 (2), is objected to by ECHSA. 4. Although the regulation of home education through registration is provided for in the SA Schools Act, ECHSA places on record that it opposes such regulation through registration and as such ECHSA also opposes the inclusion of the registration requirement in the definition of home education. 5. ECHSA takes the view that parents have the prior right to choose the kind of education that shall be given to their children (as contained in Article 26.3 of the Universal Declaration of Human Rights) and that the State shall respect the liberties, rights and duties of parents to choose the type of

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		<p>schooling for their children (as contained in Articles 11.4 and 13.3 of The African Charter on the Rights of the Child and The International Covenant on Economic, Social, and Cultural Rights respectively).</p> <p>“home education site”</p> <p>This definition is offensive to the members of ECHSA. Home education is where children live and thrive, living in a home, and not a site. Home education takes place in the private sphere of a family and a home, and should not be confused with or construed to merely being a site such as a school building would be.</p> <p>“illegal independent educational institution”</p> <p>ECHSA submits that educational institutions fall within the public sphere of society as opposed to home education which falls within the private sphere of a home and family. It is unnecessary to insert a definition of an educational institution into a document which purports to address home education.</p> <p>“learner”</p> <p>It is not clear why the proposed definition has been used. This definition does not correspond to the definition in the SA Schools Act as it currently stands, or in the BELA Bill.</p> <p>Furthermore, ‘basic education’ is not defined in the legislation.</p> <p>There is no consensus on the meaning of the term ‘basic</p>

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		<p>education'. By incorporating this definition, there will be confusion, inconsistency, uncertainty and ambiguity.</p> <p>“school”</p> <p>This definition for school does not correspond with the definition for school in the SA Schools Act or the National Policy Act. With the introduction of this definition, there will be 3 different definitions for 'school'. There is no consistency between the various documents.</p> <p>“tutor”</p> <p>The definition for tutor is limited and ambiguous. There is no indication as to what is meant by the term 'qualified educator'. It is also submitted that if it is the intention of the DBE to limit tutoring services for home educated children, to people who have obtained qualifications in teaching only, it is a severely limiting and restricting factor, which loses sight of the many rich learning experiences which home educators internationally and in South Africa expose their children to. An example is where an illiterate member of the community provides arts, crafts or music lessons which provide authentic exposure to traditional practices, diversity, and cultural values to a home educated child, the positive impact of which may far exceed that which a 'qualified teacher' may provide.</p>

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7	Paragraph 4.	<p>The nature of basic education</p> <p>The paragraph setting out the nature of basic education is very limited and does not reflect the various aspects of the right to a basic education and what the nature of such a right entails.</p> <p>Although the application of the <i>Juma Masjid</i> case is certainly important when addressing the right to a basic education as contained in section 29.1 of the Constitution, there are numerous other cases which deserve to be mentioned.</p> <p>Academics wrestle with the meaning of the term and nature of a right to a basic education. It is not clear why the DBE attempts to address this in the Draft Policy when the term is not even defined in the SA Schools Act, the National Policy Act or the Children’s Act.</p>
7	Paragraph 5.	<p>The legal framework for home education does not make mention of the International Legal Instruments which directly provide a legal framework within which home education functions. The following International Legal Instruments need to be included:</p> <ol style="list-style-type: none"> 1. The Universal Declaration of Human Rights; 2. The United Nations Convention on the Rights of the Child; 3. The African Charter on the Rights and Welfare of the Child; 4. The International Covenant on Economic, Social and Cultural Rights; and

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		<p>4. The International Covenant on Civil and Political Rights. Not only are these International Legal Instruments applicable, but also case law, and foreign law.</p>
7-10	Paragraphs 4.-9.	<p>It is not clear why it is necessary to incorporate these paragraphs into the Draft Policy. Although certain aspects are accurate and ECHSA appreciates the fact that the DBE has attempted to understand the character of home education in paragraph 8.3, many aspects are incomplete or inaccurate. These aspects require much further analysis and discussion. Paragraph 8.2 also refers to ‘purposeful programme of education’ which ECHSA disagrees with as commented on above pertaining to the definitions.</p> <p>ECHSA also objects to the incorporation of the requirement to register learners. As mentioned above, and in the ECHSA submission on the BELA Bill, ECHSA disagrees with the requirement to register a learner for home education.</p> <p>ECHSA also objects to the inclusion of the wording ‘illegal independent educational institution’ in the scope of home education. The determination of whether an educational institution is legal or illegal is a question of law and fact depending on the circumstances of each case. ECHSA submits that it is inappropriate to incorporate this wording or a negative explanation of what home education is into a policy.</p>

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10-11	Paragraph 10.1	<p>ECHSA objects to the insertion of (k). The wording of 10.1(k)(i) is ambiguous and provides a double standard, which unfairly discriminates against parents who choose to home educate their children.</p> <p>It is also submitted that paragraph 10.1(k)(iii) is unconstitutional and that the provision will not withstand judicial scrutiny. The provision is based on untested and unsubstantiated assumptions and a statement is made about the best interests of the learner, without any justification.</p>
11-13	Chapter 2	<p>Registration</p> <p>ECHSA strongly opposes the requirement to apply to register a child to be educated at home. It is requested that the DBE engages in meaningful consultation processes with ECHSA in order to address this objection. The process and purpose of registration places an unnecessary administrative burden on the DBE as well as families. It is submitted that there are other processes which will better serve the requirements of the DBE and the families affected, rather than increasing peremptory provisions and requirements with little or no effect.</p>
11	Chapter 2 Paragraph 12.(1)	The wording of this provision is ambiguous and the meaning is unclear.

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		<p>One of the interpretations of this paragraph is that a parent may not home educate his child until such time as the HOD has approved the home education of such child. This is a most concerning process. The practical implications and processes which this interpretation will require, will not be in the best interests of children. It would require that children, in whose best interests it is to be home educated, will need to wait for administrative processes to be dealt with. This is contrary to the principle set out in section 6(4)(b) of the Children’s Act which indicates that in any matter concerning a child a delay in any action or decision to be taken must be avoided as far as possible.</p>
11	<p>Chapter 2 Paragraph 12.(2)(b)</p>	<p>Providing a month of the year, by which applications to register must be submitted, requires that home education and the best interests of a child, have to be subordinate to the time-line which is imposed by the Draft Policy. The paragraph does permit a deviation from this time-line, but it places a burden on the parent to then provide “sound reasons” for the delay.</p> <p>Should there be administrative processes and requirements imposed on parents and children by the State, it is submitted that these processes and requirements be as minimal, flexible, and parent and child-centred as possible.</p>
12	<p>Chapter 2 Paragraph 13.(1)(a)</p>	<p>It is not clear why the wording “in the interests of the learner” is utilised. International law, our South African legislation and case</p>

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		<p>law refer to the “best interests of a child” as the criteria to be applied. According to section 28 (2) of the Constitution of the Republic of South Africa, 1996, a child’s best interests are of paramount importance in every matter concerning the child.</p>
12	<p>Chapter 2 Paragraphs 13.(2)(c)(i) and (ii)</p>	<p>The wording “cover the acquisition of content” which is required to be at least comparable to the relevant national curriculum outcomes is concerning.</p> <p>Article 11.4 of The African Charter on the Rights of the Child and Article 13.3 of The International Covenant on Economic, Social and Cultural Rights both refer to parental choice of schools which “conform to the minimum educational standards”.</p> <p>It is submitted that the wording “at least comparable to the relevant national curriculum” is a different standard than “conform to the minimum educational standards”. In fact, it can be argued that these phrases do not correlate at all.</p> <p>Many of the curricula which home educators rely on, do not match the South African national curriculum in a year-by-year, grade-by-grade approach with regard to content and skills.</p> <p>Curricula range across a spectrum of approaches to accommodate the individual needs of families and/or the needs of individual children within families.</p> <p>If this provision is enforced, it is envisaged that there will be litigation to defend the rights of parents to choose for their children</p>

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		<p>the kind of education that shall be given to their children. (See Article 26.3 of The Universal Declaration of Human Rights.) Also, the application of the best interests of the child will be defended in response to the enforcement of this provision.</p> <p>This provision is based on the premise that all children, of a certain age, grade level and ability, must adhere to content and skills acquisition in a set manner which has been developed for basic education <i>en masse</i>. This is an incorrect premise, as the approach to mass education is a significantly different approach to education of the individual in a home environment. Home education predominantly has an individualistic approach to education.</p>
12	Chapter 2 Paragraph 13.(2)(d)	<p>The fact that the PED intends to inspect private homes, is a grave infringement of various human rights as enshrined in the Bill of Rights. Section 14 of the Constitution makes provision for the right to privacy, which includes the right for everyone not to have their person or home searched, their property searched, their possessions seized, or the privacy of their communications infringed. ECHSA submits in the strongest possible terms that the limitation of the rights to privacy and dignity, in this instance, is not justifiable under the limitation clause of the Bill of Rights.</p> <p>It is submitted that the <i>Mistry v Interim Medical and Dental Council of South Africa</i> 1998 (4) SA 1127 (CC) case be studied in this</p>

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		<p>regard. Although the case did not relate to education or child law matters, the right to privacy was analysed and discussed in detail. In the case, the court found that the provision was unconstitutional.</p> <p>It is also submitted that the proportionality test, which was set out in <i>S v Makwanyane</i> 1995 (3) SA 391 (CC), should be considered in this regard. It is necessary to examine whether the breach of the right is justified by the state as being reasonable and justifiable. The existence of safeguards to regulate the way in which state officials may enter the private domains of ordinary citizens is one of the features that distinguish a constitutional democracy from a police State.</p> <p>ECHSA submits that it is not necessary to conduct inspections of homes for the purposes of home education. The State is usurping a role and a function which exceeds what is required in terms of the ratified International Treaties.</p> <p>Again, in this regard, ECHSA requests that the DBE engages in meaningful consultation to discuss how the State's obligations and concerns can be met without unnecessarily infringing on the privacy and dignity rights of those choosing to home educate.</p>
12	Chapter 2 Paragraph 13.(2)(e)	The requirement that parents must undertake to make suitable educational resources available to support the learner's learning is not suitably defined.

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		<p>Many home educating parents have limited financial means, but create significant and healthy learning environments through nature, every-day objects and creative learning experiences.</p>
12	<p>Chapter 2 Paragraph 13.(2)(e)(ii)</p>	<p>This provision is not suitably explained.</p> <p>This may result in parents being required to comply with the same assessment requirements and capturing of results as teachers at school. This is not the essence of home education.</p>
12	<p>Chapter 2 Paragraph 13.(2)(e)(iii)</p>	<p>This provision causes grave concern at different levels.</p> <p>What is understood by the wording 'educational attainment'?</p> <p>ECHSA wishes to engage with the DBE on all aspects relating to the assessment of home educated learners. It is submitted that insistence that parents cover the expense of annual assessments, is onerous. Home educating parents often survive as single income families in pursuit of what is in the best interests of their children.</p> <p>It is also not clear what the DBE intends to do with the required information once it is provided.</p> <p>Prior to imposing a requirement, it is important that those on whom the provision is imposed, understand the effect and consequences of the compliance or non-compliance with the requirement. In other words, should a home educated child be assessed annually, and according to the DBE not be performing</p>

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		satisfactorily, what does the DBE intend to do and how will the assessment information be used?
12	14.	<p>No time-frame is provided within which the HOD has to respond to an application to register a child for home education. The Current Policy indicates in paragraph 9. That the HOD must take all reasonable steps to respond within 30 days after receipt of an application. It is submitted that the DBE is treating a parent wishing to home educate with a heavy handed approach, whereby the parent becomes criminally liable when educating a child at home without the necessary approval and registration, whereas there is no provision which provides any guarantee of a time-frame by which an application matter will be processed.</p>
13	17.	<p>It is most disturbing that the DBE considers a home as a site. The essence of educating a child at home is that it occurs in the private sphere of a family. Although there are some home educating families who follow a 'school-at-home' approach, the essence of home education is not contained in a single work space, designated area or an education programme. The whole home, the community and the world at large is regarded as the education environment.</p> <p>Although ECHSA agrees that it is important for children to have access to space, it is not clear how and why the DBE is imposing</p>

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		<p>this provision, and on what research or comparative schooling model this is being based. ECHSA requests again, that meaningful consultation processes be entered into, in order for these issues to be discussed and workable solutions be arrived at.</p>
13	<p>Chapter 3 Paragraph 18.1(1)</p>	<p>The fact that the Department of Education wishes to prescribe the type of curricula which home educated learners may use, causes grave concern.</p>
	<p>Paragraph 18.5</p>	<p>This paragraph does not correlate with the requirement in paragraph 13(2)(e)(iii).</p>
14	<p>Chapter 3 Paragraph 19.</p>	<p>Chapter 1 paragraph 1 of the Policy on Screening, Identification, Assessment and Support (SIAS) 2014 indicates that its purpose is to provide a policy framework for the standardisation of the procedures to identify, assess and provide programmes for all learners who require additional support to <u>enhance their participation and inclusion in school</u>. It would therefore appear that children with ‘additional support needs’, who are being educated at home, are required to comply with a Policy, the purpose of which is to include them in a school environment. The Policy is clearly geared to the management of learners in a school environment, and has little or no meaningful application or impact</p>

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		<p>on home educated learners. Home education is a positive alternative for many children who struggle within a mainstream school environment. There are ample home educated learners, who may be classified as children with ‘additional support needs’, who have benefited greatly from home education, away from mainstream schooling, and who have or are developing into healthy, functional, contributing, well-adjusted and upstanding citizens of South Africa. It is unfortunate that the Draft Policy misunderstands the benefits of and attraction to home education for children with ‘additional support needs’. The use of the term ‘barriers to learning’ is also inappropriately applied to the home education environment. The term is defined in the SIAS 2014 definition section as referring to ‘difficulties that arise within the education system as a whole, the learning site and/or within the learner him/herself which prevent access to learning and development’ is not a definition which is acceptable to be used in a home education environment. Many home educated learners who had learning barriers while in a mainstream school system overcome the barriers merely by being removed from the ‘education system’ and the ‘learning site’ which are often the very cause of the barriers. It is requested that additional requirements and administrative burdens not be added to these children or their families who provide loving, caring and nurturing environments for their children. It is submitted that there are alternative measures</p>

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		<p>which can be provided to assist and support home educated children who have additional support needs. Here again, ECHSA requests that the DBE engages in a meaningful consultation process in this regard.</p>
15	<p>Chapter 3 Paragraph 23.</p>	<p>This paragraph causes grave concern. ECHSA wishes to make a detailed submission on this provision, but is unable to do so within the limited time-frames provided.</p>

Conclusion

31. We would like to thank the Department of Basic Education for the opportunity to provide constructive comments in relation to matters which affect home education in South Africa in general and the Eastern Cape in particular.
32. We are however concerned about the validity of the Current Policy and the Draft Policy, and therefore strongly reject the proposed provisions contained within in their entirety.
33. We sincerely hope that there will be further opportunities for constructive and collaborative interactions to address the complex problems with actual solutions.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Puchert', with a large, stylized initial 'M'.

Adv. Megan Puchert

Chairperson

The Eastern Cape Home Schooling Association