



The School Fees Landscape in the DRC

ACCELERE!2

30 May 2017

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Contents

Acronyms and Terminology	1
1 Introduction	3
1.1 Purpose of this report	3
1.2 Organisation of the report	4
2 Methodology	5
2.1 The Process of the Survey	5
2.2 Sample Size	7
2.2.1 Geographical Criteria	7
2.2.2 Institutional and System-related criteria	8
2.3 Concern for documentary evidence and triangulation	10
2.3.1 Documented evidence	10
2.3.2 Triangulation	10
3 Findings	11
3.1 The legal framework of school fees	11
3.2 The Scale of School Fees	17
3.3 A fee abolition policy in name only	31
3.3.1 At central MoE level	33
3.3.2 At provincial and district levels	34
3.3.3 At school level	37
3.3.4 Quantifying the burden of school fees	38
3.3.5 Structure of fees	39
3.4 The school fee process	41
3.4.1 Central MoE level.	41
3.4.2 Provincial level.	43
3.4.3 FBO level.	44
3.4.4 School level	45
3.5 Distribution of fees	46
3.6 Use of fees	55
4 Conclusions and ways forward	58
4.1 What can be done?	59
4.1.1 Increasing transparency	59
4.1.2 Building political will	59
4.1.3 Increasing value for money	59
4.1.4 Establishing the legal basis for school fees	60
4.1.5 Establishing norms	60

4.1.6	Involving civil society	61
4.1.7	The role of the Development Partners	61

Acronyms and Terminology

ANAPECO	Association Nationale des Parents d'Elèves du Congo
APEC	Association des Parents d'Elèves Catholiques
APECI	Association des Parents d'Elèves Islamiques
APEKI	Association des Parents d'Elèves Kimbanguistes
APEP	Association des Parents d'Elèves Protestants
BATAM	Bâtiment administratif
BC	Bas-Congo
BDD	Bandundu
BGs	Bureaux Gestionnaires (School Management Offices)
CC	Coordinateur communautaire
CDF	Congolese Franc
CE	Chef d'établissement
CODI	Coordinateur diocésain
COGES	Comité de gestion
COMICO	Communauté islamique en République Démocratique du Congo
CONAT	Coordination Nationale
COPA	Comité de Parents
COPRO	Coordination provinciale
COSPRO	Coordination sous-provinciale
CP	Communauté protestante
CSO	Civil Society Organisation
CSP	Coordinateur sous-provincial (cf. COSPRO)
CR	Conseiller Résident
ECCATH	Ecoles Catholiques
ECASJ	Ecoles conventionnées adventistes du septième
Jour ECC	Ecoles conventionnées catholiques
ECC	Eglise du Christ au Congo
ECF	Ecoles conventionnées de la Fraternité
ECI	Ecoles conventionnées Islamiques
ECK	Ecoles conventionnées kimbanguistes
ECP	Ecoles conventionnées protestantes
ECOFIN	Commission économique et financière
Ecoles conventionnées	Faith-based public schools
Ecoles non-conventionnées	State-run public schools
ECS	Commission économique et financière
EP	Ecole primaire
ES	Ecole secondaire
ENAFEP	Examen National de Fin d'Etudes Primaires (former TENAFEP)
EXETAT	Examen d'Etat
FAP	Frais d'appoint
FBO	Faith-based Organisation

FIP	Frais d'intervention ponctuelle
FF	Frais de fonctionnement
FPEN	Fonds de Promotion de l'Education Nationale
FRAT	Ecoles de la Fraternité
GA	General Assembly
HR	Human Resources
HT	Head Teacher
IDA	International Development Association
IGE	Inspecteur Générale
INGO	International Non-Governmental Organisation
Inspool	Pool Inspection
IPP	Inspecteur Principal Provincial
KAT	Katanga
KOCC	Kasai-Occidental
KOR	Kasai-Oriental
Ma	Maniema
MEPSP	Ministère de l'enseignement primaire, secondaire et professionnel
MoE	Minister (Ministry) of Education
NAT	National level (central MoE
NC	Ecoles non-conventionnées
NP	Non Payé (teacher not on payroll)
NU	Nouvelle unité (teacher not on payroll)
OPM	Œuvres Pontificales Missionnaires
PAD	Project Appraisal Document
PARSE	Projet d'Appui au Redressement du Secteur de l'Education
PFM	Public Finance Management
PROVED	Province éducationnelle (cf. Division)
PROSEB	Projet de Soutien à l'Education de Base
PURUS	Programme d'Urgence de Réhabilitation Urbaine et Sociale
ROI	Règlement d'ordre intérieur (internal rules)
SD	Source document
S/D	Sous-division (cf. S/PROVED)
SECOPE	Service de Contrôle et de la Paie des Enseignants
SERNIE	Service National de l'Identification de l'Elève
SG	Secrétaire Général
SIP	School Improvement Plan
S/PROVED	Sous-province éducationnelle (cf. Sous-Division)
SONAS	Société nationale d'assurances (insurance fee)
SYECO	Syndicat des Enseignants au Congo
SYNECAT	Syndicat des Enseignants Catholiques
TENAFEP	Test National de Fin d'Etudes Primaires
TVET	Technical and Vocational Education and Training
WB	World Bank

1 Introduction

1.1 Purpose of this report

This report contains the findings of a school fees survey carried out under ACCELERE! Activity 2. Data for this survey were collected in the eleven former provinces and the major conurbations of Kinshasa and Lubumbashi between November 2015 and February 2016. The report looks in some detail at: the legality of school fees; the complexity of the charges levied on parents; the mechanisms by which fees are collected and distributed; and the size of the financial burden on parents.

The education system is heavily dependent on user fees. These fees fund not only schools and teachers, but also subsidise the education administration from the local level to the centre through an elaborate and systematic process of redistribution. School fees contribute substantially to the costs of the faith-based organisations that run 85% of schools. Thus, parents are a source of funds for a range of activities, not all of which are directly related to the education of their children. Moreover, the system of fee extraction is coercive, opaque, and unaccountable. This means it offers opportunities for many forms of arbitrary rent-seeking on top of the officially-sanctioned charges.

There are major issues related to school fees. These are concerned with the inadequacy of government funding for education, the inefficiencies of government systems and the weakness of management and fiduciary control mechanisms. School fees fill the gap caused by insufficient public funding and inefficient resource allocation. They are a convenient source of tax revenue for a variety of unaccountable tax collectors who can both make up the rules of the game and benefit from their participation in it. In this sense, the 'school fee problem' is a symptom and manifestation of wider problems of poor governance and weak public financial management.

However, there are also major issues concerned with the effects of a system that relies on the ability to pay in a low-income country context. These are to do with the consequences of heavy and unpredictable user charges on enrolment and retention. A system reliant on unregulated charges is regressive and highly inequitable, disproportionately impacting disadvantaged groups and having a direct negative impact on gender equality. When parents cannot afford to educate both their boys and their girls, it is usually the girls who miss out. Another set of issues is to do with the effects on school planning and management of a system of funding that is subject to constant predation. The paucity and unpredictability in the funds retained in the school will ultimately have an impact on school quality

This report concentrates on a detailed analysis of the nature and extent of school fee practices and describes of a system based on an astoundingly high number of different charges, in whose continuation virtually everyone involved in the delivery of education has a financial interest. The report addresses the governance and public financial management issues in depth. The consequences, in terms of the effects of school fees on enrolment and retention and the equity issues involved have not been the primary focus of this school fees survey. Further discussion of these consequences, the options for reducing the burden of school fees and the implications of doing so is developed in the conclusions section.

It is hoped that this survey report, through providing a detailed view of the school fees landscape, will help to establish a common understanding of the complexities of school funding arrangements and illustrate the difficulties of reform. It is further hoped that this understanding will inform policy

dialogue between the government and the Development Partners on the state of education in DRC and the direction of further efforts to improve education governance.

1.2 Organisation of the report

The report begins with a brief description of the school fees study and the process of data collection and analysis (Section 2)

The findings section (Section 3) starts with an examination of the legality of school fees and the de facto justifications used to support them, in contrast to the government's avowed policy of fee reduction. This is based on an extensive examination of documentation issued by government, Faith-based Organisations, and schools. This is followed by a discussion of the volume, variety and nature of school fees and an assessment of the burden they impose on families. The process of fee setting and collection is then examined. This identifies the beneficiaries and gives an idea of the scale and frequency of upward flows. A great deal of evidence has been collected. Salient points and illustrative examples have been included in the main text. The bulk of the documentary evidence and analytical tables is presented in the Annexes.

The Conclusions are set out in section 4. These examine the available options for dealing with the school fee issue and the consequences, both intended and unintended, of attempts aimed at reducing the education system's reliance on ever-increasing user charges. Given the paucity of public financing of education, the intricacies of school fees and the complexities and inter-relatedness of the extensive vested interests, the options for immediate radical change are very limited. It will take a considerable amount of political will, on the part of the country's leaders, to challenge those vested interests and reduce the monopoly of discretion exercised by those who both levy the charges and benefit from them. The prospect of this happening in the current state of political uncertainty seem slim. However, the establishment of a unified position on the school fees issue amongst the Development Partners is a necessary pre-condition of change in more stable times in the future. The report spells out an approach aimed at lifting the secrecy surrounding school fee practices, improving the use of available government resources, and regulating the currently uncontrolled cost base of the education system.

2 Methodology

The complexity of the DRC school fee system required a standardised model that measured the level and number of fees accurately and ensures comparability of data. Since 2007¹, school fee studies in the DRC have produced varying and even conflicting figures on the level of household contributions. Inconsistencies mainly result from the complexity of the school fee system because of:

- Misinterpretation of fee nomenclature that differs across provinces (e.g., FIP, FAP, etc.) (**Box 1**).
- The fragmented nature of school fee practices countrywide (as documented in Governor decrees and FBO directives)
- Undocumented and therefore unclear estimates of household contributions for teacher salary top-ups (that constitute 60-90% of total fees)
- The multiple and parallel layers of fee collection practices across the system
- Inclusion of costs that are not school fees (uniform, meals, transport, basic school supplies, pocket money etc.).

Box 1: Frais d'intervention ponctuelle (FIP)

The volume of school fees is easily underestimated or inflated. A wrong reading of school fee terminology is one of the risks that may lead to miscalculations. The fee called *frais d'intervention ponctuelle* illustrates that challenge. At the start (1985), a one-off intervention (*intervention ponctuelle*) to meet a specific need in schools, the term gradually became a catch-all. Different meanings coexist today:

- All provinces. School fees decided in General assemblies (GAs) of Parents for specific purposes, such as desk repair, rehabilitation, etc. (T2, Box 16).
- MA, KIN, KAT, KOR and BDD. The FIP are contributions for teacher salary top-ups. In Lubumbashi, FIP and FAP are used interchangeably.
- FBOs. Some FBOs use the term FIP for a variety of purposes (Boxes 5-6).

The methodology used for the survey is outlined below and consists of two major levels of analysis and different steps to provide an efficient model to cover the complexity and scope of the DRC school fee landscape. The model is based on the principle that only documented evidence can underpin the credibility and authority of the findings.

2.1 The Process of the Survey

Level 1: Collection of key supporting documents

- **Step 1.** At national level, copies of the **MoE instructions on school fees (Frais de scolarité pour l'exercice)** were collected. These are generally signed before the start of the school year and complemented by the ***frais techniques*** for TVET schools. Essentially, MoE instructions regulate following fees: ***minerval***, **SONAS**, ***frais des imprimés*** and ***frais techniques***. They are incorporated into Governor decrees at provincial level. MoE instructions are applicable to all public and private schools.

¹ First major school fee study that focused on primary schools, commissioned by UNICEF. Verhaghe J. (2007), School fee policy and practice: frais de fonctionnement or fonds de famille?

- **Step 2**

- 2.1. At provincial levels, copies of **all Governor decrees on school fees (*Arrêtés provinciaux portant fixation des frais scolaires*)** were collected. These are usually signed in September-October at the start of the school year. In some provinces, Governors may sign decrees on a quarterly basis (e.g., Maniema, Bas-Congo). It was therefore important to verify if fees are annual or quarterly to avoid miscalculations. Governor decrees are enforceable on all public schools in that province. Annexes provide details on allocation formulae (*ventilation des quotités, clé de répartition*) and lists of beneficiaries.
- 2.2. At provincial levels, copies of **all Governor decrees on exam fees (ENAFEP for P6, and Examen d'Etat for S6 students)** were collected. These are usually signed in March-April. Exam fees are applicable to all P6 and S6 students of that province.

Steps 1 and 2 provided reliable data on government-sanctioned annual school fees that are applicable to all primary and secondary public (and private) schools across the DRC, disaggregated by province.

- **Step 3.** At provincial levels, copies of **FBOs' Directives on school fees** were collected. These are generally circulated **at the start of the school year** when they communicate their school fee policies to their respective schools. All FBOs collect **additional fees** that differ from one network to another but are enforceable on all schools of that specific network. For instance, Directives from the Catholic COPRO are applicable to all Catholic schools from that Diocese. Sampling of FBOs included **Catholic, Protestant, Kimbanguist and Islamic networks**, as they represent the bulk of the *écoles conventionnées*. Protestant communities (affiliated to the *Eglise du Christ au Congo*) are many (estimated at more than 100) and self-governing, so their school fee policies differ.
- **Step 4.** In selected sample schools, **written correspondence** received from education authorities relating to the collection of school fees from all education authorities, received **during the school year**, was gathered. These come from local education officials (S/PROVEDs, Inspectors, COSPROs, etc.) but also from FBOs. These communications differ from the Directives sent at the start of the school year, because of their **one-off or ad-hoc purpose**. Evidence of these communications was therefore collected from head teachers. As some FBOs do not communicate in writing and convene HTs to meetings for oral communications, school heads were asked to put these instructions in writing (and stamp the documents), to add to the documentary evidence.

Steps 3 and 4 provided documentary evidence of school fee practices that occur at lower levels of the education system and usually go unnoticed. This type of evidence would be hard to collect from officials because of their questionable legal basis. It was therefore important to systematically collect this type of evidence in schools.

Level 2: Collection of additional evidence in schools using a standard questionnaire

The purpose of this process was to collect data on:

- **Fees decided at the school level.** These are mainly **household contributions for teacher salary top-ups** (often called *frais de motivation*) that may correspond to 60-90%

of the total school fee cost. It was therefore important to correctly estimate the magnitude of this fee across all provinces, in both **urban** and **rural areas**, and highlight local disparities.

- **Unforeseen expenses at the school level.** Schools must use part of their operating costs to satisfy the requests of local education officials in a management context which is hierarchical and authoritarian.
- **Step 5. Urban areas**
 - **5.1.** In all provincial ‘capitals’ and selected schools, evidence was collected of **fees decided at school level.** The **General Assemblies (GAs) of Parents** have the authority to decide on the purpose and level of additional fees at the start of the school year. These mainly include:
 - Monthly **contributions from households for teacher salary top-ups** (generally called ***frais de motivation*** but terminology differs from one province to another) (FIP, FAP, contribution etc.);
 - Payments for a specific purpose (such as desk repair, local construction, etc.), commonly called ***frais d’intervention ponctuelle***;
 - Monthly contributions for guards (***sentinelle***);
 - School supplies/accessories such as class diaries, communication books, school logos etc. (sold to students)
 - In-kind contributions (such as reams of paper, soap, brooms etc.)
 - **5.2.** In selected schools, evidence was collected of **payments made to satisfy the demands of local education authorities.**

These may include:

- Back-to-school/end-of-year report templates, training modules, school calendars, pictures of authorities, etc.;
- Contributions for visits, travel, religious activities, workshops, etc. These are not school fees, *stricto sensu*, but schools must draw on their resources to pay these extra costs. Such practices have reached significant proportions and need to be documented.

- **Step 6. Rural areas.**

In selected rural areas and schools, evidence was collected of school fees practices and levels of contributions for teacher salary top-ups.

Steps 5 and 6 provided data on household contributions for teacher salary top-ups. This was done on a representative sampling basis that sought a balance between urban and rural areas, but also between primary and secondary schools that belong to different networks (*écoles conventionnées* and *écoles non-conventionnées*).

2.2 Sample Size

2.2.1 Geographical Criteria

A total of 1,100 primary schools and 591 secondary schools were included in the survey. The study covered **all 11 former provinces** (BC, KOCC, KOR, NK, SK, BDD, Ma, Eq, PO, KAT and KIN). Provinces were divided into ‘urban’ and ‘rural’ zones. **Large urbanised zones** included provincial ‘capitals’ (Kindu, Kikwit, Goma, Mbandaka, Lubumbashi, Matadi, Bukavu, Kisangani,

Mbuji-Mayi, Kananga and Kinshasa - highlighted in yellow **Table 1**); rural/semi-urban sites were selected at random across the 11 provinces (a total of 40).

Not yet part of the fee abolition policy, the towns of **Kinshasa** (*Ville-province*) and **Lubumbashi** received particular attention. This was done to fill a knowledge gap on the level of school fees, document existing practices and get a better view of their financial impact.

Table 1: Number of Selected Primary and Secondary Schools surveyed

Province	Site	Schools		Province	Site	Schools		
		EP	ES			EP	ES	
1. Ma	KINDU	15	11	6. BC	MATADI	15	10	
	Kasongo	10	10		Lukula	15	5	
2. BDD	KIKWIT	15	10	Mbanza Ngungu	15	5		
	Kiri	15	5	Madimba	15	5		
	Bandunduville	15	5	7. SK	BUKAVU	18	18	
	Kenge	15	5		Uvira	15	5	
	Idiofa Centre	14	5	8. PO	KISANGANI	16	11	
Popokabaka	13	4	Djugu		15	5		
3. NK	GOMA	16	18		Buta	15	5	
	Butembo	15	5		Bondo	15	5	
	Walikale 2	15	5		Isiro	15	5	
4. Eq	Lubero	15	5	Faradje	15	5		
	MBANDAKA	16	11	Opala	15	5		
		Bikoro	14	0	9. KOR	MBUJI-MAYI	15	10
		Bumba 1	20	5		Lodja	15	5
		Budjala	11	5		Kabinda	15	5
		Gemena	14	6		Lupatapata	15	5
		Boende	11	5		Lomela 1	15	5
		Libenge	12	13	Ngandajika	14	5	
		Djolu	16	3	10. KOCC	KANANGA	16	10
		Lisala	14	5		Tshikapa	15	5
Gbadolite		11	10	Dimbelenge 1		14	5	
5. KAT	LUBUMBASHI	128	71	Luebo	15	5		
		Kalemie	15	5	11. KIN	KINSHASA	252	190
		Kamina 1	15	5				
		Kolwezi 1 and 2	15	15				
		Sanda 1	15	5				
<i>EP = primary schools</i>		<i>ES = secondary schools</i>		Grand total		1100	591	

2.2.2 Institutional and System-related criteria

- **Proportionality.** In line with most recent DRC education statistics, the sample represented a **balanced proportion** between *écoles non-conventionnées* (NC) and *écoles conventionnées* (ECC, ECP, ECK and ECI):
 - In urban areas, the target number of primary and secondary schools was respectively 15 and 10. In rural areas (where secondary schools are scarce) the target was 15 primary and 5 secondary schools. In some areas, surveyors exceeded the required minimum.
 - In Kinshasa and Lubumbashi, surveyors visited as many public schools as possible to exceed the representative 10% and establish a solid baseline.
 - The Kinshasa sample corresponds to **20% of all primary schools** (total of **252**) and **25% of all secondary schools** (total of **190**) and covered all 3 PROVEDs (East, West and Centre) and districts (from centre to periphery). This included the S/Divisions of Kalamu, Kasavubu, Kinshasa, Lemba (Kin Centre), Bandalungwa, Gombe, Montgafula,

Ngaliema, Selembao (Kin West), Kimbanseke, Limete, Masina, Matete, N’djili and N’sele (Kin East).

- In Lubumbashi surveyors visited **close to 100%** of all public schools covering the 3 S/Divisions (Lubumbashi I, II and III), i.e. a total of **128 primary** and **71 secondary** schools.
- **Selection at random.** Subject to proportionality, all schools were **selected at random.** Wherever applicable, the number of schools selected from one or another network corresponded to the DRC education landscape, based on the MEPSP Annuaire Statistique 2013-14.

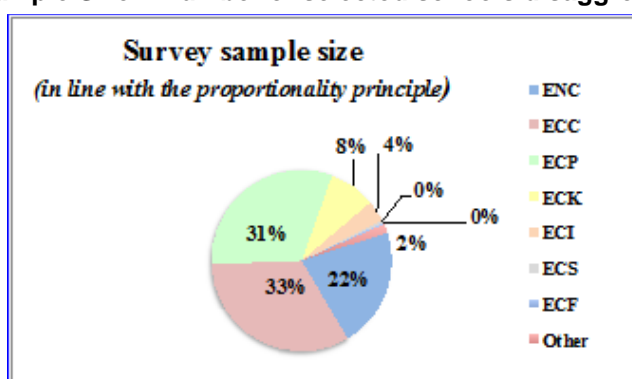
Table 2: Numbers and Proportions of schools sampled disaggregated by network

Primary schools												Secondary schools											
Rural	ECC	ECP	ECK	ECI	NC	ADV	ECS	ECF	LUM	ORTH	NKOY	Rural	ECC	ECP	ECK	ECI	NC	ADV	ECS	ECF	LUM	ORTH	NKOY
PO	46	27	3	1	13	0	0	0	0	0	0	PO	15	5	1	2	7	0	0	0	0	0	0
BDD	32	18	9	0	12	1	0	0	0	0	0	BDD	6	8	4	0	4	1	1	0	0	0	0
Ma	4	3	1	1	1	0	0	0	0	0	0	Ma	4	2	1	2	1	0	0	0	0	0	0
Eq	42	28	14	10	27	0	2	0	0	0	0	Eq	15	15	7	4	11	0	0	0	0	0	0
BC	13	14	5	0	10	0	3	0	0	0	0	BC	5	3	3	0	3	0	1	0	0	0	0
NK	15	17	0	1	10	2	0	0	0	0	0	NK	3	6	1	0	5	0	0	0	0	0	0
SK	3	4	2	1	4	0	0	0	0	1	0	SK	1	1	1	1	1	0	0	0	0	0	0
KOCC	20	12	5	1	6	0	0	0	0	0	0	KOCC	7	3	1	0	4	0	0	0	0	0	0
KOR	29	21	7	3	11	0	0	0	1	0	2	KOR	11	7	2	0	4	0	0	0	0	1	0
KAT	17	18	4	0	15	4	0	0	0	2	0	KAT	8	6	4	0	11	0	0	0	0	0	1
Total	221	162	50	18	109	7	5	0	1	3	2	Total	75	56	25	9	51	1	2	0	1	1	0

Urban												Urban											
ECC	ECP	ECK	ECI	NC	ADV	ECS	ECF	LUM	ORTH	NKOY	ECC	ECP	ECK	ECI	NC	ADV	ECS	ECF	LUM	ORTH	NKOY		
PO	5	3	2	1	4	1	0	0	0	0	PO	4	4	1	1	1	0	0	0	0	0	0	
BDD	3	8	2	0	2	0	0	0	0	0	BDD	2	6	1	0	1	0	0	0	0	0	0	
Ma	4	5	1	2	2	1	0	0	0	0	Ma	4	5	1	0	1	0	0	0	0	0	0	
Eq	3	6	1	2	3	0	0	1	0	0	Eq	3	4	1	0	2	0	0	1	0	0	0	
BC	5	3	1	1	3	0	0	2	0	0	BC	3	2	1	1	2	0	0	1	0	0	0	
NK	4	5	2	1	2	2	0	0	0	0	NK	4	7	1	1	3	2	0	0	0	0	0	
SK	8	4	2	1	2	1	0	0	0	0	SK	4	5	3	2	3	1	0	0	0	0	0	
KOCC	5	4	2	1	4	0	0	0	0	0	KOCC	3	2	3	0	2	0	0	0	0	0	0	
KOR	6	3	2	0	2	1	0	0	1	0	KOR	3	3	1	0	2	0	0	0	1	0	0	
LUB	49	47	2	0	30	0	0	0	0	0	LUB	15	26	3	0	27	0	0	0	0	0	0	
KIN	68	91	16	16	61	0	0	0	0	0	KIN	55	66	17	8	44	0	0	0	0	0	0	
Total	160	179	33	25	115	6	0	3	1	0	Total	100	130	33	13	88	3	0	2	1	0	0	

ADV = Adventist; Lum = Lumière; NKoy = Com Nkoyimique ; ORTH = Orthodox; LUB = town of Lubumbashi

Figure 1: Survey Sample Size – Number of selected schools disaggregated by network



2.3 Concern for documentary evidence and triangulation

The overarching concern of the study was to collect documentary evidence of the findings, based on the principle that statements are only credible when substantiated by supporting documents; and to triangulate or match findings collected from different sources and solidify the evidence base.

2.3.1 Documented evidence

For school years 2014-15 and 2015-16, the following documents were collected and analysed:

- The **legal framework** of the education system (see Box 2)
- **Official documents on school fees** (MoE instructions on school fees (national level) and all 11 Governor decrees, including Annexes (provincial level))
- Collected in schools: **about 550 official letters/written directives** from FBOs and other local education officials requesting additional payments (all 11 provinces)
- Close to **200 minutes of GAs of Parents** (all 11 provinces)
- **Minutes from the MEPSP provincial committees** (3 provinces)
- Collected in schools: about **900 copies of local paysheets** for the payment of teacher salary-top ups (520 at primary and 370 at secondary level)
- Collected from all schools: **substantial evidence (receipts or hand-written statements) of school fee/other payments** to a wide range of education authorities (all 11 provinces).

2.3.2 Triangulation

Questionnaires focused on different aspects of the school fee process (setting and collection of fees) and allowed the triangulation of findings from documented evidence collected in schools; these included

- **540 interviews** with HTs, teachers and COPA members in primary (315) and secondary schools (225) on roles of GAs of Parents, COGES/COPA (all 11 provinces)
- **30 interviews** with members of MEPSP provincial committees on the school fee process (in KOCC, SK, Eq, BC, KOR, Ma)
- **24 interviews** with FBOs on the school fee process (in Ma, BC, KOCC, Eq, PO, SK)
- **190 interviews** with HTs of primary (110) and secondary (80) schools on the payment of fees (in PO, Ma, Eq, KOR, KOCC, BC, SK, KAT)
- **120 interviews** with HTs of primary (70) and secondary (50) schools plus **40 COPA members** on appeal mechanisms and coercion practices (in PO, KOR, KOCC, Ma, Eq, BC).

3 Findings

3.1 The legal framework of school fees

Despite the statement in the DRC constitution that free primary education is a right and a constitutional obligation, school fees have been widespread across DRC since the 1980s. They were initially introduced to cover teachers' salaries and school operating costs following a drastic reduction in the public financing to education in the 1980's and repeated teacher strikes. Subsequently, these fees were gradually formalized and this allowed the education system to partially function during the 1990s, despite the breakdown of the Congolese state. Despite increasing budgetary resources for the MEPS-INC, and higher and more regularly paid teacher salaries in recent years, high school fees remain the main constraint, cited by parents, limiting access to primary education.

It is in this context that, since 2010, the MEPS-INC has been rolling out the "*Politique de gratuité*" (free education policy). The national education strategy (SSEF) retains the objective of free primary education. **However, ample evidence confirms that the payment of school fees is compulsory for millions of households across the DRC.** Comparative data (2006-15) show school fees have been spreading steadily and constantly. This is shown in **Diagram 1 in Annex 1**. At provincial level, adding new fees to existing ones is a recurring practice².

The expanding list of beneficiaries now includes the Provincial MoE (Eq, BDD, SK, KOR, PO), the Governor (Eq, PO), the legal advisor - *Avocat conseil* (SK, KAT), training centers³ (BDD, Eq), the Cabinet of the central MoE (Eq, ENAFEP), etc. Analysis of national and provincial school fee decrees (*arrêtés*) shows they largely benefit to the same authorities at all levels of the system following meticulously calculated allocation formulae (**Diagrams 2-3 in Annex 1**).

Due to the ambiguity of the legal basis of school fees, all education authorities have developed strategies to ensure regular income from schools. Strong evidence shows this mostly occurs arbitrarily and in the absence of a relevant policy, planning and budgeting framework. On top of annual school fees, education officials require multiple extra payments from schools, head teachers, teachers and students (**Table 3**). In particular, faith-based networks (*écoles conventionnées*) rely on their schools to finance religious activities at local, provincial or national levels; some explicitly refer to teachers and students as their *contribuables* or taxpayers (ECK, ECP/CADC 37e). Fee collection has grown into a routine apparatus that operates largely autonomously inside the DRC education system.

Households started co-financing the cost of education when cuts in public spending between 1982-86 drastically dropped from USD118 to USD21 per student⁴. A major turning point occurred in 1992 when the Conférence épiscopale du Zaïre (CEZ) and the Association nationale des parents d'élèves et d'étudiants du Zaïre (ANAPEZA)⁵ called on household contributions to stop a teacher strike over unpaid salaries and to save the school year. Initiated as a stop-gap to solve a

² For the period 2014-16, these are: Concours National de Dictée - CONADI (Ma); Carnet de santé (KIN, KAT); Fonds Provincial pour l'Education - FOPED (PO); Appui à la qualité de l'éducation (BC); Fonds Provincial de l'Education - FPE (KOR); Frais de Fonds Provincial de l'Education (BDD); FOPED (SK); Ecole verte assainie - EVA; Opérationnalisation WIGUP (KIN) et Frais d'identification informatisée et maîtrise du cursus de l'élève (Ministère national). The fee Adhésion à la plateforme WIGUP (Ma) seems to have been removed. (Source: provincial decrees on school fees)

³ *Centre de formation des Cadres de l'EPSP (CFC/EPSP)* in Kikwit and Mbandaka (built by USAID).

⁴ World Bank, Education in the DRC: priorities and options for regeneration, Washington DC, 2005, p. 51. It may be useful to recall the Structural Adjustment Programme (1982-87) imposed by the international financial institutions recommended in the same period the introduction of user fees or the co-financing principle of public services by the user to recover the costs.

⁵ Today respectively CENCO (Conférence Episcopale Nationale du Congo) and ANAPECO (Association Nationale des Parents d'Elèves et d'Etudiants du Congo).

temporary crisis, the prise en charge of teachers (i.e. parents contributions to teacher salary top-ups) became a recurrent practice and, ultimately, a precedent, that with time spread to all fees. The laissez-faire position of the central MoE that condoned networks establishing their school fees, accelerated the process of institutionalisation⁶. This is particularly noticeable in urban centres (e.g., Kinshasa) where the proximity of administrative offices (*bureaux gestionnaires*) and schools is conducive to unquestioned rent-seeking behaviour. Two anecdotes are emblematic of this development. The first one is the school inspector who seeks to fix the flat tire of his car and very naturally collects money from the nearest school; the second one is the story of the teacher who accepts to review the notebooks of her students on condition she finds a CDF500 note inside⁷.

Both the Ministry of Primary and Secondary Education (MEPSP) and faith-based organizations (FBOs) refer to landmark texts to legitimise the collection of school fees (Box 2). The *Loi-Cadre* of 1986⁸ uses the wordings contributions des parents (contributions from parents) and *taux de la participation des parents* (the share of parents in the cost) when referring to the policy of cost sharing⁹. According to the text of the law, household direct co-payments are limited to schools only and do therefore not include e.g., the cost of administrative offices, payments for religious purposes or other financial contributions of any kind¹⁰. In the spirit of the law, the cost-sharing model solicited household support to meet specific school needs as a complement to public resources¹¹. This narrow definition of the word *contributions* has nevertheless provided legal cover to justify deeply entrenched school fee practices. Preambles of Governor decrees on school fees frequently quote the *Loi-Cadre* to lend legitimacy to local school fee policies. The Law also offers additional legal arguments to FBOs for the collection of school fees.

After decades of ambiguous legislation, the new *Loi-Cadre* of 2014 (Law) does not provide the clarity and legal fundamentals that would allow a better regulation of the school fee system, but instead remains incoherent on several fronts. Specifically, the Law introduces a partnership model that puts households and FBOs in the same box. Households figure on top of a list of 12 education partners (*partenaires éducatifs de l'Etat*), ahead of FBOs¹². This further institutionalises the household financing of the system.

Inconsistencies in the law also include competing clauses, as the following examples show:

⁶ Article 43 of the *Loi-Cadre* 86/005 (Chapitre II. Des Compétences de l'Etat) clearly stipulates only the State has authority to define les normes relatives à la mobilisation des ressources nécessaires au fonctionnement de l'enseignement national.

⁷ Anecdotes reported by surveyors in the town of Kinshasa.

⁸ The *Loi-Cadre* 86/005 regulated the DRC education system for almost 30 years until its recent replacement in 2014.

⁹ *Loi-Cadre* 86/005, Articles 100 and 111: Les établissements (scolaires) de l'enseignement national bénéficient d'un financement provenant notamment 1) pour les établissements d'enseignement publics (...) des contributions des parents (Art. 100) and L'Etat fixe chaque année le taux de la participation des parents aux charges des établissements publics d'enseignement (Art. 111).

¹⁰ *Loi-Cadre* 86/005, Article 11: Ils ont l'obligation de contribuer financièrement aux charges de cet établissement. The school in question (établissement) is the school the child attends.

¹¹ These are the so-called *frais d'interventions ponctuelles* (ad hoc contributions) decided by the General Assembly of Parents at the school level and collected to address the needs of the school (Arrêté ministériel N°EDN/CABMIN/EPSP/006/97 of October 13 1997, Article 10) and Circulaire N°EDN/SG/80/0886/97 of October 20 1997, Para 5: Les frais d'interventions ponctuelles: On ne peut y recourir qu'en cas de stricte nécessité auquel cas le taux sera fixé en AG des parents convoquée à cet effet (...). Article 101 of the *Loi-Cadre* specifies the financial responsibilities of the State; these include (i) construction, rehabilitation and equipment; (ii) salaries for teachers and administrative staff; (iii) operating costs; and (iv) costs for didactic equipment and logistics. All of the above are currently co-financed by households.

¹² *Loi-Cadre* 14/004, Article 20: Partnership in education is defined as un mode de gestion par lequel l'Etat associe les différents intervenants pour mettre en commun les ressources humaines, matérielles et financières. Article 21 : Les partenaires éducatifs de l'Etat sont notamment: 1. Les parents; 2. Les promoteurs des établissements privés agréés de l'enseignement national; 3. Les confessions religieuses (...).

- The Law provides a list of funding sources for schools but does not mention household contributions¹³.
- Despite widespread practice, the wording *frais scolaires* (school fees) is used only once and formally associated with Governor decrees¹⁴. They therefore, appear as the sole legal basis for the collection of school fees.
- According to the Law, the central Government determines the amount of the *minerval*¹⁵. No other fee falls under its authority. However, the central MoE continues to decide on other fees, such as the *prime d'assurance scolaire* and the *frais du carnet de santé*¹⁶. The recently introduced *frais d'identification informatisée de l'élève* is another example.

As was the case in the past, the *Loi-Cadre* 2014 does not formally authorise FBOs to collect fees. They feature on the list of education authorities (*bureaux gestionnaires*) in Governor decrees entitled to collect their respective quotas. It is, however, understood they cannot collect fees on their own initiative. Ambiguities and unclear wording not only weaken effective enforcement, but also pave way for diverging interpretations which serve partisan interests.

Box 2: The Legal Framework

1. Landmark texts

- The *Loi-Cadre 86/005 de l'Enseignement national* (1986) recently replaced by the *Loi-Cadre 14/004 de l'Enseignement national* (2014) and applicable to all schools, public and private
- The *Convention de gestion des écoles nationales* (1977) signed by the Catholic, Protestant and Kimbanguist churches, and later by the Islamic Community (1979)
- The *Règlement d'ordre intérieur* (R.O.I.) drafted by the main signatories of the Convention:
 - R.O.I. of the Catholic church (March 14 1978)
 - R.O.I. of the Protestant churches (August 2 1977)
 - R.O.I. of the Kimbanguist church (April 28 1999)
 - R.O.I. of the COMICO (April 29 1996)
 - Others include: Règlement régissant le personnel administratif, enseignant, ouvrier et élève des Ecoles conventionnées Libre Baptiste du Congo (ELBC)

2. Complementary texts

- Amendments or addendums (called *Avenant*) teachers have to sign when they are recruited by the various networks; some examples include:
 - *Avenant à la mise en place pour le personnel des Ecoles conventionnées catholiques*
 - *Fiche d'engagement à la bonne conduite au sein des Ecoles conventionnées protestantes (ECP/CBCA)*
 - *Avenant des Ecoles de l'Armée du Salut*
 - *Engagement sur l'honneur (Avenant) - ELBCO*

¹³ Loi-Cadre 14/004, Article 170: Les établissements publics d'enseignement national bénéficient d'un financement suivant les catégories ci-après (...) For state-run schools: a. Subventions du Gouvernement central, des provinces et des entités territoriales décentralisées; b. Produits de l'autofinancement des établissements; c. Apports des organismes nationaux et internationaux; d. Dons et legs. For FBOs this also includes: Apports des personnes physiques et morales gestionnaires.

¹⁴ Loi-Cadre 14/004, Article 177: Les frais scolaires dans les établissements publics de l'enseignement primaire, secondaire et professionnel (...) sont fixés par arrêté du Gouverneur sur proposition de la commission provinciale de l'enseignement primaire, secondaire et professionnel (...).

¹⁵ Loi-Cadre 14/004, Article 177: Le minerval est fixé par le Gouvernement central pour tous les établissements publics d'enseignement national (...).

¹⁶ Cf. Ministerial decree MINEPS-INC/CABMIN/002/2015 of June 9 2015 (school year 2015-16, repeated in 2016-17).

- *Acte d'engagement à la Solidarité Kimbanguiste*
- Other texts of interest :
 - *Résolutions de la Conférence annuelle des Provinces Orientale et Equateur (June 2015)*

In addition to the *Loi-Cadre*, FBOs refer to the *Convention de gestion des écoles nationales* (1977) to legitimise their school fee policies. The Covenant between State and Church settled long-term tension around contested roles and responsibilities within a complex hybrid system where public schools managed by the State (*écoles non-conventionnées*) and those managed by FBOs (*écoles conventionnées*) have coexisted since colonial times¹⁷. Article 1 of the Covenant confers the day-to-day administration (*gestion*) of faith-based schools to their respective Churches while the State continues to exercise regulatory powers (*pouvoir organisateur*)¹⁸. In line with its role, the State commits to finance the basic costs of all schools¹⁹. For that purpose, FBOs (referred to as Associations) have a special bank account to allow financial transfers between the MoE and the schools, or vice-versa. These transfers exclusively happen via the Legal Representative of the network (e.g., the bishop in Catholic schools)²⁰.

FBOs frequently use the Covenant as a text of reference to legitimise their school fee practices²¹. However, these financial and institutional arrangements may raise some fundamental questions:

- Nowhere in the text is there any mention of *frais scolaires*²².
- According to the text, financial transfers occur between the MoE (*l'Education Nationale*) and the schools, or vice-versa. These transfers transit via the Legal Representative. In other words, the Legal Representative (Church) is a conduit, not the recipient.
- Financial transfers from schools to the MoE (in the text the use of the term vice-versa) are not defined whereas transfers from MoE to schools are formally enumerated (Art. 9, footnote 18)²³.
- The modus operandi outlined in the Covenant is outdated and no longer effective. Teacher salaries are now being paid through banks or via CARITAS (paying agency) and school operating grants are transferred directly to schools.

¹⁷ The Covenant was signed between the State and the Catholic, Protestant and Kimbanguist churches in 1977. The Islamic Community signed in 1979.

¹⁸ La Convention, Article 11: (L'Etat) est le Pouvoir Organisateur de toutes les écoles conventionnées.

¹⁹ La Convention, Article 9: (L'Etat) fournit les finances pour le paiement du personnel, pour les frais de fonctionnement, pour l'entretien, les réparations et le renouvellement des équipements, pour l'entretien et l'extension des constructions.

²⁰ La Convention, Article 9: Tout transfert financier entre l'Education Nationale et la direction de ces écoles ou vice-versa, se fait exclusivement par le canal du Représentant Légal de l'Association concernée.

²¹ 1. The founding text of the Fonds Commun de Solidarité (2009) refers to Articles 3 and 9 of the Covenant to legitimize the initiative. Catholic schools in Kinshasa are required to transfer 20% of their revenue from school fees into a special account (Decrees ARKIN/LMP/0912/2009 and ARKIN/LMP/0913/2009). 2. Reference to Articles 5 and 6 of the Covenant to justify the Oeuvres pontificales missionnaires (OPM), fee collected in all Catholic schools. L'article 5 nous recommande la formation religieuse de nos élèves; l'article 6 nous invite à les initier à l'ouverture au dialogue et au monde (N°BCD/C/KIS/100/1634/2010 of September 24 2010).

²² Some R.O.I. (that complement the Covenant) explicitly refer to household contributions: Les représentants légaux sont les responsables directs de la gestion financière: (...) tout ce qui concerne les frais de scolarité en provenance des parents (Catholic network, R.O.I. of 1978, Art. 28); Les frais de fonctionnement des écoles proviennent de la contribution des parents. Leur taux et modalité de versement sont fixés annuellement par Arrêté Ministériel et circulaire de la CONAT (Islamic network, R.O.I. of 1996, Art.22.). The R.O.I. of Protestant (1977) and Kimbanguist (1999) networks do not contain any reference to school fees

²³ Transfers from schools to the MoE may refer to the minerval without naming it. The minerval is an old tax parents have to pay per student and still figures on the list of compulsory school fees. Before the establishment of the Fonds de Promotion de l'Education nationale (FPEN) in 2006, income from the minerval was collected by the Direction Générale des Recettes Administratives (DGRAD) and was often referred to as frais de scolarité (minerval). Since its introduction, the minerval has been a transfer from schools (households) to central Government.

The above considerations weaken the legal basis of FBOs' justification of their school fee practices. The texts provide flimsy legal backing for the scale and institutionalised nature of school fee practices.

The Covenant confers full authority over HR management to FBOs. Beyond recruitment and deployment, this also applies to moral and spiritual discipline as documented in R.O.I. (*Règlements d'ordre intérieur*) and the Addenda (*Avenants*) staff members must sign when recruited (Box 3). Documents and interviews with head teachers provide abundant evidence of top-down authoritarian management styles across the system. This is particularly true for FBOs where teachers and head teachers fear disciplinary action when they do not comply with instructions. Tithes (*dîmes*) are common and compulsory in Protestant and Kimbanguist networks. Teachers, head teachers, students, schools are required to contribute to a long list of ecclesiastical events (**Table 3**). Not all teachers accept such practices and some file formal complaints (**Box 4**). In a letter to the *Gestionnaires des Ecoles Conventionnées*, the Administrator of Rutshuru Territory (NK) prohibits any deduction from teacher salaries²⁴. The reply from nine Protestant communities in the area sheds light on deeply entrenched ideas about the 'rights' of Churches and 'duties and obligations' of their members (**Box 5**).

Box 3: The Imperative of moral and spiritual discipline

Islamic network. *S'engager en tant que Croyant à contribuer par une aumône légale à la bonne marche des activités de la Communauté.*

(R.O.I. Art. 18)

Protestant network. *En ce qui concerne le personnel enseignant et administratif : (...) le respect de la voie hiérarchique; la soumission à l'autorité établie (...)*

(R.O.I. Art. 3a)

Kimbanguist network. *Le respect de Culte et des Autorités Ecclésiastiques Kimbanguistes ; La soumission à la parole Chrétienne Kimbanguiste (...)*

(R.O.I. Art. 9)

Nous (membres du personnel de l'école) nous nous engageons à apporter notre petite contribution pour son épanouissement, conformément aux articles 3,4, 5 et 6 de la Convention de gestion des Ecoles nationales (...) Nous déclarons que notre engagement à cet acte de solidarité signé en âme et conscience, sans contrainte aucune, est sincère et véridique.

(Engagement à la Solidarité Kimbanguiste)

Salvation Army. *L'agent accepte de travailler dans les écoles de l'Armée du Salut, conformément à l'esprit salutiste qui se caractérise, entre autres, par l'amour, la loyauté, l'honnêteté, la discipline, l'obéissance, l'humilité ; (L'agent) s'engage (...) au soutien matériel, intellectuel et moral de l'œuvre de l'Armée du Salut.*

(Avenant, Art. 2)

ECP/ELBC network. *Tout agent engagé au sein des Ecoles Conventionnées ELBC doit respect et obéissance à toute autorité ecclésiastique et de l'Etat.*

(Règlement, Art. 25)

Atteinte grave à la saine doctrine Biblique telle que (...) le refus de participer au culte

(Règlement, Art. 22. C.)

ECP/CBCA network. *(L'agent) s'engage (...) à respecter les autorités tant scolaires qu'ecclésiastiques ; à contribuer financièrement à la promotion de l'Eglise qui me gère.*

(Avenant, ECP/CBCA)

²⁴ The letter refers to a decree of the central MoE that prohibits deductions from teacher salaries (N°MINEPSP/CABMIN/0456/2010 of July 17, 2010)

ECP/Article 13, alinéa a stipule : *le CA recommande tout fonctionnaire oeuvrant au sein des Institutions Mennonites d'observer le principe Biblique relatif à la dîme (Malachie 3:8,10) – Minutes C.A. of March 12-14 2015*

Adventist network. *Le retournement de la dîme à DIEU est obligatoire et un devoir sacré consenti par d'aucuns sans caporalisation*

(Minutes back-to-school meeting 2015-16, Kindu (Maniema), October 31 2015)

ECP/81e Methodist. *Que tout enseignant oeuvrant dans les écoles protestantes méthodistes paie obligatoirement la dîme comme il avait accepté dans l'Avenant. (Résolutions de la Conférence annuelle des provinces Orientale et Equateur, Kisangani, June 2015).*

Box 4: Multiple Mandatory Payments

(ECP/55è CBCE/NK)

- 1\$ fonctionnement mensuel de l'Eglise
- 1/10 de la prime payé annuellement
- 10\$ au secondaire et 5\$ au primaire, construction bureau de la CC
- 20\$ annuellement et pendant 5 ans : construction Eglise Signers
- 70\$ par école et par mois pour payer « Compte maison »

Box 5: Deduction from teacher salaries

Letter from the Administrator of Rutshuru Territory:

*La dîme, les frais de fonctionnement, les frais de développement de l'Eglise, les frais de fête et de bien d'autres frais d'ordre ecclésiastiques n'étant nullement à confondre avec l'impôt Personnel sur les Revenus perçus par l'Etat (...)
La présente constitue donc une interdiction formelle et sans appel à ces genres de retenues à la source des salaires des enseignants. (Letter N° 5072/114/K41/2015 of May 15 2015)*

Reply from all Protestant communities in Rutshuru, signed collectively (ECP/8e CEPAC, Anglican, CBCA, CEBCE, CADAFA, CNCA, CECA 20, and ECP/Méthodiste)

Néanmoins, de part notre statut, nous sommes une église fonctionnant à l'aide des contributions volontaires des membres. Vu, les différentes activités de développement qu'organise l'église à savoir l'achat des terrains pour la construction des écoles, initiation, construction des nouvelles écoles et leurs équipements, étant donné que l'agent oeuvrant dans nos institutions sont nos membres en conformité aux clauses contenues dans la fiche d'engagement dont copie en annexe ces derniers ont le devoir de contribuer moralement et financièrement à la promotion de l'église qui les gère. (Letter N°10/ECC/TER/SYRU/2015 of July 8, 2015)

In schools, the GA of Parents has authority to discuss and decide on local school fee policy. GAs meet twice, at the start and end of the school year, to discuss school fees and budgets. Numerous GA minutes show these meetings generally take place as planned. At the start of the school year, GAs usually discuss school fees and school fee levels, especially the frais de motivation to pay teachers. The *frais d'interventions ponctuelles* (collected to address the needs of the school) fall

under their authority²⁵. Official texts confer to GAs a position of overarching governing body in schools²⁶.

The institutional anchorage of GAs is a major asset and indicates parents are willing to participate in their respective schools to ensure student learning. However, on the operational side, room for improvement includes weak attendance rates, overrepresentation of teachers, and a tendency to over-focus on school fees. Not all schools organize year-end meetings to close their budgets. Financial reports are generally unavailable. At best, they take the form of impermanent notes written on blackboards. GAs nevertheless present an opportunity to strengthen democratic processes in schools. When properly organized, GAs possess the legitimacy to make decisions and are generally less compromised by co-option and patronage than the COPA and COGES.

Current legal provisions used to ‘legitimise’ school fee practices eclipse overarching constitutional laws and principles. Despite a constitutional commitment to free and compulsory basic education (2005)²⁷ and a flagship fee abolition policy (since 2010), school fees continue to mushroom. In principle, any parent, COPA or Parent Association could take legal action against the State or FBOs for not respecting this obligation. Any parent of a child expelled from the classroom because of unpaid school fees could legitimately do the same. A general feeling that emerges from the reading of Laws and founding texts is a sense of *fait accompli*. This is most evident in Section 7 of the *Loi-Cadre 2014* (titled *Partnership in Education*) that puts parents on the list of education partners (**Box 6**). According to the text, this makes them *de facto* financially liable (Art.24). Partnerships are supposedly built on a “willingly accepted understanding” (*entendement librement accepté*, Art. 20) but in practice do not appear to be based on consultation and consent.

Box 6: Partenariat en matière d'éducation

Art.20. (Le partenariat) constitue une approche participative visant l'implication des différents acteurs de l'éducation scolaire dans la conception et la gestion de l'enseignement national.

L'Etat partage les responsabilités et les tâches pour la réalisation des objectifs éducatifs communs selon un entendement librement accepté des droits et devoirs respectifs.

Art. 24. Les droits et obligations des partenaires sont notamment :

1. La participation active, démocratique et équitable dans les structures instituées pour le fonctionnement du partenariat.
2. La contribution au capital humain, civique, culturel, matériel, patrimonial et financier de l'éducation.

Source: Loi-Cadre 2014

3.2 The Scale of School Fees

A straightforward classification of school fees is not easy. Fees are collected for multiple purposes; occur at different levels of the system and involve long lists of individuals. Fees can

²⁵ Cf. Arrêté ministériel 13 October 1977 (Chapter 1. Legal framework)

²⁶ For instance, Decree M°MINEPSP/CABMIN/0345/2007 of November 23 2007 modifiant et complétant l'Arrêté départemental (...) portant création des Comités des parents dans les écoles de l'enseignement national primaire et secondaire (Art. 8-11); Interministerial Decree N° 0009bis/2008 of August 1 2008 portant instructions relatives à l'utilisation des frais de fonctionnement des établissements d'enseignement primaire, secondaire et professionnel (Art.22); MEPSP, Manuel de procédures à l'attention du SECOPE et des écoles publiques (2009), p.4.

²⁷ L'enseignement primaire est obligatoire et gratuit dans les établissements publics (Article 43). Compulsory and free education was first introduced in 1964 (Constitution de Luluabourg, Art. 33).

be classified under different headings: *Administrators* (Central MoE, Governors, FBOs and sub-provincial education officials, and schools) or *Subordinates* (students, teachers, head teachers, schools, and offices).

Households pay the bulk of the fees directly, but schools (as institutions) and teachers also make financial contributions and these impose indirect burdens on parents. All fees have the school space in common. When teachers pay tithes they do so as members of a faith-based network. Schools that co-finance the construction of an office do so to obey their hierarchical superiors. In both cases, there is a strong likelihood of incurred costs being passed on to households. When teachers lose 10% of their salary every month (*dîme*) they negotiate higher fees in GAs for their salary top-ups. A school that must spend half of the annual operating budget on non-school activities such as e.g., contributions for official visits or national events will seek to compensate the loss and shift the cost burden onto households.

Emblematic of these practices is the widespread *Tête une system*. These are compulsory payments for salary top-ups of administrative staff (*bureaux gestionnaires*). When paying incentives to teachers, schools add one or more names ('heads') onto the paysheet. As a result, part of household contributions voted in GAs to motivate teachers is siphoned off.

In 2013-14, there were some 62,000 public schools, 15 million students and 600,000 teachers. The school system provides a convenient source of predictable revenue. Analysis of Governor decrees and FBO directives²⁸ allows the compilation of a *tentative* list of some 130 fees (**Table 3**).

It is important to note that this list includes the household contributions for teacher salaries (*frais de motivation*) but not the multitude of minor fees decided in GAs to address the needs of schools (**Table 4**). Also absent from the list are rent-seeking practices (particularly observed in Kinshasa), such as the sale of books, training modules and school documents (back-to-school/year-end report templates, school calendars, etc.) at the initiative of education authorities (**Table 5**).

Less than 40% of all the 130 fees in **Table 3** are listed in Governor decrees. FBOs and education authorities (PROVED, S/PROVED, IPP and Inspool) collect the remaining 60% during the school year. These are raised alongside Governor authorised fees, but end-beneficiaries remain basically the same. Essentially, contributions pay for:

- Office construction (all networks),
- Parent associations,
- Visits, travel and installation costs of officials (mainly FBOs),
- Workshops and trainings (all networks), meetings, sport events,
- School construction and land purchase (FBOs),
- Exams and tests²⁹ (all networks),
- Pension funds (FBOs)
- Payments for religious purposes. These represent about 40% of this fee category. Their magnitude provides insight into the power of the clerical hierarchy over the day-to-day administration of schools.

²⁸ For the period 2014-16, documented evidence includes 22 Governor decrees (all former provinces) and some 550 letters from FBOs and other education authorities.

²⁹ Such as the pretests organised before official exam periods, called *Prétex* (pretexts). Head teachers believe they mainly serve to collect more money.

Table 3 provides a list of all formal school fees and the provinces in which they are applicable (School years 2014-15 and 2015-16). This list includes government approved fees, charges levied by FBO networks and teachers' salary top ups by GAs at school level. It does not include fees levied by GAs for non-salary top-up expenditures and informal/arbitrary charges by officials. The first group (1 – 50) listed are authorised by national or provincial governors' decrees. Fee categories 51-131 are levied by FBOs and include a large number of different contributions for religious activities. Boxes 7 -10 illustrate particular entries in the list. The symbols in the list refer to:

Contributions from: ♦ Teachers and head teachers ★ Schools + Students X Bureaux gestionnaires

Table 3: List of School Fees (Central MoE, Governors, FBOs, and sub-provincial education officials)

1. In National and Provincial/Governor decrees

Former Province	List of School fees (School years 2014-15 and 2015-16)
1. All	Minerval
2. All	SONAS/Assurance santé scolaire
3. All	Frais des imprimés / pièces scolaires a. Bulletin de l'élève/ Bulletin cartonné b. Carte d'élève c. Fiche d'identification de l'élève/fiche SERNIE/fiche
4. All	Frais d'identification informatisée des élèves
5. KIN, LUB	Carnet de santé/programme carnet de santé
6. All	Promoscolaire/Assises de la promotion scolaire
7. PO	Mini-promoscolaire
8. Ma, KAT, BC	Formation
9. Ma	Activités culturelles et sportives
10. Ma	Concours national de Dictée (CONADI)
11. Ma, KOCC	Construction/Frais d'appui à la construction
12. All	FF bureaux gestionnaires
13. Ma, BC, Eq	Supplément aux FF de l'école
14. Ma	Bibliothèque scolaire
15. Ma	Solidarités scolaires
16. Ma, KIN	Adhésion à la plateforme WIGUP/Opérationnalisation WIGUP
17. Ma	Activités du 30 avril (Journée de l'enseignement)

1. In National and Provincial/Governor decrees

18. Activités du 30 avril (Journée de l'enseignement) Ma	Frais administratifs/Intervention ponctuelle
19. KAT, PO, BC, KOR, BDD, NK	Frais administratifs / supplétif aux FF/frais d'administration
20. All	Frais techniques (et formation professionnelle)
21. KAT	Frais de construction des bibliothèques (paquet minimum)
22. PO	Questionnaire statistique Division et S/Division
23. PO	Parascolaire
24. PO, BC	Association des parents
25. PO, BDD, NK	Fonds provincial pour l'Education (FOPED)
26. BC	Enseignants assis
27. BC	Aménagement bureaux
28. BC	Conseil provincial/sous-provincial
29. BC	Syndicat des enseignants
30. BC	Formules d'inspection/itinérance
31. BC	Sports scolaires
32. BC	Entretien latrines scolaires (Maman Pipi)
33. BC	Appui à la qualité de l'éducation
34. BC	Appui construction bureau COPRO ECC, ECP et ECK
35. Eq	Frais de maintenance
36. Eq	Infrastructures scolaires
37. Eq	Fonds d'appui à la gratuité
38. KOR	Fonds provincial de l'éducation (FPE)
39. KOR	Frais destinés à l'organisation matérielle des examens
40. KOCC	Frais de sentinelle
41. KOCC	FAP (frais d'appoint) ou : frais d'appui
42. BDD, SK	FIP (frais d'interventions ponctuelles)
43. KIN	Appui aux écoles primaires pour TENAFEP
44. KIN	Ecole verte assainie (EVA)

1. In National and Provincial/Governor decrees

45. KIN	Appui à l'informatisation
46. KIN	FF antennes et bureaux SERNIE/rencontres locales
47. KIN	Appui SERNIE provinciales
48. KIN	Supervision activités scolaires
49. KIN	Autres dépenses a. Equipements divers b. Entretien et réparations c. Fournitures de bureau d. Interventions ponctuelles e. Rencontres locales f. Constitution des bibliothèques g. Frais généraux
50. All	(T)ENAFEP - P6 only
51. All	Examen d'Etat - S6 only

Source: Governor decrees on school fees (2014-15/2015-16)

2. Instructions from FBO s and other education authorities

School network	List of Fees (School years 2014-15 and 2015-16)
52. ECK	Préparatifs de la fête du 25 mai 2015 ★
53. ECK	10\$ de la souveraineté du Chef spirituel / Mbote ya Papa ◇
54. ECP, ECASJ	Dîmes (Box 9) ◇+
55. ECK	Solidarité sectorielle/SO.SEC +
56. ECK	Solidarité communautaire/SO.COM ◇
57. ECP	SCOLARIS/mutuelle de garantie des risques liés à l'éducation +
58. ECP ECP ECC ECK ECK ECK ECK ECP ECI ECC ECP ECASJ ECK ECP/8e CEPAC ECP/30e CPCO	<p>Constructions</p> <p>a. Centre de formation et d'accueil à Kinshasa ★+×</p> <p>b. Bureau de l'Eglise du Christ au Congo à Kindu +</p> <p>c. Bureau de la Coopération diocésaine à Kindu +</p> <p>d. Construction de Nkamba Nouvelle Jérusalem/7 Chantiers ★</p> <p>e. Construction musée ★</p> <p>f. Eq/Résidence du Chef spirituel à Mbandaka +</p> <p>g. Eq/Dépôt sac ciment/bureaux des COPRO et COSPRO ★</p> <p>h. Home des Enseignants à Kinshasa ★×</p>

2. Instructions from FBO s and other education authorities

ECP/CBCO	i. Eq/Réhabilitation bureau COPRO ★
ECK	j. Construction d'une Basilique/Annuaire ★✕
ECC	k. Bureau CC/3è CBCA ★
ECC	l. Bureau COSPRO à Bukavu +
NC/Inspool	m. NK/Temple du Cinquantenaire de Goma ★
NC/MIN	n. NK/Bureau de la COPRO ECP/NK +
ECSE/ESECO	o. KAT/Construction Institut Nsungu Mwane/Kamina +
ECP/CEFMC	p. BDD/Construction bureau COSPRO/Bulungu +
NC/IPP	q. BDD/Construction COSPRO/Kikwit +
NC/SDIV	r. BDD/frais annexes : construction bureau COSPRO +
ECP/35e CUEBC	s. BDD/frais annexes : construction bureau COPRO +
ECC	t. BDD/Complexe administratif EPSP Kikwit 1 +
ECC	u. BDD/Frais ponctuels Construction BATAM S/D Bulungu 1 +
	v. BDD/Construction de tous les Bureaux gestionnaires +
	w. BDD/Bureau de la Coordination /Kikwit +
	x. BDD/Construction BATAM Antenne Idiofa +
	y. BDD/Complexe administratif EPSP Kikwit 2 +
	z. BDD/Elargissement bureau CC des ECP-CUEBC +
	aa. BDD/Construction bureau CODI/Kikwit-centre +
	ab. PO/Construction 2è bâtiment bureau de la Coordination +

59. ECP	Parent associations
FRAT	a. APEP
ECC	scolaire/urbain/commun./provinciale/nationale +
ECP	b. Frais APEF/pour FF CONAT +
ECC	c. SK/FF APEC ★
ECK	d. SK/ Fonctionnement du bureau de l'APEP à Bukavu +
	e. KOR/APEC +
	f. BDD/APEECKI +
60. ECASJ	Visits and travel
ECl	a. Ma/Visite CONAT des ECASJ dans notre juridiction ★
ECK	b. SK/ Séjour du Conseiller national des ECl au Sud- Kivu ★
ECK	c. Contribution aux festivités du 25 mai/Voyage Nkamba ★
ECK	d. PO/Contribution billets de voyages COPRO ★

2. Instructions from FBO s and other education authorities

	e. PO/ Billet représentant provincial Nkamba (3x l' an) ★
61. ECASJ NC NC ECP/CEAC	Mini-promotion scolaire a. Ma/Assises de la mini-promotion sectorielle édition 2015 ★ b. SK/Promoscolaire : organisation mini-session ★ c. KOCC/Mini-promotion scolaire 2014 ★ d. BC/ Assises promoscolaire et Conseil d' administration ★
62. ECASJ	Activités spirituelles a. Semaine de la prière ◊+ b. Camp-meeting scolaire ◊+
63. ECC ECI ECP/20 ^e CECA ECP/11 ^e CAC	FIP (Frais d'intervention ponctuelle)/Eq + (Box 7) FIP (Frais d'intervention ponctuelle)/Eq + FIP (Frais d'intervention ponctuelle)/PO + × ◊ (Box 8) FIP (Frais d'intervention ponctuelle)/PO + ◊
64. All FBOs	Cultes d'action de grâce/ offrandes : Nsinsani, kunji ya kazi ◊+
65. ECP	Eq/Frais additionnels +
66. ECP	Eq/Achat moto ◊+
67. FRAT	Frais de réhabilitation/pour FF CONAT +

2. Instructions from FBO s and other education authorities

<p>68. FRAT ECI ECK NC ECC ECP/CBCO ECP/CEAC NC/Inspool NC/Inspool NC/SDIV NC/SDIV ECP/35e CUEBC ECK NC NC/PROVED NC/Inspool NC NC NC/SDIV NC/ANAPECO NC/Inspool NC/Inspool NC/PROVED NC/PROVED NC NC NC/SDIV</p>	<p>Contributions for workshops and trainings</p> <p>a. Eq/Atelier de 4 jours 20-23 avril 2015 ★</p> <p>b. Eq/Formation élaboration prévisions budgétaires ★</p> <p>c. NK/Séminaire de mise à niveau pour CE ★</p> <p>d. KOCC/Séminaire curricula humanités commerciales ★</p> <p>e. KOCC/Formation sur le thème « L’ éducation et la famille » ★</p> <p>f. BC/Formation gestion d’ une école ★</p> <p>g. BC/Séminaire fonctionnement des organes de cogestion ★</p> <p>h. BC/ Formation des professeurs de français ★</p> <p>i. BC/ Formation : Vulgarisation du nouveau code de la route ★</p> <p>j. BDD/Tenue du 2ième symposium de l’ enseignant ★</p> <p>k. BDD/Atelier technique et d’ évaluation saison 2013-14 ★</p> <p>l. BDD/Formation des aumôniers ★</p> <p>m. PO/Renforcement de capacité des Chefs d’ établissement ★</p> <p>n. KIN/Formation enseignants 6ième ★</p> <p>o. KIN/Formation enseignant sur la gestion d'une école ★</p> <p>p. KIN/Formation écriture et lecture ★</p> <p>q. KIN/Formation parents et élèves ★</p> <p>r. KIN/Formation gestion de l'école ★</p> <p>s. KIN/Formation gestion de conflits ★</p> <p>t. KIN/Formation ANAPECO ★</p> <p>u. KIN/Formation Chef d'Etablissement ★</p> <p>v. KIN/Formation sur la docimologie ★</p> <p>w. KIN/Atelier de formation des chargés de discipline ★</p> <p>x. KIN/Formation santé et environnement ★</p> <p>y. KIN/Formation CREK ★</p> <p>z. KIN/Formation de math et français ★</p> <p>aa. KIN/Formation Compétences de la Vie Courante (CVC) ★</p>
<p>69. ECP/CBCO ECP/CEAC</p>	<p>Contributions for meetings</p> <p>a. BC/Réunion de la rentrée scolaire ★</p> <p>b. BC/Réunion des chefs d’ établissement ★</p>
<p>70. MINIPROV</p>	<p>Eq/Projet Maman Pipi+</p>
<p>71. ECI</p>	<p>Contribution : Conférence islamique du 15 novembre 2014 ★</p>

2. Instructions from FBO s and other education authorities

72. ECI	Revue pédagogique 3-6 novembre 2015 à Kinshasa ★
73. ECC	Frais Œuvres Pontificales Missionnaires (OPM) +x◇
74. ECC	SK/ Mois missionnaire +
75. ECC	SK/Frais informatiques (Bureau des Œuvres socio-scolaires) +
76. ECC	SK/Cotisation syndicale à la SYNECAT◇
77. ECC	SK/ Jubilé de la déclaration sur l'éducation chrétienne ★
78. ECI	Frais avocat/justice a. SK/ Contribution pour payer la dette au parquet de Bukavu + b. SK/Contribution pour payer la dette bâtonnier Lusambo ★
ECP/8 ^e CEPAC	
79. ECP ECP/8 ^e CEPAC	« Tête une » a. SK/bureau du CC : payer un licencié ★ b. NK/Prime d' unité de la Coordination communautaire ★ c. NK/Prise en charge prime des agents de l' EPS-INC ★ d. BDD/Motivation personnel impayé PROVED BDD 2 ★
NC	
NC/PROV	
ECC ECC	e. BDD/La prime des NP bureau Coordination + f. PO/Solidarité ECCATH ★◇
80. NC NC/PROV NC NC/PROV	Sports a. SK/Championnat interscolaire ★ b. BDD/Activités parascolaires ★ c. NK/Tam Tam scolaire ★ d. Activités culturelles et sportives 2014-15 +
81. ECP	SK/ Fonctionnement du bureau de l'APEP à Bukavu +
82. ECP	Infrastructures scolaires a. SK/ Construction de certains infrastructures scolaires + b. SK/Réhabilitation des infrastructures scolaires + c. NK/Constructions écoles dans un état de non viabilité + d. KAT/Projet de construction ou de réhabilitation + e. BDD/Constr. Des Infrastructures Scol. De la Coordination +
ECP/8 ^e CAPAC ECK	
ECP/29 ^e CMUSC ECC	
83. ECP	SK/ Suivi pédagogique de proximité par les gestionnaires +

2. Instructions from FBO s and other education authorities

84. ECP/5e CELPA	SK/ Frais d'appui aux activités pédagogiques +
85. ECI ECP ECP/38 ^e CFCGS ECC	Test d'évaluation a. SK/Test d'évaluation dans toutes les classes du primaire + b. NK/Examen communautaire ★ c. KAT/Organisation de Test d'entraînement + d. Jury/test diocésain +
86. ECASJ ECP	Organisation Pré-test a. SK/Frais Pré-test TENAFEP b. SK/Organisation du Pré-test/contrôle niveau 6 ^e primaire ★
87. ECASJ	SK/Frais Bureaux hiérarchiques +
88. ECP/5e CELPA	SK/Contribution préparatifs AG Extraordinaire CELPA ★
89. NC/SDIV NC/SDIV	Questionnaire statistique a. NK/Collecte de données 2014-15/Questionnaire statistique ★ b. BDD/Remplissage formulaire/questionnaire statistique ★
90. ECK ECK ECC ECP/EDCC ECP/29 ^e CMUSC ECI ECP/3e CBCA ECC ECC ECP/27e MEN ECC ECC ECP/43e CEEC ECP/37e CADC	Contributions for religious activities a. NK/Assister les responsables de l'Eglise locale ◊ b. NK/ Versement de 0,25% part de l' Eglise locale ★ c. KAT/Soutien diocèse – Antenne de Kasenga + d. KAT/Soutien à l'œuvre de notre Seigneur Jésus-Christ + e. KAT/Fonds épiscopal + f. Appui communautaire + g. SK/Contribution au budget de la communauté ★ h. BC/Quête spéciale « Beto tungulula Docese beto » + i. BC/Diocèse Matadi : Appui à la pastorale éducative + j. BDD/Offrandes de Noël ◊+× k. BDD/Offrandes, quêtes, taxes, impôts ecclésiastiques ◊+× l. BDD/ Soutien Diocèse + m. BDD/Perception impôt communautaire + n. BDD/Participation au fonctionnement communauté ◊+
91. ECC	NK/ Frais périphériques ◊
92. NC	NK/ Fiche de l'élève candidat aux EXETAT ★

2. Instructions from FBO s and other education authorities

93. NC	NK/ Fiche blanche (élèves 5è secondaire) ★
94. ECP/29e CMUSC	KAT/ Démarrage du bureau de la Coordination Methodiste +
95. ECP/29e CMUSC	KAT/ Contribution à la retraite de l'Evêque Katembo Kainda +
96. ECC	KAT/Frais bibliothèques +
97. ECC	KOCC/KOR/Fonds d'appui à l'éducation chrétienne +X
98. ECC	KOCC/Présentation Vœux de Nouvel An 2014 à l'Archevêque ★
99. ECC	KOR/Journées catholiques de l'enseignement ★
100. ECC	KOR/Maintenance +
101. ECC	KOR/Education à la vie +
102. ECASJ	KOR/Achat lap-top Président A.K.E./Association du Kasaï-EstX
103. ECASJ	KOR/Contribution Spéciale Ecole +
104. ECC	Jubilé d'or (50 ans) de la Bienheureuse Annuarite Nengapeta +
105. ECC	BC/ Fabrication nouveau cachet pour chaque école ★
106. ECP/CBCO	Journée de la CBCO +
107. ECP/CBCO	Budget CBCO ★
108. ECP/CBCO	Participation logement pasteur de District adjoint Matadi ★
109. ECP/CBCO	Frais des imprimés : a. Elaboration mise en place du personnel 15 brochures ★ b. Rapport d' activité ★ c. Farde fiche + avenant +
110. ECP/CBCO	Achat jeep pour la COPRO ECP/BC ★
111. ECP/CEAC	BC/Appui aux écoles démunies +
112. ECP/CEAC	BC/Invitation à la retraite de prière et de travail ★
113. ECI	Contribution AG extraordinaire COMICO à Kinshasa ★ +
114. NC/SDIV	Activités à réaliser et informations à fournir a. Evaluation éducation pour tous ★ b. Contrôle manuels français et mathématique ★ c. Activités culturelles ★ d. Recensement des élèves vivant avec handicap ★

2. Instructions from FBO s and other education authorities

115. ECK	Opération chaise en plastique nouveau modèle Nkamba ★
116. NC/SDIV	BDD/Organisation d'un jeu concours de culture générale ★
117. ECP/37e CADC	BDD/Terrain ECP/Bdd-ville, Inongo, Kenge et Kikwit ★
118. ECP/37e CADC	BDD/Centre de production et de transformation agricole ★
119. ECP/37e CADC	BDD/Consultation annuelle ★
120. ECP/37e CADC	BDD/Fonds de retraite agents CONAT ★
121. NC/SDIV	BDD/Tableau financier des élèves /SERNIE +
122. NC/PROV	BDD/Jeep PROVED +
123. ECP	Consultation Nationale à Kisangani +
124. ECC	PO/Jubilé Révérend Frère COPRO des ECCATH de la PO ★
125. ECK	PO/Transport et installation nouvelle autorité ECK/Kisangani ★
126. ECC	PO/Contribution Ordination, Fête patronale et Prémices ★
127. ECC	PO/La fête patronale du bureau de la Coordination ♦
128. ECC	PO/La Sainte Enfance missionnaire +
129. ECC/and others	Approvisionnement en fournitures scolaires (Box 9) ★
130. All	MASCO (manuels scolaires/écoles secondaires) ★ +
131. ECC/Kinshasa	Fonds commun de solidarité ★ +
132. All	Achat fiches TENAFEP (FT1, FT3, FT5, FOR1, E01E, E02E etc.)

Source: Directives from FBOs and other education authorities

3. Fees raised at the school level

133.	Teacher salary top-ups
KAT	a. FAP (et FIP (frais d'intervention ponctuelle) +
All	b. Motivation des enseignants +

Box 7: FIP: Allocation formula

(ECC/Eq: Frais d'intervention ponctuelle)

- APEC (réfection des écoles, fabrication de tableaux noirs et des bancs)
- Ecole (maintenance : équipements, latrines, conservation des manuels)
- CODI (formation et entretien des motos)
- COPRO (fret, formation et voyages vers les CODI et CR)
- CR (déplacements de visites d'écoles)

Box 8: FIP: Allocation formula

(ECP 20e CEAC/PO: Frais d'intervention ponctuelle)

Construction :

- 750 FC par élève
 - 5\$ par enseignant
 - 10\$ par Chef d'établissement
 - 15\$ par agent de la Coordination
- Budget communautaire 700 FC/élève
- Prime agents Coordination 150 FC/élève/mois
- Consultation nationale des Coordinateurs 100 FC/an

Source : Compte rendu du Comité d'enseignement de Coordination tenu à Bunia du 29 au 31 juillet 2015

Box 9: Mandatory School Supplies

- Livre de caisse : 5500 FC
- Journal d'activité : 3500 FC
- Journal de classe (primaire et secondaire) : 2500 FC
- Registre de présence : 2000 FC

Source : N°BCD/CD/BUN/EP+ES/CIRC.001/15-16 of September 5 2015: (...) que vous avez l'obligation d'acheter toutes les fournitures et autres documents administratifs au bureau de la Coordination (p.8).

Box 10: Dîme: Allocation formula

ECP/27e Mennonite

(P.V. C.A. of March 12-14, 2015)

- Paroisse : 20%
- District : 20%
- Province : 20%
- Présidence Communautaire : 30%
- Coordination: 5%
- Bureaux Conseillers : 5%

Source: <Insert Notes or Source>

Table 4: Fees decided in GAs

(Example of Maniema province)

Salaire sentinelle +
Ecusson +
Cahier de communication +
Journal de classe +
Construction salles de classe +
Entretien latrines +
Achat terrain école +
Bulletin archive +
Organisation matérielle (ORGAMAT) +
Saisie et impression questionnaire des examens +

Source: School questionnaires 2015-16

Table 5: Rent-seeking practices (NC/Kinshasa)

1.	Purchase of books
SERNAFOR	Guide pratique vie courante ★
IPP	Livre Comment diriger l'école ★
SG/SDIV/Inspool	Loi-cadre ★
DIPROMAD/PROVED/IPP	Recueil de directives et instructions officielles ★
SDIV	Livre Education à la vie ★
PROVED	Connaissance de l'enfant et de l'adolescent ★
Inspool	Module de formation des compétences de la vie courante ★
SDIV	La taxonomie de JS Bloom ★
SDIV	Achat organisation cellule de base ★
SDIV	Technique du bureau ★
IGE	Revue de l'inspecteur ★
Inspool	Programme nationale de l'Ecole Primaire ★
PROVED	Plan Intérimaire de l'Education ★
PROVED	Corruption en milieu scolaire ★
PROVED	La réussite et l'échec scolaire ★
PROVED	La gestion d'une classe ★
Inspool	La gestion d' une école ★
Inspool	Module sur l'approche par compétences ★
Inspool	Guide du maître ★
Inspool	Comment tenir le registre d'appel ★
SDIV	Méthode active et participative ★

Inspool	Cahier de dessin ★
Inspool	Ecole de proximité ★
	Stratégies baconiennes ★
2.	Visitors to the school
PROVED	Contrôle pédagogique ★
PROVED	Réception du nouveau PROVED ★
PROVED	Conseillers PROVED (séance de travail) ★
Inspool	Visite de l' inspecteur (séance de travail) ★
Inspool	Frais de mission ★
3. SDIV	Purchase of school documents
	Plan de travail du Chef d'Etablissement ★
	Bulletin de signalement ★
	Canevas rapport de rentrée/fin d' année scolaire ★
	Couverture du rapport annuel ★
	Rapport scolaire et palmarès ★
	Achat fardes ★
	Formulaire statistique ★
	Calendrier scolaire ★

Source : School questionnaires NC/ Kinshasa 2015-16

3.3 A fee abolition policy in name only

The fee abolition policy has been only partially implemented and with marginal effect. Since school year 2010-11, Governor decrees gradually introduced fee abolition for P1-5 classes. If this seems to be partially implemented³⁰, evidence shows all children (P1-6) continue paying a wide range of fees. These mainly are:

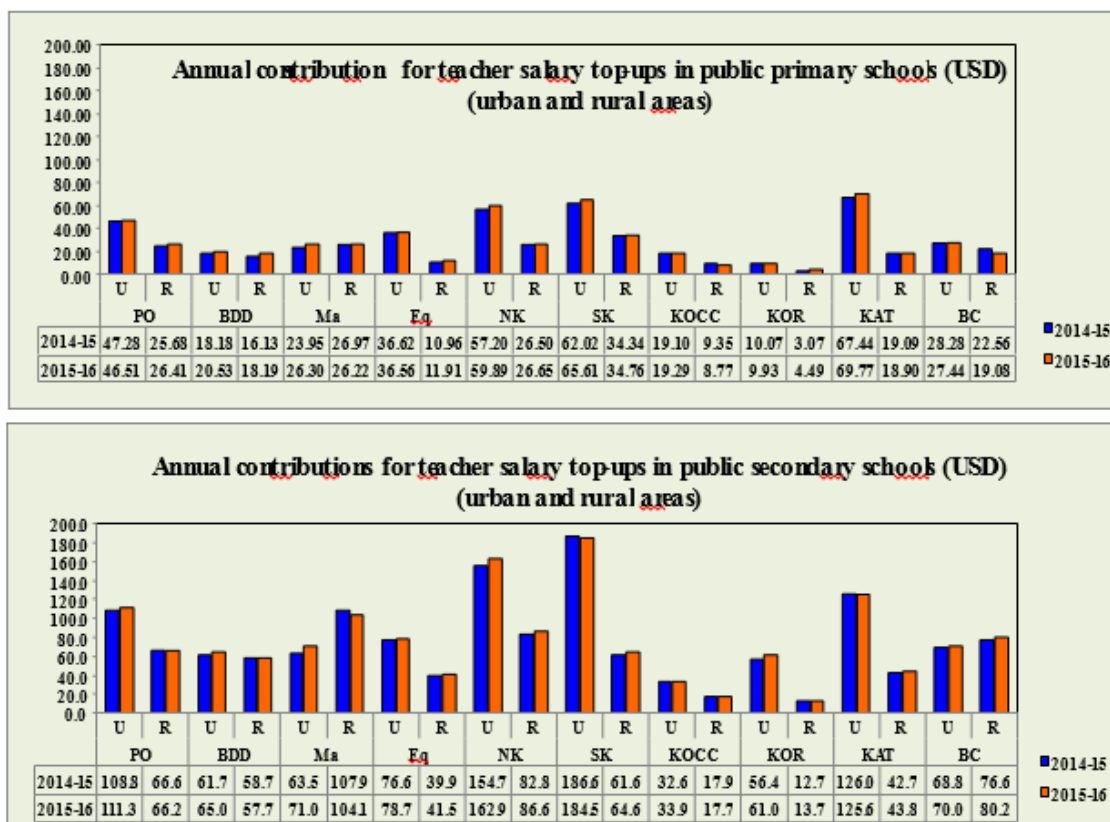
- Household contributions for teacher salary top-ups, decided in GAs of Parents³¹. Findings show widespread practice and major geographic disparities that may have been underestimated in the past, particularly in rural areas³² (**Box 11**). This fee is due every month and places constant stress on children. Non-payment generally leads to children being sent away from school. An example of such daily pressure is the so-called quota system (**Box12**).

³⁰ For instance, Diagram 1. Bas-Congo (Annex I) shows that since 2010-11 P1-5 students progressively started paying less fees. This trend is the same in other provinces.

³¹ Generally called frais de motivation. Other terminology used are frais d'appoint (FAP) in KAT, KOCC; frais d'appui in KOCC, KOR; frais d'interventions ponctuelles (FIP) in Ma, KOR (40% of the frais de scolarité), KAT, KIN, BDD; appui à la qualité de l'éducation in BC; contribution des parents (CP) in Eq, motivation; prime, etc.

³² See for instance, UNICEF-commissioned primary school fee study: Verhaghe J., School fee policy and practice (2007).

Box 11: Estimate of household contributions to teacher salary top-ups (USD) in urban and rural areas



Box 12: Quota System

In Catholic school E.P. Kaseluselu (KAT) 40% of the teachers are not on public payroll. All teachers receive salaries/salary top-ups from the *frais d'intervention ponctuelle* (FIP). The school has put in place a 'quota system' (*système de quota*) for a more effective collection of the FIP. Each teacher manages a dedicated list of 12 students that contribute to his/her salary (12 x CDF3, 000 = CDF 36, 000/ USD25). (SD) Reportedly, this system is in place in all Catholic schools of the Kopolowe mission. Usually, schools make a common pot of the money they collect and divide the amount by the number of teachers. The quota system exerts daily pressure on children. Teachers admit this practice divides them into 'good' and 'bad' payers (*bons et mauvais payeurs*) and affects their school results.

- **Multiple fees collected at all levels.** Despite a fee-free policy for P1-5, education authorities at all levels of the system continue collecting fees from all primary students. These fees are not listed in Governor decrees but collected in parallel. They deepen the financial burden on households and worsen the fragile learning conditions of children. Examples are:

3.3.1 At central MoE level

- In 2014, collection of CDF600 (USD0.66) for the purchase of computer kits at central level (SERNIE)³³ [Income for MoE estimated at USD11.830.000]
- In 2015, collection of CDF1,000 (USD1.08) for the same purpose and renewed annually since then (*frais dus aux opérations d'identification informatisée et maîtrise du cursus des élèves*)³⁴. As per directives, P1-5 classes (*les classes de gratuité*) are exempted. However, on the ground this is not always the case (Box 13) [Income for MoE estimated at USD6.325.000 (P6 and S1-6 combined)]³⁵.
- The fee identification *informatisée de l'élève* (computerised identification of the student) is collected at the initiative of the central MoE/SG. Adding another fee to the list appears incompatible with a fee abolition policy particularly when the same MoE is accountable for regulating and monitoring compliance. Evidence further shows persistent top-down pressure to collect the fee³⁶.

Box 13: Frais d'identification informatisée de l'élève

Evidence from Mbandaka, Equator (2015-16)

As part of a strategy to collect fees more efficiently, the Catholic network (CODI) transmits hand-written 'credit notes' to schools. These notes pre-calculate expected fee income based on the school's enrolment figures. In E.P. Malembe, total enrolment is 910 students (P1-6) of which 155 are in P6.

Note 1 (yellow) lists the fees P6 students will pay, including the *frais d'identification informatisée* (abbreviated fr.id.inf.). This is in conformity with the fee abolition policy that exempts P1-5 students from paying fees. However, Note 2 (red) - that was sent later - replaces and rectifies Note 1. Now, all 950 students (instead of 155) have to pay the *frais d'identification informatisée*.

Notes 1 and 2

Item	Calculation	Amount
FM	155 x 86	13.330
BUL	155 x 323	50.065
FIP	155 x 2.300	356.500
PROJ	155 x 200	31.000
SONAS	155 x 180	27.900
FICH	155 x 890	137.950
CART	155 x 308	47.740
Fr.id.inf.	155 x 1.000	155.000
MINEPS	155 x 50	7.750
SONAS	910 x 800	728.000
BUL (1-5)	755 x 1.500	1.132.500
FICHE	755 x 600	453.000
Total		2.747.715

Item	Calculation	Amount
FM	155 x 86	13.330
BUL	155 x 323	50.065
FIP	155 x 2.300	356.500
PROJ	155 x 200	31.000
SONAS	155 x 180	27.900
FICHE	155 x 890	137.950
CART	155 x 308	47.740
Fr.id.inf.	155 x 1.000	155.000
MINEPS	155 x 50	7.750
SONAS	910 x 800	728.000
BUL	1.155 x 1.500	1.732.500
FICHE	950 x 600	570.000
Total		2.514.735

The notes also indicate P1-5 students continue paying the following fees:

- CDF200 for SONAS (insurance)

³³ Message phonique N° MINEPSP/SG/80/0007/2014 of January 3 2014 (...) *Acquisition de kits informatiques pour l'identification informatisée de tous les élèves de la RDC (...) tous les élèves de tout régime de gestion de toutes les classes sont concernés par lesdits frais.*

³⁴ Note Circulaire N°MINEPS-INC/SG/80/SERNIE/98/4091/2015 of September 28 2015.

³⁵ Calculations based on enrollment figures (MEPSP, Annuaire Statistique 2013-14).

³⁶ Message phonique N°MINEPS-INC/SG/80/SERNIE/98/5215/2015 of November 26 2015, sent out two months after the September note.

- CDF500 for the bulletin (school report)
- CDF600 for the fiche (SERNIE)

3.3.2 At provincial and district levels

A large body of documentation shows non-observance of the fee abolition policy across all networks. This includes government authorities (PROVED, S/PROVED, IPP, Inspool etc.) even if their direct obedience to the central MoE leaves them little room for manoeuvre. The more autonomous FBOs, however, continue raising fees from all students. Examples from 3 provinces (BDD, BC and Eq) provide an idea of the scale (**Annex 2**).

This is likely only to be the tip of the iceberg³⁷. Findings show schools, teachers and HTs have become a major source of income. In particular, schools as institutions are targeted. This allows circumvention of the letter, if not the spirit of fee abolition. The strong grip of FBOs on their HTs and teachers does not give much room for protest and allows the collection of money from schools instead of students.

Estimates show primary schools may contribute more than USD100 per year (BC/ECP CBCO) and individual head teachers up to USD50 (BDD/ECP 37e). Depending on the network, primary students can pay between USD1-8 on top of other fees (Box 14). Examples from the Catholic network (KOCC, SK) show similar practices for ecclesiastic purposes (**Box 15**).

The strong grip of FBOs on their school heads and teachers avoids protest and allows the collection of money from schools instead of students (**Box 14**). Estimates show primary schools may contribute more than USD100 per year (BC/ECP CBCO) and individual Heads up to USD50 (BDD/ECP 37e). Depending on the network, primary students can pay between USD1-8 on top of other fees. Examples from the Catholic network (KOCC, SK) show similar practices for ecclesiastic purposes (**Box 15**).

³⁷ Some 550 notes and letters were collected and analysed but many more could have gone unnoticed.

Box 14: Estimated annual fees (USD) (collected in parallel from students, schools, teachers and HTs)

		Bas-Congo								
		Students		Schools		Teachers		Head teachers		
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary	
2014-15	E CC	P1-6	0.7	0.7	5.4	5.4	3.3	3.3	3.3	3.3
	E CP/CBCO	P1-6	6.7	9.9	107.6	107.6	16.3	16.3	17.9	21.7
	E CP/CEAC	P1-6			46.2	46.2				
	NC	P1-6			3.8	19.6	3.8	3.8		
		Students		Schools		Teachers		Head teachers		
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary	
2015-16	E CC	P6	0.5	0.5	21.5	21.5				
	E CI	P1-6	4.8	4.8	10.8	10.8				

Source: Circular notes from provincial and district education authorities.
Yellow cells indicate when all primary students have to pay.
Computed from Table 6.

		Equator							
		Students		Schools		Teachers		Head teachers	
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary
2014-15	E CK			10.9	10.9				
	FRAT	P1-6	2.6	3.9	78.7	88.0			
		Students		Schools		Teachers		Head teachers	
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary
2015-16	E CP/10e	P6	2.7	2.7	60.0	60.0			
	E CC	P1-6	3.3	3.3					
	FRAT	P1-6	0.8	4.3					
		P6		3.8					
	E CI	P1-6	0.5	0.5					
	NC	P1-6	1.1	1.1					

Source: Circular notes from provincial and district education authorities.
Yellow cells indicate when all primary students have to pay.
Computed from Table 7.

Box 15: Contributions for ecclesiastic purposes

		Bandundu								
		Students		Schools		Teachers		Head teachers		
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary	
2014-15	E CC	P1-6	3.8	4.9	10.0	38.3	13.4	13.4	15.1	15.1
		P5-6	1.1							
	E CK	P1-6	1.0	1.6	10.0	10.0				
	E CP43e	P1-6	1.0	1.6						
	E CPE SE CO	P1-6	4.5	4.5						
	E CP27e	P1-6	0.2	0.2			3.3	3.3	5.4	5.4
	NC	P1-6	0.8	2.7	21.7	27.2				
	P6	1.0	1.0							
		Students		Schools		Teachers		Head teachers		
		Primary	Secondary	Primary	Secondary	Primary	Secondary	Primary	Secondary	
2015-16	E CC	P1-6	2.0	3.2	21.5	43.0	12.9	12.9	19.4	19.4
		P6	3.2							
		P3-5	1.1							
	E CP37e	P1-6	2.3	5.2	46.7	79.6	15.4	15.4	48.9	48.9
	E CP35e	P1-6	1.3	2.2	32.3	32.3	1.1	2.7		
	E CP43e	P1-6	3.6	3.6						
	NC	P1-6	1.3	3.3	1.6	1.6				
		P6	1.6							
	E CK	P1-6	1.9	3.2						

Source: Circular notes from provincial and district education authorities.
Yellow cells indicate when all primary students have to pay.
Computed from Table 5.

Examples from the Catholic network in KOCC and SK

ECC Kasai-Occidental		
Présentation des Voeux de Nouvel An 2014 à Mgr l'Archevêque (Letter from COSPRO of January 21 2014)		
1. Ecole de la Ville	FC	USD
a. Ecole secondaire ayant 2 personnes à sa tête (Préfet et Directeur des Etudes)	30000	32.6
Il s'agit de:		
Collège St Pie X	ITIKA	
Collège St Clément	ITIPKA	
Collège St Louis	Lycée Com. Disuminyina	
Collège St Martin	Lycée Prof. Disuminyina	
Collège St Célestin	Lycée Buena Muntu	
b. Ecole secondaire n'ayant qu'une seule personne à sa tête (Préfet)	26000	28.3
c. Ecole primaire ayant deux personnes à sa tête (Directeur Titulaire et Directeur Adjoint)	22000	23.9
d. Ecole primaire n'ayant qu'une seule personne à sa tête (Directeur)	20000	21.7
2. Ecole de l'intérieur		
a. Ecole secondaire	19800	21.5
b. Ecole primaire	17350	18.9
<i>N.B. Cette somme sera puisée à 50% du montant à contribuer de la prime des enseignants pour les écoles qui la perçoivent et le reste puisé des frais de fonctionnement ou de l'autofinancement.</i>		

ECC Kasai-Occidental		
Fonds d'appui à l'Education Chrétienne (Assemblée provinciale de Kananga ECCATH - March 8-13 2015)		
	FC	USD
Coordinateurs	30000 /an	32.6
Conseiller et chefs d'établissement	20000 /an	21.7
Enseignants	10000 /an	10.9
Elève du secondaire	2000 /an	2.2
Elève du primaire	1500 /an	1.6
Elève de la maternelle	1100 /an	1.2

ECC Sud-Kivu	
Projet CENCO construction d'une Basilique pour le 50ième anniversaire de la mort de la Bienheureuse Annuarite Clémentine NENGAPETA	
<i>(Directives et instructions 2014-2015 - N° MINEPSP/CDP/511/AS/026/2014 of October 20 2014)</i>	
Enseignant	1\$
Ecole rurale	10\$
Ecole urbaine	25\$
Agent du bureau gestionnaire	5\$
"Mois d'octobre = le mois de mission/une collecte sera organisée à l'école et remise au bureau gestionnaire (...) pour la solidarité à travers les Oeuvres Pontificales Missionnaires ".	
<i>(Directives et instructions 2015-2016 - N° MINEPSP/CDP/511/AS/025/2015 of September 18 2015)</i>	

3.3.3 At school level

Schools may decide to raise fees for specific purposes and usually all children pay. Minutes from GAs of Parents allow listing the most common fees³⁸ (e.g., construction and rehabilitation of classrooms, maintenance of toilets, repair of desks, salaries for guards (sentinelle) and teachers not on public payroll (nouvelles unités), sport activities, etc.).

Large variations exist across schools. The extra cost for most households fluctuates between USD1-7. (Box 16). In-kind contributions are common practice, particularly in urban centres (e.g., rolls of toilet paper, paper reams, brooms, etc.). Big urban schools may ask contributions for cultural activities (*activités culturelles*), computer maintenance (*maintenance des machines*), mentoring and tutoring (*cours d'encadrement, rattrapage scolaire*), entry tests (*frais de participation au test d'inscription*), and so on.

Box 16: Annual school fees decided at the school level

	CDF	USD
EP Kulungu/BDD		
• Construction 2ième bâtiment scolaire	15,000	16.3
• Salaire nouvelle unité (N.U.)	9,000	9.8
• Salaire sentinelle	6,000	6.5
EP Tabernacle/Ma		
• Frais construction salle de classe	5,000	5.4
• Frais sentinelle	1,000	1.1
• Frais maintenance	1,500	1.6
EP Kituba 2/LUB		
• 2 mamans pour nettoyer salles de classe, etc.	5,000	5.4
EP Dianjilayi Penu/KOR		
• Réhabilitation salle de classe	6,000	6.5

Source: <Insert Notes or Source>

³⁸ These do not include contributions for teacher salary top-ups. Schools are primary schools only and were randomly selected for school year 2015-16.

3.3.4 Quantifying the burden of school fees

Between 2010-16 school fees have doubled in primary and almost tripled in secondary schools (Tables 6 and 7). Since the start of fee abolition (2010) education authorities across the system have tried to recuperate what they call *le manque à gagner* (loss of profit). Higher fees were rapidly introduced in upper primary classes and secondary schools to compensate shortfalls. The gradual implementation of fee abolition (classes P1-3 in 2010-11, P4 in 2011-12 and P5 in 2012-13) appears to have amplified the existing trend of annual increases. This substantiates the premise that without adequate public financing school fees will persist and the system will continue to be self-perpetuating.

Average annual school fees per student in 2015-16 in fee abolition zones³⁹ (Table 6) are estimated at:

Table 11

<ul style="list-style-type: none"> ● Primary <ul style="list-style-type: none"> – P1-5 classes, USD39 (urban) and USD20 (rural) – P6 classes, USD59 (urban) and USD38 (rural) ● Secondary <ul style="list-style-type: none"> – S1-5 classes, USD119 (urban) and USD76 (rural) – S6 class, USD166 (urban) and USD87 (rural) ● Secondary TVET <ul style="list-style-type: none"> – S1-5 classes, USD130 (urban) and USD87 rural) – S6 class, USD177 (urban) and USD135 (rural)

Source: <Insert Notes or Source>

As Table 7 below shows, in Kinshasa and Lubumbashi (not fee-free), school fee levels appear twice as high as elsewhere in the DRC. In P1-5 classes, they are 3 to 4 times higher.

Table 7

Kinshasa	Lubumbashi
<ul style="list-style-type: none"> ● Primary <ul style="list-style-type: none"> – P1-5 classes, USD95 – P6 class, USD103 ● Secondary <ul style="list-style-type: none"> – S1-5 classes, USD211 – S6 class, USD254 ● Secondary TVET <ul style="list-style-type: none"> – S1-5 classes, USD231 – S6 class, USD274 	<ul style="list-style-type: none"> ● Primary <ul style="list-style-type: none"> – P1-5 classes, USD116 – P6 class, USD126 ● Secondary <ul style="list-style-type: none"> – S1-5 classes, USD216 – S6 class, USD242 ● Secondary TVET <ul style="list-style-type: none"> – S1-5 classes, USD259 – S6 class, USD285

These average school fees (2014-16) have been computed from Governor decrees and estimates of household contributions for teacher salary top-ups that are both well documented. Fees raised in parallel are not included because of their relative volume and scope that remain hard to

³⁹ All provinces, except Kinshasa (ville-province) and the town of Lubumbashi.

quantify. Depending on the network and the local school fee policy, their average additional cost is estimated at USD3-6 per student across all grades (from P1 to S6).

Tables 8 and 9. Average annual school fees per student (USD) (parallel fees raised by FBOs and schools are not included)

Average annual school fees per student (USD) (2008-12)					Average annual school fees per student (USD) Fee-free zones (2014-16)			Average annual school fees per student (USD) (Kinshasa and Lubumbashi)			
					2014-15		2015-16		2014-15		2015-16
P1-5					P1-5			P1-5			
	2008-9	2009-10	2010-11	2011-12	urban	37.0	38.7	Kinshasa	91.6	95.2	
average	15.7	16.8	14.3	14.0	rural	20.1	20.1	Lubumbashi	114.3	115.6	
P6					P6			P6			
average	19.4	21.1	22.2	24.1	urban	57.7	59.3	Kinshasa	95.4	102.8	
S1-5					S1-5			S1-5			
average	23.0	34.6	36.4	41.3	rural	38.5	38.3	Lubumbashi	123.0	126.5	
S6					S6			S6			
average	43.0	63.8	66.8	74.3	average	96.6	97.5	Kinshasa	204.7	210.7	
TVET S1-5					TVET S1-5			TVET S1-5			
average	27.5	39.1	40.3	46.3	urban	123.2	129.6	Lubumbashi	209.6	215.8	
TVET 6					TVET 6			TVET 6			
average	47.5	68.2	70.7	79.3	rural	82.0	87.4	Kinshasa	246.5	253.8	
					average	102.6	108.5	Lubumbashi	252.3	241.6	
					urban	171.9	177.3				
					rural	130.7	135.1				
					average	151.3	156.2				

Source: World Bank (2015). PAD DRC: Quality and relevance of secondary and tertiary education project, p.96.
Note: Yellow cells indicate comparable averages.

Source: Governor decrees and estimates of household contributions for salary top-ups. Computed by author.
Kinshasa and Lubumbashi are not fee-free

3.3.5 Structure of fees

Contributions for salary top-ups are the highest fee. In P1-5, they correspond to 90% of total fees; in P6, they vary from 65% (urban) to 50% (rural). In secondary schools, they constitute half of the total school fee cost.

National exams are the second highest fee. For P6 students, the (T) ENAFEP represents about one fifth of total cost; in S6 classes, the *Examen d'Etat* almost one third. Previous research estimates 8% of P6 (T) ENAFEP candidates cannot sit the exam because of the high cost⁴⁰. In 2015, this represented some 100,000 children.

⁴⁰ World Bank (2015). Project Appraisal Document DRC: Quality and relevance of secondary and tertiary education project, pp.96-7.

The (T) ENAFEP is a good gauge for overall trends and dynamics⁴¹. Since 2009, the fee has tripled (from USD3 to USD9)⁴² (**Table 10**). The high cost of the (T) ENAFEP has been questioned in the past⁴³, mainly because 80% of income is spent on incentives (against only 5% for printing). Lack of transparency on the use of the (T) ENAFEP budget line in the MoE budget is an additional matter of concern. This also applies to the use of 10% revenue allocated to the *Comité National*⁴⁴. In 2015, this share augmented to 13%⁴⁵. Under the title *Appui à la hiérarchie* (support to the hierarchy) 3% more was allocated to the Cabinet of the Minister of Education⁴⁶. Behavior patterns around the (T) ENAFEP are emblematic of the major flaws that characterise the DRC school fee landscape. These are:

- Substantial annual increases (in USD) not documented for relevance
- Opaque use of resources, mainly spent on incentive payments to individuals
- Noncompliance with neither the letter or the spirit of the fee abolition policy, including from the MoE that acts as regulating and supervising authority.

Table 10: (T)ENAFEP fee (USD) (2009-2016)

<i>Province</i>	2009	2010	2015	2016
KIN	2.6	3.9	3.8	7.6
BDD	3.2	4.4	14.1	11.6
BC	3.9	5.0	9.8	9.7
E _q	1.9	2.2	10.9	10.9
KOCC	2.6	3.3	7.6	7.5
KOR	4.3	3.9	7.6	7.5
KAT	3.9	6.1	10.9	13.4
Ma	3.9	3.5	8.2	8.1
NK	3.6	3.7	8.7	8.6
SK	3.0	3.0	8.7	8.6
PO	3.2	2.8	5.4	5.9
<i>Average</i>	3.3	3.8	8.7	9.0

The table in **Annex 4** provides a detailed breakdown of annual school fees for primary secondary and TVET schools for 2014-15 and 2015-16, disaggregated by province and urban and rural settings.

In 2014-15, total annual household financing of the education sector (MEPSP) is estimated at USD843 million of which 45% was for primary education (**Table 11**). This amount is likely to be underestimated, as it does not include the wide range of fees raised in parallel, including those collected in schools for specific purposes and not automatically renewed every year. A reasonable estimate of their cost would increase total household contributions by USD50-100 million. Since 2010, the cost per student (i.e. total household financing divided by the number of students) has doubled (from USD16 to USD 29 for primary and USD55 to USD112 for secondary) and corroborates overall increase of school fees for the same period. Costs of uniform and basic

⁴¹ This applies mutatis mutandis to the Examen d'Etat.

⁴² The *Examen d'Etat* fee almost doubled (from USD30 to USD50).

⁴³ Verhaghe J. (2007) School fee policy and practice in the DRC (p.). In 2007, the MoE established a maximum amount of CDF1, 000 (USD2) for the TENAFEP that remained a dead letter (cf. Inter-ministerial decree N°MINEPSP/CABMIN/306/2007 of October 9 2007).

⁴⁴ Before 2015, the breakdown of revenue (recettes) from the TENAFEP fee was 10% Echelon national, 17% Echelon provincial, 70% Echelon Sous/provincial and 3% for the school.

⁴⁵ IGE, Instructions relatives à l'organisation technique de l'Examen National de Fin d'Etudes Primaires 2015 of March 17 2015. Annexe 2. Clef de répartition des frais de participation à l'ENAFEP (March 30 2015). In 2015, 3% roughly corresponds to USD350, 000.

⁴⁶ Other beneficiaries include the SG 'et partenaires' (3%) and the IGE (3%).

school supplies (such as notebooks and pens) are not included and have been estimated in the past⁴⁷. In urban centres (KIN, LUB) their cost can be substantial⁴⁸

Table 11. Estimated household financing of primary and secondary education (2009-12 and 2014-16) (USD)

	2009-10	2010-11	2011-12	2014-15	2015-16
Household financing (USD, millions)					
Primary	173.8	158.5	171.6	352.9	384.9
Secondary	143.2	158.7	182.4	422.7	458.2
Total	317.0	317.2	354.0	775.6	843.1
Total number of students (millions)					
Primary	9.4	9.8	10.7	12.6	13.4
Secondary	2.9	3.1	3.3	3.8	4.1
Cost per student (USD)					
Primary	18.5	16.2	16.0	28.0	28.7
Secondary	49.4	51.2	55.3	111.2	111.8

Sources:

Period 2009-12:

a. Verhaghe J. (2013). *La gratuité de l'enseignement primaire en RDC face aux défis structurels, Congo-Afrique, N°478, pp.578-598.*

b. *La Banque mondiale (2013) Rapport de suivi de la situation économique et financière pour la RDC, p.28.*

Period 2014-16:

Governor decrees, estimates of household contributions for teacher salary top-ups. Computed by author.

Number of students: MEPSA. Annuaire statistiques. Projections for 2014-16 computed by author.

Source: <Insert Notes or Source>

3.4 The school fee process

Setting fees

At national, provincial, and FBO-levels, school fee policies are the result of a mechanical collection process that is not related to costed work plans and planned results.

3.4.1 Central MoE level.

Only few fees are decided at central level. Instructions are reproduced annually, transmitted to provinces, and integrated into local school fee policies. Since the 'no-fee' policy was introduced in 2010-11, the MoE has had the role of regulating and monitoring authority for implementing school fee abolition and might be expected to play by these rules. Evidence shows this is not always the case and non-compliance with the fee abolition policy has been observed (e.g., *frais d'identification informatisée de l'élève*, share of 3% from the TENAFEP). The *minerval* fee (CDF100) falls under the authority of the MoE (*Loi-Cadre* 2014, Art. 177). One year after fee abolition (P1-4) the MoE decided to double the *minerval* (from CDF50 to CDF100) to make up for

⁴⁷ These are not school fees. Average costs are: uniform (USD10), school supplies USD10 (rural) and USD7 (urban). (Verhaghe J. (2013). *La gratuité de l'enseignement primaire en RDC face aux défis structurels, Congo-Afrique, N°478, pp.578-598.*)

⁴⁸ Cf. Billets de vacances (KIN, LUB) that provide list of school supplies.

the loss of profit (*le manque à gagner*). The *minerval* is one of the fees collected in an efficient way⁴⁹ generating substantial revenue. (Table 12)

Table 12. Estimated income from the *minerval* (USD) (2012-2017)

	2009-10	2010-11	2011-12	2014-15	2015-16
Household financing (USD, millions)					
<i>Primary</i>	173.8	158.5	171.6	352.9	384.9
<i>Secondary</i>	143.2	158.7	182.4	422.7	458.2
Total	317.0	317.2	354.0	775.6	843.1
Total number of students (millions)					
<i>Primary</i>	9.4	9.8	10.7	12.6	13.4
<i>Secondary</i>	2.9	3.1	3.3	3.8	4.1
Cost per student (USD)					
<i>Primary</i>	18.5	16.2	16.0	28.0	28.7
<i>Secondary</i>	49.4	51.2	55.3	111.2	111.8

Sources:

Period 2009-12:

a. Verhaghe J. (2013). *La gratuité de l'enseignement primaire en RDC face aux défis structurels, Congo-Afrique, N°478, pp.578-598.*

b. *La Banque mondiale (2013) Rapport de suivi de la situation économique et financière pour la RDC, p.28.*

Period 2014-16:

Governor decrees, estimates of household contributions for teacher salary top-ups. Computed by author.

Number of students: MEPSA. *Annuaire statistique. Projections for 2014-16 computed by author.*

	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17
Public schools						
P5-6						
<i>Enrollment (millions)</i>	2.45	(na)	(na)	(na)	(na)	(na)
<i>Cost of minerval (USD)</i>	0.1	0.1	0.1	0.1	0.1	0.1
<i>Estimated income (USD)</i>	245,000	0	0	0	0	0
P6						
<i>Enrollment (millions)</i>	(na)	1.14	1.25	1.33	1.42	1.50
<i>Cost of minerval (USD)</i>	0.1	0.1	0.1	0.1	0.1	0.1
<i>Estimated income (USD)</i>	(na)	114,000	125,000	133,000	142,000	150,000
S1-6						
<i>Enrollment (millions)</i>	3.31	3.33	3.58	3.83	4.11	4.40
<i>Cost of minerval (USD)</i>	0.1	0.1	0.1	0.1	0.1	0.1
<i>Estimated income (USD)</i>	331,000	333,000	358,000	383,000	411,000	440,000
Total estimated income public (USD)	576,000	447,000	483,000	516,000	553,000	590,000
Private schools						
P1-6						
<i>Enrollment (millions)</i>	1.27	1.41	1.70	1.97	2.20	2.55
<i>Cost of minerval (USD)</i>	0.1	0.1	0.1	0.1	0.1	0.1
<i>Estimated income (USD)</i>	127,000	141,000	170,000	197,000	220,000	255,000
S1-6						
<i>Enrollment (millions)</i>	0.58	0.66	0.81	0.96	1.13	1.34
<i>Cost of minerval (USD)</i>	0.1	0.1	0.1	0.1	0.1	0.1
<i>Estimated income (USD)</i>	58,000	66,000	81,000	96,000	113,000	134,000
Total estimated income private (USD)	185,000	207,000	251,000	293,000	333,000	389,000
Total General (USD)	761,000	654,000	734,000	809,000	886,000	979,000

Source: MoE decree on school fees; Governor decrees on school fees; MEPSA. *Annuaire statistique (2011-14) Projections 2014-17 computed by author.*

⁴⁹ SECOPE collects the minerval on behalf of the Fonds de Promotion de l'Éducation Nationale (FPEN). Substantial evidence of payment receipts in schools and wire transfers to central level (using bank accounts or money transfer agencies) shows an efficient collection method.

3.4.2 Provincial level.

MEPSP provincial committees⁵⁰ meet at the start of the school year to discuss their school fee policy. Meetings are generally convened at the initiative of the PROVED or the provincial MoE. Reportedly, not all members are invited. This was, for example, the case for INGOs (BC, KAT, KOR) and teacher unions (SK). In Equator, only a select committee met in 2014-15 and FBOs were excluded. This may indicate that not all members are welcome and dissident voices are pushed aside. Members acknowledge the unbalanced composition of MEPSP committees where non-state actors are heavily under-represented. However, all members⁵¹ in one way or the other benefit from the school fee system. They have a clear conflict of interest, because their decisions affect their incomes.

Practices for setting fees are similar in all provinces and are a mechanical process, in which activities and their costs are not discussed. The previous year's fees are reviewed on the basis of market prices only (dollar exchange rate) (*conjuncture actuelle, coût de la vie, prix sur le marché*) and what is called *réalités locales* (ground realities) (**Box 17**). Annual work plans and corresponding budgets do not exist. In Mbandaka (Eq), UNICEF started declining invitations because 'they talk to a brick wall and nothing ever changes'. The result is a lack of clarity on fee levels, terminology⁵² and allocation formulae for a wide range of beneficiaries (*clé de répartition*). Generally, Governors do not oppose proposals submitted by the MEPSP provincial committee.

Box 17. Criteria for setting fees at provincial level

Ma	<ul style="list-style-type: none"> « La Commission se base sur la note circulaire (MINEPS-INC/CABMIN/002/2015 du 9 juin 2015) et sur les réalités de la province »
BC	<ul style="list-style-type: none"> « La Commission se base sur la ligne de conduite du ministère national en tenant compte des réalités conjoncturelles de terrain »
KOR	<ul style="list-style-type: none"> « Trois critères: 1. Frais sont fixés compte tenu de la conjuncture ; 2. Evolution des prix sur le marché ; 3. L'économie de la province et sa stabilisation macro-économique » « Il n'existe pas un programme d'action provinciale budgétisé » « La commission tient compte de la politique du Gouvernement sur la gratuité » « Je n'ai pas encore entendu parler d'un quelconque plan d'action budgétisé au niveau de la province » « On se base sur le coût de la vie » « La Commission se base également sur les arrêtés des années antérieures » « On voit l'indice des prix sur le marché. Lorsque c'est stable on reconduit les frais et lorsque le prix monte on revoit à la hausse »
EQ	<ul style="list-style-type: none"> « On se base sur la nomenclature provenant de Kinshasa, les prix sur le marché et l'arrêté de l'année précédente » « Le coût des fournitures de base sur le marché local » « Pas un programme d'action provinciale budgétisé » « La Commission ne tient pas compte de la gratuité »

⁵⁰ Restructured in 2007. Members are: PROVED, IPP, SECOPE, COPROs, Syndicats (teacher unions), Parent Associations, Private school representatives and INGOs operational in the province (Ministerial decree N°MINEPSP/CABMIN/342/2007 of November 16 2007).

⁵¹ Except teacher unions, although in some provinces (KAT, PO) they take a percentage of the school fees.

⁵² Cf. the introduction of new fees (such as Fonds provincial pour l'éducation (FOPED), Fonds provincial de l'éducation (FPE), etc.) that are not clarified.

3.4.3 FBO level.

FBOs collect additional fees from schools, although some do not admit they charge extra fees, despite evidence to the contrary. Interviews with local education authorities allow us to summarise some of the main motives FBOs use to defend their school fee practices. (**Box 18**)

Box 18: FBO justification for collecting fees

<p>Lack of operating costs</p> <ul style="list-style-type: none"> ● <u>Ma/Adventiste du 7è jour</u>. Pour suppléer aux frais scolaires insuffisants fixés par le Gouvernement. Les FIP sont autorisés par l'Arrêté ministériel N° 006/97 du 13-8-1997 à son article 10. (*) ● <u>Ma/CODI/ECC</u>. Suppléer à certaines dépenses du bureau. Etant donné la modicité des frais de fonctionnement alloués au bureau, on est obligé de recourir aux écoles. ● <u>EQ/ECI</u>. Insuffisance des frais de fonctionnement des bureaux gestionnaires. <p>Construction purposes</p> <ul style="list-style-type: none"> ● <u>BC/ECC</u>. Frais versés à l'église pour appuyer des projets de construction et de réhabilitation de certaines écoles. Les rapports financiers de la Coordination diocésaine sont envoyés aux écoles (directions et APEC scolaires). <p>Ecclesiastic purposes</p> <ul style="list-style-type: none"> ● <u>BC/CEC</u>. Aider l'église qui traverse des difficultés (dîme des enseignants une fois l'an). (Box 8) Tout enseignant chez nous est chrétien et doit payer sa dîme. Dans les AG les directeurs expliquent tout. (*) ● <u>KOCC/CPKP</u>. Pour un besoin pressant de l'Eglise. ● <u>EQ/ECI</u>. Contribuer à l'épanouissement de l'Eglise. ● <u>SK/CEBC</u>. 10\$ pour nous aider à construire l'église locale et 2\$ par mois pour le fonctionnement de l'église. Nous sensibilisons les parents et les enseignants et nous rendons compte aux COPA. <p>Support to schools</p> <ul style="list-style-type: none"> ● <u>Eq/ECC</u>. Des frais supplémentaires permettent de réaliser des dépenses non couvertes par les frais de l'AG et aussi pour uniformiser les frais dans nos écoles. Les frais tels que les FIP (3000 FC/an) peuvent couvrir les frais de conservation des manuels scolaires (armoires) - refaire des bancs, tableaux noirs etc. ● <u>EQ/ECI</u>. Envisager la réhabilitation et la construction de bâtiments scolaires.
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Source: Interviews with education authorities: COPROs (9), S/COPROs (8) - including CCs and CODI - and CR s (5).

(*) This is an erroneous reading of the FIP but shows the complexity of the school fee nomenclature. Tithes (*dîmes*) are collected in the same way and for different purposes.

The question of additional fees is generally raised during ad-hoc meetings that gather FBOs, HTs and parents (**Box 19**). These parents may come from local school committees (COPA) or represent Parent Associations.

The imperious way FBOs exercise authority on their schools is well documented (**Boxes 20-23**) and provides grounds for believing HTs have little room for resistance of protest. Reportedly, some meetings take the form of oral communications only. HTs have the unpleasant task of communicating fees to parents and ensuring they pay (*les gestionnaires sont au niveau de la prise des décisions mais l'application revient aux Chefs d'établissement*). Ample evidence shows the high pressure FBOs place on HTs and schools for the collection of fees. Some FBOs claim providing feedback to schools and parents on the use of resources (**Box 20**, highlighted in yellow); some may produce financial reports for internal use. However, observations made at provincial levels are mutatis mutandis applicable to FBOs - work plans and budgets that could justify the relevance and level of fees are not communicated.

Box 19: Participants in FBO meetings on School Fees

<p>Ma</p> <ul style="list-style-type: none"> ● CP/CEPAC 8è « Réunions avec les CE »

- CP/CLMK 24è « Nous intéressons d'abord l'église, ensuite les CE et aussi les parents (APEP) et les CE informent les parents »
- CP/CADAF 34è « Nous invitons les CE pour en discuter »

KOCC

- ECK/ « Réunion entre COPRO, COSPRO et CE »
- ECC/ « Réunion COPRO et CODI (sans CE) »

EQ

- COPRO ECP/ « Réunion des coordinateurs communautaires (CC), COPRO, parents et syndicats »
- COPRO ECC/ « Réunion entre CODI, APEC et le représentant des enseignants »
- ECI/ « Réunion entre COPRO, COSPRO et CE »

SK

- CP/CEBC 55è « Réunion Coordinateur avec le Chef du personnel, conseillers et comptable »

Source: Interviews with education authorities: COPROs (9), S/COPROs (8) - including CCs and CODI - and CR (5).

CE = Chef d'établissement; COPRO = Coordinateur provincial; CR = Conseiller résident;

CODI = Coordinateur diocésain.

3.4.4 School level

In schools, established institutional structures and practices provide grounds for building a transparent local school fee policy. All schools convene GAs of Parents at the start of the school year and keep records of minutes that have signed attendance lists⁵³. Discussion topics primarily focus on financial challenges and what parents are willing to pay to address them. These are mainly support for teacher salary top-ups and recurrent costs and - less frequently - one-off requests to meet specific needs. Recurrent expenses may include latrine maintenance (*entretien des toilettes, mamans nettoyeurs*) or salaries for guards (*sentinelles*) and teachers that are not on public payroll. One-off interventions usually take the form of works (*travaux*) such as classroom construction or renovation, roof or desk repair, etc. that have an urgent character.

Interviews⁵⁴ confirmed that teacher salaries are number-one priority in all schools. Parents perceive support to teachers as the most onerous fee, collected every month and therefore placing constant pressure on family budgets. In primary schools, the (T) ENAFEP is quoted as the second highest cost.

GA minutes generally record discussion details and provide reasoned justification for decisions. Year-end GA meetings, however, do not happen regularly and few share reports on annual income and spending. Lack of transparency is one of the reasons parents are unaware of what teachers earn and how much their salaries are topped-up. Many remain totally ignorant of the fees they pay to the authorities (including FBOs) and for what purpose. Despite the fact that GAs have overarching authority on COPA/COGES, only 60% of parents and teachers seem to be aware of this and 20% continue according predominance to COGES/COPA committees⁵⁵. COGES/COPA are often criticised for being co-opted (*COGES existe de nom seulement et la direction scolaire ne leur rend pas compte*. Equateur). Reportedly 50% of COPA/COGES may receive financial compensation for their work (**Table 13**). This compromises their independence.

⁵³ Evidence based on some 200 minutes of GAs of Parents collected in schools (all provinces).

⁵⁴ Some 550 interviews conducted with HTs, teachers and parents in all provinces.

⁵⁵ The remaining 20% sees complementarity between GA, COGES and COPA and are of opinion they are of equivalent importance.

Generally, GAs, COPAs and COGES operate in a compartmentalised way and their inter-dependence and interaction is not put into practice. For example, COPAs are elected in GAs but do not report back; COGES do not communicate with COPAs and GAs. However, because they are institutionally embedded in schools, they offer grounds for building local accountability mechanisms.

Table 13. Financial privileges of COPA/COGES members (2014-16)

Privileges	%
Gratuité. Members do not pay any school fees.	25%
Compensation financière. A range of financial advantages (e.g., sitting allowances (<i>jeton de présence</i>), a percentage on teacher salary top-ups or works done under their supervision, etc.).	18%
Moitié des frais demandés. Members pay only half of total fees.	10%
Gratuité frais de motivation. Members do not pay the contribution for teacher salary top-ups.	42%
Un enfant gratuit. Members do not pay school fees for one child.	5%

Source: Questionnaires administered to HTs, teachers and parents

Box 20: Roles of GAs, COPAS, and COGES

<p>GA</p> <ul style="list-style-type: none"> ● Elire les représentants des parents (COPA) ● Organe suprême qui décide en dernier ressort ● Donner la position en matière de FIP ● Décider sur les frais additionnels ● Organe de conception des besoins de l'école <p>COPA</p> <ul style="list-style-type: none"> ● Pont entre école et les parents ● L'œil et l'oreille des parents ● Prend les plaintes des parents ● Amener les préoccupations à l'AG ● Faire suivre les décisions de l'AG <p>COGES</p> <ul style="list-style-type: none"> ● Gestion financière de l'école ● Gestion des fonds alloués à l'école ● L'œil des enseignants et de l'école pour les finances ● Gère ensemble avec le CE

3.5 Distribution of fees

Multiple beneficiaries collect their share of school fees following elaborate allocation formulae. (Tables 14-20) Part of the school fees stays in schools and is spent locally. These are essentially operating costs and payments of teacher salary top-ups. The rest flows upwards beyond school flowing through many channels that reach all administrative levels, all networks and, for FBOs, the church behind the network. All fees have designated allocation keys and serve a variety of beneficiaries.

In schools, collection and distribution of cash has grown into a daily activity. This not only relates to the collection of fees from students but also to the constant coming and going of education officials to collect fees from schools. This is particularly the case for urban schools that are located in the vicinity of administrative offices. Every visit generates additional costs, such as transport.

Additional fees (i.e. fees not listed in Governor decrees) can be a considerable burden on schools and parents (**Table 14-15**) and the frequency of the visits may go unabated.

Tables 14-15. Additional fees collected in Kinshasa (USD)

Date	Purpose	Authority	Amount (CDF)	Amount (USD)
6/10/14	10 calendriers scolaires	ECK	5,000	5.5
8/10/14	Solidarité communautaire/septembre	ECK	24,000	26
20/10/14	Tête une septembre 2014	ECK	4,000	4.5
20/10/14	Effort supplémentaire	ECK	1,000	1
3/11/14	Fiche collecte données statistiques	S/D	2,500	2.5
4/11/14	Fête du 25 mai Nkamba (*)	ECK	18,400	20
4/11/14	Effort supplémentaire	ECK	6,000	6.5
12/11/14	Effort supplémentaire	ECK	3,000	3
12/11/14	Solidarité communautaire/octobre	ECK	24,000	26
20/11/14	Supervision des activités scolaires	Inspool	5,800	6.5
11/12/14	Tête une/novembre et décembre 2014	ECK	6,000	6.5
12/12/14	MAECK mutuelle	ECK	12,000	13
12/12/14	Solidarité communautaire/novembre	ECK	24,000	26
12/12/14	Fête du 25 mai Nkamba	ECK	18,400	20
17/1/15	Solidarité communautaire/décembre	ECK	22,000	24
4/2/15	Souveraineté	ECK	10,000	11
11/2/15	Tête une	ECK	4,000	4.5
13/2/15	Supervision des activités scolaires	Inspool	5,000	5.5
23/2/15	Contrôle physique transport	SECOPE	5,000	5.5
3/3/15	Travaux sectoriels	ECK	15,000	16.5
24/3/15	Solidarité communautaire/janvier	ECK	22,000	24
24/3/15	Deuil Pr Charles K.	ECK	3,000	3
22/4/15	Fête du 25 mai Nkamba	ECK	15,000	16.5
2/5/15	Supervision des activités scolaires	Inspool	3,000	3

Date	Purpose	Authority	Amount (CDF)	Amount (USD)
21/5/15	Supervision des activités scolaires	Inspool	3,600	4
22/5/15	Opération 10\$	ECK	73,600	80
2/7/15	Souveraineté	ECK	10,000	11
Total				422

Source: Kimbanguist school, Kinshasa.

(*) The spiritual headquarters of the Kimbanguist church are located in the Holy City of Nkamba.

Tables 16-21. Allocation formulae in Kinshasa (2014-16)

Explanatory note:

- “Frais Kimbuta”. Provincial fees collected in all schools. In ECC and ECK schools they are collected separately and come on top of other fees.
- Kimbanguist network. Model computed from information collected in Kimbanguist schools. These may slightly vary from school to school. Allocation keys are communicated orally (see picture above).
- Catholic network. 20% goes to the Fonds Commun de Solidarité (Box 26).

Protestant, Islamic and state-run networks do not have uniform allocation schemes. The examples are based on data collected from schools. The part allocated to teacher salary top-ups (highlighted in yellow) may vary between 45%-75%. (*)

In the Protestant network, the share of the bureaux gestionnaires (BG) is regulated (see picture below).

(*) Percentages between brackets indicate these are indicative examples that may differ from one school to another.

Date	Purpose	Amount (CDF)	Amount (USD)
6/1/15	<i>D.H.</i>	10,000	11
10/1/15	<i>D.H.</i>	50,000	54.5
14/1/15	<i>D.H.</i>	60,000	65
2/2/15	<i>D.H.</i>	40,000	32.5
4/2/15	<i>D.H.</i>	60,000	65
2/3/15	<i>D.H.</i>	30,000	32.5
19/3/15	<i>Cas de décès</i>	25,000	26
19/3/15	<i>D.H.</i>	40,000	32.5
20/3/15	<i>D.H.</i>	15,000	16.5
23/3/15	<i>D.H.</i>	15,000	16.5
31/3/15	<i>D.H.</i>	20,000	22
29/5/15	<i>D.H.</i>	200,000	217.5
2/6/15	<i>D.H.</i>	102,500	111.5
11/6/15	<i>D.H.</i>	125,000	136
11/6/15	<i>Solidarité</i>	50,000	54.5
Total			877

Source: Kimbanguist school in Kinshasa.

D.H. = Demande de la hiérarchie

Date	Transport	Amount
05/11/14	Chef d'Antenne SECOPE	1,000
05/11/14	Agent SECOPE	1,000
10/11/14	Agents SERNIE	2,000
13/11/14	Conseiller W.	2,000
13/11/14	Conseiller S/D	500
26/11/14	Conseiller S.	1,000
26/11/14	Inspecteur Itinérant	1,000
28/11/14	Inspool et sa suite	5,000
28/11/14	Agent SERNIE	1,000
3/12/14	Agent S/D	1,000
8/12/14	Agent SERNIE	1,000
8/12/14	Agent S/D	1,000
8/12/14	Agent SECOPE.	1,000
2/6/15	Agent S/D	1,000

Table 16. Payments for transportation (CDF) (see picture above)

Date	Transport	Amount
5/11/14	Chef d'Antenne SECOPE	1,000
	Agent SECOPE	1,000
10/11/14	Agents SERNIE	2,000
13/11/14	Conseiller W.	2,000
	Conseiller S/D	500
26/11/14	Conseiller S.	1,000
	Inspecteur Itinérant	1,000
28/11/14	Inspool et sa suite	5,000
	Agent SERNIE	1,000
3/12/14	Agent S/D	1,000
8/12/14	Agent SERNIE	1,000
	Agent S/D	1,000
	Agent SECOPE.	1,000
2/6/15	Agent S/D	1,000

Source: School in Kinshasa

Kimbanguist network

Motivation des enseignants (FIP)	65%	
Bureaux gestionnaires	25%	
Fonctionnement école	10%	

Detailed breakdown

☐ **Fonctionnement école**

FF école	8%	
Travaux école	2%	10.5% School
COPA	0.5%	

☐ **Bureaux gestionnaires (church included)**

CP	4%	
CD	3.5%	
CONAT	2.5%	11% BG
APEKI	1%	

☐ **Eglise locale**

Eglise locale	0.5%	
Ville	0.5%	
Collège	0.5%	13.5% Church
Travaux sectoriels	4%	
Le 25 mai (Noël)	3%	
Souveraineté	5%	

Source: Kimbanguist school in Kinshasa (no # book)
Legend:
Motivation des enseignants = teacher salary top-ups
Bureaux gestionnaires (BG) = administrative offices
Frais de fonctionnement (FF) = operating costs
CP = Coordination provinciale; CD = Coordination de District
Ville = Représentant de l'église Kimbanguiste dans la ville de Kinshasa
Collège = Représentant de l'église Kimbanguiste du monde

"Frais Kimbuta" (*)

Dépenses pour ordre	40%
Frais généraux	60%

Detailed breakdown

☐ **Dépenses pour ordre**

Minerval	100	CDF
Appui aux écoles primaires pour TENAFEP	100	
Bulletin	250	
Assurance	200	
Commission urbaine	250	
Appui supervision activités scolaires	400	
Appui SERNIE provinciales	470	
Programme carnet de santé	3000	

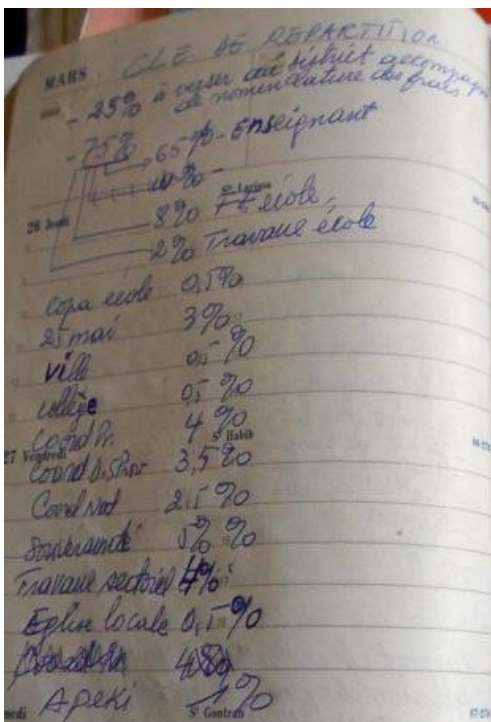
☐ **School**

Equipement divers	8%	
Entretiens et réparations	8%	
Fournitures de bureau	8%	
Interventions ponctuelles	40%	82%
Rencontres locales	8%	
Constitution de bibliothèques scolaires	10%	

☐ **Frais généraux**

Ecoles non-conventionnées	Ecoles conventionnées
S/PROVED	COSPRO
Inspool	CODI
PROVED	CONAT
IPP	Inspool
SE COPE	S/PROVED
ANAPE CO	PROVED
	IPP
	SE COPE
	Parent association

Interventions ponctuelles = teacher salary top-ups
Source:
No # circulaire N°MINEECG/CABMIN/1/1063/CM/2014 of September 26 2014
No # circulaire N°MINEECG/CABMIN/264/CMBBY/2015 of November 25 2015
(*) Kimbuta is the name of the Governor of Kinshasa.



Catholic network

Teacher salary top-ups	60%
Fonds Commun de Solidarité	20%
Fonctionnement école	15%
Bureaux gestionnaires (Catholic only)	5%

Source: Catholic schools in Kinshasa

Kambanguist Network

**EGLISE DU CHRIST AU CONGO
ASSOCIATION DES PARENTS D'ELEVES ET ETUDIANTS
DES ECOLES PROTESTANTES DE LA RDC
=APEP=**

1. support des frais de fonctionnement aux différents bureaux 1^{er} Trimestre 2014-2015

01. Coordination Nationale des ECP

1. FF	150 FC
2. Transport	100 FC
3. Synode Nationale	50 FC
Total	300 FC

02. Coordination Urbaine des ECP

1. FF	500 FC
2. ASG	100 FC
3. Transport	800 FC
4. Annuel	30 FC
5. FF	300 FC
6. Synode Urbaine	100 FC
Total	1830 FC

03. Coordination Communautaire

1. FF	1000 FC
2. ASG	100 FC
3. Transport	1500 FC
4. Annuel	20 FC
5. FF	200 FC
6. Synode Communautaire	200 FC
7. Construction BCC	500 FC
8. Bureau Représentatif Légal	300 FC
9. APEP	50 FC
10. Fiches Fiches diverses	300 FC
Total	4170 FC

04. APEP/CPK

1. Comité Scolaire	160 FC (à percevoir à l'école)
2. Comité National	50 FC
3. Comité Urbain	100 FC
4. Comité Communautaire	130 FC
5. Equipement	100 FC
6. Services Eglise	100 FC
Total	640 FC

05. Supplément F.F. Ecoles Scolaires

Ecole Primaire	900 FC	Total 2.900 FC
Scolaire	2000 FC	
Ecole Secondaire	1500 FC	
Scolaire	2600 FC	Total 3.600 FC

06. Différents bureaux de l'Etat

1. Division Urbaine	22 FC
2. IPP	20 FC
3. S/PROVED	30 FC
4. S/PROVED	30 FC
5. Inspool	30 FC
Total	132 FC

Total Primaire : 9.972 FC Total Secondaire : 10.672 FC

9.8.1. Les frais scolaires doivent être versés aux B.C.C. moyennant un reçu spécial qui transmettent par le compte bancaire MUTUELLE SCOLAIRE accompagné de bordereaux des Elèves en ordre de paiement.

2. les frais de fonctionnement alloués par l'Arrêté de l'Etat (Tribunaux, J) doivent être versés au Comité Scolaire

Coordination Communautaire des ECP/CPK
Ambassade KASONGOLO/SHANGHAI
Coordination C.E.P./CPK

Président
Cristian OLULO MUDIANGOMBA

Protestant network

Teacher salary top-ups	(70%)
Fonctionnement école	
Bureaux gestionnaires (*)	(30%)
Contraignants (*)	

Source: *Protestant schools in Kinshasa*

(*) See picture for detailed breakdown
(*) includes minerval, SONAS, SERNIE, etc. (see "frais Kimbuta")

Islamic network

"Frais Kimbuta"	(8%)
Motivation	(45%)
Bureaux gestionnaires	(6%)
□ BCR (Conseiller résident)	
□ BCU (Coordination urbaine)	
□ BCN (Coordination nationale)	
□ Division	
□ S/D	
□ IPP	
□ Inspool	
□ SECOPE	
□ APECI	
□ ADECOM (Développement communautaire)	
Fonctionnement école	(33%)

Source: *Islamic schools in Kinshasa*

All payments are cash payments⁵⁶. This raises the question of receipts that may or may not exist. Many of these are hand-written *décharges* or *reçus provisoires*. Debt collectors (*agent recouvreur, percepteur*) often sign in a log where the school records expenses. HTs from remote schools have to travel to urban centres where administrative offices are located, incurring more costs. In FBO networks, payments to government authorities (PROVED, S/PROVED, IPP, Inspool, etc.) may be centralised (e.g., Catholic network) reducing travel time for HTs⁵⁷.

HTs and teachers are under considerable pressure to collect and pay fees. The protestant network has more than 100 communities (e.g., CPK 46^e *Communauté Protestante au Katanga*). All of them charge fees and seek to adopt their proper fee practices. State-run schools (*écoles non-conventionnées*) operate under the authority of government structures (PROVED, S/PROVED, IPP, Inspool, SECOPE, SERNIE) whereas in faith-based schools (*écoles conventionnées*) 'due obedience' is an unquestioned principle. All networks use a domineering style of leadership. Because of their authority to recruit and sack HTs and teachers, they can exercise a firm grip. In FBO networks staff sign an Addendum (*Avenant*) when recruited and commit to respecting education and church authorities (*à respecter les autorités tant scolaires qu'ecclésiastiques*) (ECP/BCA). These Addenda primarily seek to enforce a code of 'moral'

⁵⁶ Cf. Interviews with HTs (in PO, Ma, Eq, KOR, KOCC, BC, SK and KAT).

⁵⁷ Examples are: S/PROVED/BDD. Répercutant les instructions de la hiérarchie nationale. ECP/Ma. Chaque gestionnaire communautaire est chargé de faire une large diffusion dans toutes les écoles de sa gestion et de nous faire rapport du résultat de son travail.

conduct. They also exert pressure and penalise non-compliance or resistance. On the ground, various enforcing strategies coexist. These mainly are:

- **Teams assigned to collect fees in schools.** The coming and going of education officials in schools is an often-heard complaint from HTs. Ad-hoc teams may tour schools to collect outstanding fees (KIN, PO). This includes the use of pre-printed payment forms (*fiche de versement des frais*) and pre-calculations that inform schools in advance of what they have to pay.
- **Written communications to HTs.** Written notices (*convocation/invitation de service*) to individual HTs are common practice. These invitations take the form of financial controls that have a strong-arming character. (**Box 21**)
- **Orders from the top to lower echelons.** Not all fees are decided at lower levels. Some are the result of a process that starts at the top. The *frais d'identification informatisée de l'élève* collected at the initiative of the MoE/SG is one example. The vertical hierarchical structure of networks serves as a chain of command, where every echelon exercises control and pressure on lower ones. In the Kimbanguist network an estimated half of all fees are collected under the direct authority of the Coordination nationale (CONAT) to finance church activities (such as the improvement of the New Jerusalem temple in Nkamba). The number of fees raised countrywide for pastoral reasons is impressive. (**Annex 5**). Other major financial operations such as Paquet minimum/MASCO⁵⁸ in secondary schools (central MoE) and the *Fonds Commun de Solidarité* (Catholic network in Kinshasa) are decided unilaterally in the absence of dialogue and prior consent from schools and parents.

Box 21: Written notices to HTs

- **Invitation de service (IPP, Kinshasa-Ouest)** (...) Mr le Préfet de (...) de vous présenter au bureau de l'IPP (...) muni des effectifs scolaires et preuves de paiement des Frais MASCO. Motif : solder les frais MASCO et faire le suivi de versements de différents frais.
N.B. La transparence dans la gestion des différents frais fait partie de la bonne gouvernance. Des bons comptes vous éviteraient des sanctions administratives et disciplinaires.
- **Convocation de service (CODI ECC) URGENT** (...) Directeur E.P. (...) Nous vous prions de bien vouloir vous présenter au Bureau de la Coordination diocésaine et urbaine des ECC de Kinshasa dès réception et muni de la présente convocation chez : le Chef de service des Finances. Motif : versement solde des FF 14-15.
- **Invitation de service (COSPRO Funa ECC)** (...) Monsieur (...) de l'école E.P. (...) se munir de : cahier de perception, cahier de répartition des frais ou cahier miroir, preuves de versement de FIP et FCS 2015-16, états de paie de septembre et octobre (...). Motif : 1er contrôle financier 2015-16.
- **Invitation de service (IPP, Kinshasa-Est)** (...) Mr le Préfet de (...) auprès de l'IPP muni de preuves de paiement FRAIS MASCO. Motif : paiement frais MASCO.
- **2ième invitation de service.** Mr le Préfet de (...) auprès de l'IPP muni de preuves de paiement FRAIS MASCO. Motif : paiement frais MASCO. N.B. Dernier avertissement avant la transmission des insolubles auprès du Directeur Provincial pour la sanction.
- **Lettre N°ADK/CCATH/CSPF/F4/.../2015-16.** A Mr le Directeur E.P (...). Objet : Rapport de gestion financière 2014-15. Sauf erreur de notre part, il ressort du contrôle financier (...) que vous êtes redevable d'un montant de (...) FCS/FIP/FF CSP. Nous vous invitons à régulariser votre situation financière dans un délai de 48 heures à dater de ce jour, étant donné qu'il s'agit des sommes déjà perçues et non versées. Faute de quoi, une action disciplinaire sera ouverte à votre charge. (...) Vu l'urgence qui s'impose selon les recommandations de la Coordination diocésaine et urbaine.

⁵⁸ MASCO stands for *manuels scolaires*.

- FCS = Fonds commun de solidarité ; FIP = frais d'intervention ponctuelle ; FF CSP = frais de fonctionnement Coordination sous-provinciale.

Source: Written notices collected in Kinshasa (2014-15).

Use of coercion. FBO letters to schools⁵⁹ provide abundant evidence of the use of intimidating language. (Box 22) These largely corroborate the view of HTs and COPA members.⁶⁰ (Box 23) Some 98% of interviewed HTs⁶¹ say they cannot refuse an order from above for fear of disciplinary action that can take multiple forms (including demands for written explanation, reprimand, suspension, transfer, dismissal, etc.). Interviews are filled with words that convey a climate of fear and intimidation. Some examples are: sanctions (noted 40 times), *révocation* (15 times), suspension (11 times), *blâme* (6 times), *insoumission* and *insubordination* (12 times) and *ordre* (17 times) (Boxes 22-24). At times, the tone of the writing is openly threatening: in Bas-Congo, schools that do not participate in a teacher training will be excluded from the EXETAT; in South-Kivu, schools that do not comply to instructions (*la ligne de conduite*) will not receive government-distributed textbooks (Box 24).

Box 22: Disciplinary action against HTs for outstanding school fees

ECK/Orientale

- **Rappel à l'ordre.** Aux Chef d'Etablissement (...) Nous avons le regret de constater que depuis le mois de septembre 2014 votre école n'a versé que USD146.5 sur USD1,085 prévu pour les festivités du 25 mai 2015. (...) La présente constitue une mise en garde très sévère à votre endroit, et vous demandons de vous acquitter rapidement, faute de quoi, vous subirez la rigueur de la loi pour l'insubordination, contreperformance et détournement.
- **Procès-verbal d'ouverture d'action disciplinaire.** A Mr le Préfet (...) avons constaté les fautes disciplinaires suivantes : 1. Refus d'exécuter les ordres et recommandations des autorités hiérarchiques en foulant ainsi au pied les résolutions prises de commun accord à la réunion de la rentrée scolaire sur les différentes charges financières de votre école pour n'avoir versé que USD248 sur USD1,085 (...). 2. Négligence et contreperformance dans l'application des différentes recommandations des autorités hiérarchiques et irresponsabilité pour n'avoir pas sanctionné ou proposé des sanctions exemplaires à l'endroit des enseignants non conforme à leurs engagements pour l'intérêt supérieur de notre institution caractérisé par le non dépôt de rapport mensuel de culte, retard ou non versement de la solidarité communautaire et sectorielle, apport en sac de ciment, USD10 de Papa, etc. (...).

PROVED/Bas-Congo

- **Les écoles n'ayant pas participé à l'Atelier de formation.** Mesure conservatoire. A Mr l'Inspecteur chef de pool (...). Je vous invite de prendre la mesure conservatoire de suspension assortie de l'action disciplinaire à charge des Chefs d'Etablissement qui n'ont pas participé à l'Atelier de formation organisé par la province éducationnelle (...) sabotage de formation (...) Ils sont donc impérativement demandés de verser les frais d'organisation qui se chiffrent à 10,000FC (...).

ECC/CODI/Kinshasa

- **Procès-verbal de clôture d'action disciplinaire.** Au Directeur de l'école (...) Vu le dossier disciplinaire ouvert le (...) à charge de (...) nous décidons d'infliger au prénommé la peine disciplinaire suivante : exclusion temporaire de 3 mois avec privation de salaire (...) pour le motif suivant : n'avoir pas apuré les frais scolaires réellement perçus pour l'exercice 2014-15, FIP : (montant) et FCS (montant).

Source: <Insert Notes or Source>

Box 22: Use of coercion

1. Threat of sanctions against 'offenders' (*contrevenants*)

Bandundu

- **CP/CADC.** Evitez des sanctions SVP.

⁵⁹ Analysis of some 550 letters collected in schools (all provinces).

⁶⁰ Cf. Interviews with HTs (120) and COPA members (40).

⁶¹ Reportedly, some HTs and COPA members refuse to pay fees that come without an official letter (e.g., La SERNIE a présenté un message phonique demandant 500FC par élève au niveau local pour une fiche et nous avons dit non. Les frais SERNIE n'ont pas été payés faute de document (PO/ECC). Si ces frais ne sont pas couverts par un document, je peux refuser (Ma/ECP/81e CMUC).

- **CP/35è CUEBC.** Partant de ces mesures devant souffrir d'aucune faille, je prends la liberté de vous instruire qu'à ces cultes à organiser avant le 15 novembre 2015, chaque élève de la maternelle au primaire des milieux ruraux verse à titre d'offrande spéciale 100FC, celui du secondaire 500 FC. (...). Je vous demande d'accorder à l'exécution de la présente le bénéfice de la diligence car les contrevenants seront sanctionnés (Signed Bishop, Vice-Président de l'ECC/Bandundu)

- **CP/ECSE/ESECO.** A ce propos, vouloir vous comporter en responsable pour ne pas embrasser de sanctions.

Bas-Congo

- **Pool secondaire/Matadi.** Teacher training (Sésam project). Ceux des CE ou des professeurs qui saboteront la session de formation verront leurs écoles mises en quarantaine et leurs enseignants exclus de toutes les activités liées à l'EXETAT
- **ECl.** Frais communautaires. Nous vous transmettons en annexe (...) pour exécution dans vos établissements respectifs et vous rassurons que vous devez tenir pour que l'opération réussisse au risque d'encourir des sanctions très rigoureuses aux contrevenants.
- **CP/CEAC.** Participation in a retreat. Aucune absence ne sera tolérée et les récalcitrants ne s'en prendront qu'à eux-mêmes.

Nord-Kivu

- **ECK.** Les récalcitrants s'exposeront à la rigueur de la loi. Stricte observance.

Sud-Kivu

- **ECl.** Ceux qui ne se souscriront pas dans cette ligne de conduite se verront sanctionnés et omis lors de la distribution des manuels scolaires par l'Etat.
- **Adventistes du 7è jour.** Ces frais sont fixés par élève et par trimestre. Ils sont attendus à notre Bureau au temps opportun. Celui qui ne transmettra pas il subira la rigueur de la loi. De bons comptes font de bons amis !

Maniema

- **ECC.** Construction of the CODI office. Néanmoins, pour les CE qui ont manifesté une négligence en 2014-15 à la sensibilisation des parents pour cette fin noble et progressiste conçue par la Coordination et ayant moins contribué sont désormais invités à se ressaisir cette année pour échapper aux sanctions administratives qui leur sont prévues.
- **Adventistes du 7è jour.** Contributions aux activités spirituelles. Retenez que, des mesures sévères seront prises à l'endroit des contrevenants. Un homme averti en vaut deux.

Source: <Insert Notes or Source>

Box 24: Unquestioned obedience

Bandundu

- **CP/35è CUEBC.** Training of chaplains (...) l'imputation est à charge de vos écoles.

Il y a ordre.

Nord-Kivu

- **ECK.** Il est à noter par ailleurs que la participation au culte chaque premier dimanche du mois est obligatoire pour toute personne oeuvrant au sein des ECK. Qu'on se le dise ! On y reviendra plus.

Sud-Kivu

- **ECK.** Nous espérons que, vous accorderez un intérêt supérieur à cette instruction pour maintenir l'harmonie et la collaboration avec notre Eglise. NB. Les instructions hiérarchiques demeurent impérativement la ligne de conduite.
- **ECl.** Contribution of 75USD per school to finance the visit of the Conseiller National des ECl. Vu le caractère impérieux de cette recommandation, aucune excuse ne sera tolérée.

Katanga

- **ECK/CONAT.** Cette disposition ne pourra souffrir d'aucune faille ni négociation quand à son application sur le terrain.
- **CP/30è CPCO.** Cette circulaire ne doit souffrir d'aucune faille.
- **CP/36è CCCA.** Considérant l'importance et l'urgence de l'oeuvre (Centre d'accueil de formation) aucune défaillance ne sera tolérée à ce propos.

Kasai-Occidental

- **CODI.** Workshop « Education et la famille ». La participation de chaque CE est obligatoire et aucune absence ne sera tolérée.
- **CODI.** Vœux évêque. Les résolutions suivantes ont été arrêtées en rapport avec votre contribution qui revêt un caractère obligatoire (...).

Bas-Congo

- **ECI/AG de la COMICO.** S'agissant de cette instruction qui doit être observée et appliquée avec stricte observance, nous vous demandons à tout un chacun de s'acquitter de cette obligation avant

The dominant power of education authorities facilitates the emergence of rent-seeking practices. (**Table 17**) All networks have developed side activities to increase their income⁶². Highly concentrated in urban centres, such practices have been reported everywhere. For schools, these are unforeseen expenses that continue eroding their operating budgets. A fine line may exist between networks (FBOs, MoE) and individuals (PROVED, S/PROVED, IPP, Inspool) because the final beneficiary remains unknown. Rent-seeking practices include:

- The selling at exorbitant prices of back-to-school/year-end reports, training modules, syllabi, books, school calendars and photographs of education authorities (including church dignitaries). At the scale of Kinshasa this is potentially lucrative business (e.g., in state-run schools, the book *Comment diriger une école?* (IPP Kinshasa) was sold at least 20 times; the *Recueil de directives* (MoE/SG) 26 times).
- Compulsory contributions to finance visits, happenings (e.g., anniversary of a CODI, festivities of the Cardinal, a newly appointed PROVED, etc.). 'Work' visits to schools (*séance de travail*) always generate additional costs.
- Compulsory participation in fee-based training activities

3.6 Use of fees

The absence of public accountability on income and use of school fees at higher levels contrasts with greater transparency in schools. National, provincial and FBO-levels are opaque on the use of school fees. They do not make public their financial reports and do not provide feedback to schools and parents. The lack of budgets and planning process means that activities cannot be formally connected to the type and level of fees and makes external monitoring impossible. During this survey, access to financial records was denied. Income and use of major financial operations that flow upward (such as the *minerval* (FPEN), 9% of (T) ENAFEP (MoE)⁶³, MASCO (MoE) and FCS (Archdiocese of Kinshasa) remain largely unknown despite evidence of substantial cash flows⁶⁴. (**Box 25**)

Generally, schools are more transparent. The use of household contributions for teacher salary top-ups is well documented. This is also the highest fee that remains at school level. Findings show generalised practice and availability of signed local teacher pay sheets. Some show details on how salaries are calculated. Most of the schools keep records of income and expenditure, even if many of these are in rudimentary formats and not all HTs possess the required discipline for order and organisation. The importance of GAs of Parents and the need to provide feedback

⁶² Cf. Interviews with HTs and findings based on expense records, particularly in Kinshasa (all networks).

⁶³ Appui à la hiérarchie: Cabinet of MoE (3%), SG (3%) and IGE (3%).

⁶⁴ This includes evidence of bank transfers and receipts collected in schools.

on the use of school fees remains a major area for improvement. Schools that have transparent school fee policies are in a better position to request accountability from others.

Box 25. Examples of non-transparent major financial operations

Rationale. Following fees are of interest because of their magnitude and their efficient and coordinated collection methods.

Minerval

Estimations on income from the *minerval* show annual cash flows of about USD1million (2015-16) for primary and secondary students (university students pay USD5 and are not included). Since 2009, the FPEN (*Fonds de Promotion de l'Éducation Nationale*) has started collecting the *minerval* fee (*). According to the FPEN, 50% stays at provincial level (Governor) and 50% are paid to the Direction générale of the FPEN in Kinshasa. The FPEN has rehabilitated some schools (roof repair in Kinshasa, KOR and BC) and purchased buses. Financial reports are not made public and remain at central MoE (Table 14).

Paquet minimum/frais MASCO (manuels scolaires)

In 2012, the MoE/IGE decided to provide all secondary schools with a uniform set of 162 textbooks at a cost of USD1,999 to be collected from parents (°). *Ce montant est supporté indistinctement par tout élève du secondaire, il est réparti au prorata des effectifs de l'école bénéficiaire.* At provincial level, IPPs centralized the payments, including their transfer to the commercial bank BIC under the heading MASCO sprl (commercial company). The overpriced cost per book was about USD12 whereas on the cover stood USD6. Because of the high cost, schools started paying in tranches and payments could take several years. Schools could not refuse the books and had to charge additional fees from households. In school year 2012-13, this represented close to USD40million of revenue for a total of 19,595 registered public secondary schools (MEPSP, *Annuaire statistiques*). Three years later (2014-15), some schools were still clearing their debt. Since the start of the operation, essential questions such as procurement, relevance, financial reporting, etc. have not been made public.

Fonds commun de solidarité.

The Archdiocese of Kinshasa established the Fonds commun de solidarité (FCS) in September 2008. The Fund seeks to combat an unjust school fee system that keeps children out of school. *L'Église Catholique ne peut favoriser, dans les écoles qui lui sont confiées, un système qui introduirait une discrimination dans le droit de chaque enfant à l'éducation scolaire* (Letter ARKIN/LMP/461/08 of September 19 2008). Designed as a centralised equalisation fund (caisse de péréquation) that collects and redistributes school fees, the concept was abandoned when teachers started complaining about the irregular payments of their salary top-ups and rebaptised the Fund fosse commune (mass grave). Since school year 2009-10, the Fund collects 20% of total school fees in all Catholic primary and secondary schools in Kinshasa. (*) The Fund has two private bank accounts in USD and euros (Compte Procure des Missions) where schools make cash payments. For school year 2014-15, documented evidence from primary (50) and secondary schools (30) shows total payments of about USD600,000 and 70,000 euros. On November 11 2015, the Fund had reportedly spent USD4,365,834 (°); this included school improvement (Institut Bakanza: electricity system; Institut Boyokani: roof repair of the boarding school; EP3 Lingwala: latrine rehabilitation), construction of offices and classrooms, an outboard for the CODI, scholarships etc. HTs and teachers are generally unaware of what the FCS is doing. (**) Estimates show the FCS may have collected the equivalent of USD40million since 2009-10. (°°) The FCS financial reports are not made public and are for internal use only.

(*) Field visits show some schools are exempted.

(*) The FPEN was created in 2006 (Presidential decree N° 06/015 of March 23 2006).

(°) Operation Projet Paquet minimum des manuels scolaires 2è phase (Ministerial letter N°MINEPSP/IGE/8000/1278/2012 of September 5 2012).

Source: <Insert Notes or Source>

Table 18: Estimated revenue of the Fonds commun de solidarité (2009-16)

Number of students								
Primary schools								
	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	
Schools	306	312	320	346	390	398	406	
Students	137,965	137,103	142,709	168,779	164,979	168,279	171,644	
Secondary schools								
	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	
Schools	155	171	174	170	180	184	187	
Students	99,539	100,135	98,168	101,491	110,385	112,593	114,845	
Source: MEPSP, <i>Annuaire statistiques</i> Yellow cells are projections. Computed by author.								
Estimated annual revenue FCS (USD)								
Primary schools								
	2014-15		2015-16		2014-15		2015-16	
Students	168,279		171,644		Average		school fee	
FCS	2,641,974		2,835,561		78.5		82.6	
Secondary schools								
	2014-15		2015-16		2014-15		2015-16	
Students	112,593		114,845		Average		school fee	
FCS	4,132,152		4,365,241		183.5		190.1	
Total	6,774,126		7,200,803					
FCS = Fonds commun de solidarité								

4 Conclusions and ways forward

Without adequate revenue replacement, the burdensome school fee system will persist⁶⁵. Despite a flagship fee abolition policy (*gratuité*), strategic institutional and financial reform has not taken place. This situation is likely to continue because:

The legal and administrative framework is unclear and weak. Current legal provisions are inadequate for regulating school fee policies and practices. There is an absence of sound institutional and fiscal arrangements throughout the system that would ensure responsible use of resources, relevant planning and budgeting, review of roles and responsibilities, transparent bookkeeping and reporting.

Uncontrolled expansion of the system. There is an absence of controls on the expansion of the system: new schools, teachers and administrative offices continue to mushroom without adequate planning and budgeting or the necessary discipline of public financial constraints. The result is unsustainable development. Uncontrolled growth of the teaching force and the number of schools and management offices inevitably leads to more fiscal pressure. In a context of limited public resources, the financial burden will continue to be shifted to households.

Unpaid and low teacher salaries. Figures show between 60-90 percent of household contributions are used to finance teacher salaries (NPs) and/or salary top-ups. If public provision were to replace this level of private provision considerable financial resources would be required from government.

Insufficient provision for operating costs for schools and offices. Schools and offices need a minimum of resources to operate. The report of the Task Force Gratuité (2012) estimated realistic minimal amounts based on field analysis⁶⁶. In a context of fee abolition, the World Bank agreed to finance operating grants, first to primary schools (PURUS/PARSE), later to sub-provincial administrative offices (PROSEB). In both cases, Government made the commitment to replace and/or complement the grants, but did so only partially⁶⁷. Both schools and administrative offices continue to rely on household contributions for their basic operating costs.

A reduction in school fees is likely to simply reduce the amount of funds that remain in schools. Given the paucity of public funding, the predatory nature of the education superstructure and the current imbalance in power relations, restrictions on school fee income might have the unintended consequence of reducing the funding available for front-line services.

The system might not cope with any increase in enrolments resulting from a sudden reduction in school fees. The resilience of education delivery has been weakened by years of chronic underfunding, the uncontrolled proliferation of inefficient administrative structures and staff and the upward flow of funds to support them. The focus has been on job creation and the maintenance of self-serving bureaucratic structures. Investment in schools and teachers and school quality has suffered as a result.

⁶⁵ See practical lessons learned from school fee abolition initiatives (World bank/UNICEF (2009). Abolishing school fees in Africa: Lessons from Ethiopia, Ghana, Kenya, Malawi and Mozambique, pp. 23-31).

⁶⁶ Task Force Gratuité: Synthèse des travaux - Rapport final (2012).

⁶⁷ IDA-financed PURUS/PARSE annually allocated USD 400 to a primary school. The MoE topped-up with USD 600 paid in monthly installments of USD 50. However, when PARSE ended the MoE did not replace the USD 400 despite initial commitment. Similarly, GPE-funded PROSEB (with WB as TTL) allocated operating grants to subprovincial administrative offices on condition the MoE would finance their provincial counterparts. This occurred only once; in the end, only 6 of the 36 months were effectively paid.

4.1 What can be done?

The school fee system will not disappear overnight. In a context of chronic underfunding, uncontrolled growth and the complexity of the DRC education system, dependence on school fees is a necessity. However, stabilising the system to ensure it does not get any worse would be the starting-point for a reform agenda.

4.1.1 Increasing transparency

Establishing transparent and harmonized school fee practices across the system would be a first, but critical, shift towards public accountability. An initial step towards institutional accountability would be greater appreciation that private contributions raised for public service delivery are per definition public resources that stewardship of public resources is important⁶⁸. Better public financial management and greater accountability are therefore preconditions of reducing reliance on school fees.

4.1.2 Building political will

The upward flow of fees from schools to upper levels in the system is a major contributor to the problem. The beneficiaries are, however, numerous and the institutions they represent powerful. It is not helpful to regard upward flows as morally wrong and those who benefit as intentionally bad. They include in their number many, for whom monies derived from school fees is their only source of livelihood. They are locked into a system that they cannot change. The number and range of individuals and institutions that have an interest in maintaining the status quo is such that gaining consensus behind reform will be a mammoth task. It is unrealistic to expect the current beneficiaries willingly to surrender their source of funding without some guarantee that an alternative is available.

Creating a greater understanding of the current situation might, however, help to build political will and support the process of change. Despite the fact that most of the Congolese population, particularly those with children, will be very conscious of the burden of school fees, there is considerable secrecy about the system. There appears little public understanding of how the system works or its effects in terms of inequity and compromised school quality. Greater transparency would encourage more people to challenge the assumptions on which the system rests. While this report may help to expose the nature and magnitude of the problem, the popularisation of further research into the consequences of a high cost, low value-for-money education system would help to build a basis of evidence to support change.

4.1.3 Increasing value for money

Gaining greater value for money entails getting better services from those charged with delivering services. This would include:

- **Redefining roles and responsibilities.** Clear roles and relevant tasks are a requirement for cost-effectiveness and appropriate financing.
- **Greater efficiency in resource allocation.** Stable, predictable, and timely financial flows are a precondition for system building.

⁶⁸ The integration of school budgets into national budgets underpins this logic. (See: Loi-Cadre 86/005, Article 99. Le budget des établissements publics est intégré dans le budget général de l'Etat ; Loi-Cadre 14/004, Article 169. Le budget des établissements publics de l'enseignement national est intégré d'abord dans le budget des entités territoriales décentralisées, ensuite dans celui de la province et dans le budget général de l'Etat).

4.1.4 Establishing the legal basis for school fees

Current ambiguities and loopholes in the legal framework are barriers to reform and change. A critical and independent analysis of the clarity and consistency of existing legal texts would bring into focus the legitimacy of school fee policies and practices. The *Loi-Cadre* 2014 confers formal powers onto Governors to authorise school fee decrees, but does not give FBOs similar authority. It could be useful to explore the feasibility of drafting Governor decrees that agglomerate all fees. At the start of the school year, the Governor would then sign a single decree that makes parallel or additional school fee directives from FBOs or any other education authority illegal and unacceptable. Only fees listed in Governor decrees could be collected. This would cut down to two the number of authoritative texts on school fees and improve overall transparency (Governor decrees and GA minutes in schools).

However, in the past, attempts at standardisation have failed. Making lists of prohibited fees has proved inefficient (2007)⁶⁹. Even the weight of inter-ministerial decrees has been ineffective (2007)⁷⁰. Past evidence shows the limited capacity of central MoE to enforce compliance. Any effective shift towards simplification should therefore be reinforced at provincial level and gain full local support. This is also in conformity with the Law (*Loi-Cadre* 2014, Art. 177).

4.1.5 Establishing norms

To introduce some discipline to regulate currently uncontrolled school fee practices, norms need to be established to cover the setting of fees, the collection of fees and the uses of fees. The three guiding principles on which these norms would be based are:

- Reduction in the number of bodies with authority to levy school fees - only Governor decrees at provincial level and GA minutes in schools should have authority on school fees.
- Expenditure of school fee revenue should be governed by good public financial management.
- The processes should be transparent and accountable.

The application of these principles for norm setting is expected to trigger local debate over the relevance and justification for fees. It would require the establishment of routine planning and budgeting activities that are preconditions for calculating relevant costs and therefore for determining revenue needs. Moreover, it could also be expected to build awareness around more responsible use of household contributions. In practical terms, establishing norms will have implications for action at different levels.

Actions required at a national level will include:

- An Inter-ministerial decree (co-signed by the Central Ministries of Education and Interior) transmitting the new school fee policy to schools and offices.

⁶⁹ Cf. Ministerial decree N°MINPSP/CABMIN/001/2007 of June 21 2007 on Frais de scolarité pour l'exercice 2007-8 that establishes a list of authorized fees (Nomenclature des frais de scolarité: minerval, prime d'assurance scolaire, frais des épreuves de fin des cycles, frais d'internat and frais d'administration) and prohibited fees (1. frais d'inscription, de réinscription ou de confirmation d'inscription; 2. frais d'admission en classe supérieure; 3. frais d'évaluations internes; 4. frais de motivation des enseignants; 5. frais de transport des enseignants; 6. frais de contrôle des dossiers des finalistes; 7. frais d'encadrement des finalistes à l'Examen d'Etat; 8. frais d'organisation matérielle de l'Examen d'Etat non officiels; 9. frais de suivi de la passation des épreuves de fin de cycles). All of these fees continue being collected although some of them are corruption practices rather than fees.

⁷⁰ The inter-ministerial decree N°MINPSP/CABMIN/306/2007 of October 9 2007 (signed by Minister of Interior, Decentralisation and Security, Minister of EPSP, Minister of Finance and Minister of Budget) on Fixation des frais scolaires à percevoir au sein des écoles primaires publiques was an effectiveness condition for the IDA-financed PARSE project. The decree introduces a new list of authorized fees for public primary schools (minerval, la prime d'assurance, les frais des pièces scolaires - bulletin, fiche d'identification, carte d'élève -, les frais d'administration et les frais des épreuves de fin de cycle primaire TENAFEP) and determines their ceiling amounts. For instance, the TENAFEP fee could not exceed CDF1000 but this was never implemented.

- Intensive communication to inform schools on local school fee policies, school fee levels, norms that regulate the school fee process and list unauthorized practices.

Actions at the provincial level will include:

- Revising the role and modus operandi of MoE Committees (Commissions provinciales de l'EPSP) that have decision power on provincial school fee policies (composition, representativeness, internal rules, decision making process, etc.).
- Developing and disseminating simple guidance on Planning, Budgeting & Reporting to ensure all offices have understanding of basic bookkeeping and record keeping and of how to prioritize resource allocation within limited budgets.
- Making public MoE Committee meeting minutes and sending free copies of Governor decrees to all offices and schools.

Actions required in schools will include:

- Revising the role of the GA of Parents vis-à-vis COPA/COGES to ensure the GA has authority on school fee policy and exercises control over the COGES.
- Developing and disseminating guidance on School Improvement Planning and basic financial management and record keeping that emphasise the importance of stewardship of public and private contributions.
- Making the recording and dissemination of GA and COGES meetings mandatory.

4.1.6 Involving civil society

Households are largely ignorant about the complexity of the school fee system and schools are unaware of how money is spent at upper levels. There is a need for routine scrutiny to provide feedback on how school fees are decided, collected, and used.

The GA of Parents has the potential to provide an autonomous role in regulating school fees at the local level. Well-informed GAs would be better equipped to discuss reasonable school fee levels and combat irregularities. Although the evidence from other studies⁷¹ suggests that CSOs are weak and largely compromised by benefiting from the status quo, there should be a role for them in providing external monitoring the school fee system. This could be done through a variety of means, such as the establishment of SMS platforms for monitoring unauthorised school fee practices in schools and the creation of grievance redress mechanisms to combat coercion and rent-seeking practices.

In the longer-term, there is a need to build CSO capacity and expertise on school fees and PFM to monitor the use of resources in the education system. This would need to be part of a broader process that seeks to develop local capacity to screen and question Government policies and actions, and ultimately improve the accountability chain between service providers and service users.

4.1.7 The role of the Development Partners

Ninety-five per cent of the executed budget of MEPS is spent on the payment of salaries⁷². School fees contribute a high proportion of total expenditure on education (both salaries and non-salary spending). However, another significant contributor to the non-salary budget is the

⁷¹ Political Economy Analysis of Civil Society Organisations, ACCELERE! 2 (March 2017)

⁷² Review of the 2016 education budget, ACCELERE! 2 May 2017

combined contributions of the Development Partners. This financial stake gives the potential for leverage on the issues surrounding school fees.

To make the most of this leverage, the donors need to be armed with knowledge of the system and its effects and to speak with a coordinated voice on the subject. It is hoped that this report will have added to the sum of knowledge about the range and complexity of private funding of the public school system and its associated administrative structures. More research will be needed on the effects that dependence on school fees has on school attendance and issues of equity, social exclusion, and gender inequality. In addition, further work will be needed on the vagaries and irregularity of school funding and its consequences for the quality of education. This knowledge should form the basis of a coordinated donor approach to school funding and inform policy discussions with the government of DRC on ways of moving away from the current over-reliance on school fees.

