



Federal Republic of Somalia

Ministry of Education, Culture and Higher Education

Private School Policy

Creating regulatory and policy frameworks for private schools in Somalia

AUGUST, 2020

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Abbreviations

BC- British Columbia

CEC- Community Education Committee

EMIS – Education Management Information System

NOI- Notice of Intention

ESSP- Education Sector Strategic Plan

FMS- Federal Member States

MoECHE- Ministry of Education, Culture and Higher Education

NDP- National Development Plan

PSP- Private School Policy

SNU- Somali National University

TPT- Teachers Proficiency Test

FOREWORD

As articulated in article 30 of the Somali provisional Constitution “Education is a fundamental Right and an essential tool to ensure that all Somali citizens realize their full potential”. The practical implementation of this fundamental right is under the portfolio of the Ministry of Education, Culture & Higher Education of the Federal Government of Somalia, whose mandate is to provide quality education and training to create competent workforce for the local and international job market and promote economic growth, Innovation, national cohesion and peace.

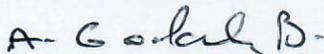
The vision of the Ministry is to establish a quality modern education system for Somali citizen that offers equal opportunities and promotes respect for human rights and observes Islamic Principles.

Following the unfortunate collapse of state institutions including schools and tertiary institutions, some parents and professional educators came together to reopen some education centers in order to fill the void left by the central government that fell in 1991.

These initial efforts expanded and morphed into education umbrellas before the end of the 20th century. Since then, the umbrella organizations have been providing education without government support or regulation.

In fact, these private institutions that formed umbrella coalitions did a lot of efforts in providing education services, however, the absence of regulatory framework and policy procedures to regulate the sector resulted the private education institutions to stray as they were not following guiding policies, procedures and standards. With these keeping in mind, this policy for private schools has been enacted and disseminated upon my signature.

The intent of this policy is to establish and implement a system to guide private education institutions; The main objectives of this policy are: (1) to enhance a private education system, which results a conducive environment to boost quality and equitable education to all Somali citizens (2) to improve the quality and relevance of the private education to contribute to the socioeconomic of the country (3) to establish basic minimum standards to maintain the quality and credibility in the private education (4) to improve the functions of the private education with effective management and administration.



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Section One: Setting the context

1.1 Introduction

Education is a fundamental Human Right and an essential tool to ensure that all Somali citizens realize their full potential. The development of human resources is one of the principle factors in achieving economic and social development. With the right education and skills, a country can find new routes to growth which is built on human capital. In other words, quality education and skills provide the best way out of poverty, inequality, and instability. Quality education, therefore, shapes the future of nations and societies positively and Somalia is no exception. In a nutshell governments all over the world invest heavily on education for the realization of Human Capital among others. Further, an effective education system requires adequate regulatory and policy frameworks that ensure accessibility, integrity and quality.

This School Policy (PSP) defines Somalia's private education system and outlines the policy measures that guides the development of effectively regulated and robust private education sectors in Somalia. Through this policy, the ultimate objective is to expand access, improve quality and provide parents with alternatives to public schools. Hence, the Government of Somalia recognizes that education is the backbone for socio-economic development. By supporting and regulating the private education sector, the government aims to build an educated and highly skilled population, through which Somalia will achieve an excellent education system, accelerated economic growth and overall national development goals.

The PSP consists of two chapters. The first chapter sets the context of the policy; it contains five sections. The first section provides a brief introduction to the policy, which could be used also as an executive summary. The second section locates the policy within the organizational landscape; it presents the ministry's mandate, vision and mission statement. The third section encapsulates the evolution of the education system in Somalia. It divides the history of education in Somalia into five stages. The fourth section

captures the broader policy direction, which lists this policy's vision, mission, and policy outcome; and it links the policy to the national regulatory and policy frameworks. The fifth section succinctly depicts discussions about the definition and classification of private education in the Somali context. The second chapter consists of twelve sections, which puts forward twelve private school policies. These policies cover various issues that pertain to access, quality as well as governance and private education management. The document concludes with a list of references and appendices/annexes.

1.2 Ministry of Education, Culture and Higher Education (MoECHE)

1.2.1 Mandate

The Mandate of MoECHE is to provide quality education and training to create competent workforce for the local and international job market and promote economic growth, Innovation, national cohesion and peace

1.2.2 Vision

To establish a quality modern education system for Somalia citizen that offers equal opportunities and promotes respect for human rights and observes Islamic Principles

1.2.3 Mission

MoECHE's mission is to facilitate, guide, deliver and coordinate universal quality education to promote national integration, social justice and development in Somalia.

1.3 Background

Education in Somalia has gone through different stages during the 19th and 20th centuries, which encompasses pre-colonial, colonial and the post-colonial era. Education was often informal and focused in Islamic Studies and Arabic language during the precolonial stage. Several cities and towns emerged as centers of Islamic culture and learning in that era.

The learning centres include Baardheere, Herar, Marka, Mogadishu and Zeila. Mosques and Islamic school were built to teach Muslims about the Qu'ran and the Arabic language in these cities (Africa Muslims Agency, 1997). Furthermore, Muslim scholars also spread among the nomads, teaching the Arabic reading and writing through Qur'anic and other Islamic subjects.

It is safe to say that modern formal education came to Somalia with the colonial powers, who established very few schools in the country. According to Ali (2020), "as of 1947, there were a total of 32 elementary schools in both British and Italian Somaliland" (p.17). In addition, the colonial rulers established few low-level education institutions that suited their political and economic needs. These institutions include a police academy, a nursing school and a management school that graduated local Somalis who could be intermediary administrators between the "masters" and the colonized people. To put it differently, graduates of these institutions were mostly trained to promote colonial culture, enforce colonial policies and maintain law and order on behalf of the British or the Italians rulers. After the independence in 1960, and, during the military government in particular, the education sector in Somalia experienced a rapid expansion. The Somali language was written, a nationwide literacy campaign was developed and successfully implemented; and the government constructed and opened hundreds of schools. Further, private and public schools coexisted during the civilian government, which was from the independence in 1960 until the military coup in 1969.

Somalia's military government nationalized all private education institutions immediately. It also banned the establishment of private schools in the country. The ban continued for nearly two decades. However, the military government permitted the establishment of (albeit very limited) private schools in the late 1980s; and when the government collapsed in 1991, less than a handful of private schools started ,or were just starting, to operate. Most likely, this did not occur due to a change in the political ideology. Rather, the limited change appears to be a necessity as the government became unable to finance the basic education sector in the country due to economic pressures and devaluations of the Somali Currency.

Following the unfortunate collapse of state institutions including schools and tertiary institutions some parents and professional educators came together to reopen some education centres in order to fill the void left by the central government that fell in 1991. These centers were opened in response to the demand for education, particularly by those affluent families who lived in urban settings such as Mogadishu, Hargeysa and Garowe. These initial efforts expanded and morphed into education umbrellas before the end of the 20th century. Since then, the umbrella organizations have been providing education without government support or regulation. The umbrella organizations did not bring to the fore schools that offered quality education standards as an alternative to existing public schools. Rather they merely continued educating children in a setting where no government or other significant entities were able to provide this service.

Globally, private schools contribute to the larger public good; they often fill a gap in public provision of schooling (Gotkin, 1993). Some of these institutions are not like the traditional elite schools. Rather, they are affordable and cater to low income family. These kind of schools are in Kenya, India, and Nigeria to name but a few, where public schools do exist but parents choose to send their children to low cost private schools as they provide better education to their children as opposed to public ones due to the commitment and accountability to perform in children's learning outcomes (Tooley, 2013). Unlike the education system in Somalia where public provision is limited, low cost private schools are well managed and are accountable to the customer (the parent).

In addition to private education providers, two regional governments also contributed to the nation's education significantly. The government of Somaliland pioneered in this regard, where it started reopening schools by the early 90s. Similarly, the Puntland State of Somalia has been providing education services since late 90s. Both of the two regional states enjoyed relative peace and security compared to the south and central regions of Somalia.

The return of the Somali state with functioning government institutions, including ministry of education, hailed a critical point for the nation's education system. The government acknowledged previous efforts of umbrella organizations and took steps to show support and encouragement for the establishment of good and competitive private schools to

expand access and improve quality of education. This policy is anchored on the government's priorities of access, quality and good governance. The policy also promotes sustainable development through a set of goals and outcomes translated to a policy framework. It is an attempt to provide a framework and guidance for the private education system with an ultimate agenda of fostering increased access, quality and good governance.

1.4 Broad Policy Directions

1.4.1 Policy Vision

An effectively regulated private school system that fosters both access and quality within a national education framework.

1.4.2. Overall Goal

To develop a policy for private education provision, which includes minimum standards, school licensing, curriculum implementation, and quality assurance.

1.4.3. Policy Outcome

A quality and relevant private education system that is well governed to effectively serve the public good.

1.4.4. Policy objectives

The objectives of the policy are;

1. To foster a private education system that creates an enabling environment for the expansion of equitable access to education for all Somalis;
2. To improve quality and relevance of private education to meet the socio-economic needs of the nation;
3. To develop and implement basic standards that protect the quality and integrity of the private education system; and
4. To improve the operations of the private education system through good governance and effective management.

1.4.5. Defining the Problem

Somalia has experienced some major changes in education over the past nine years. Many of these changes were triggered by shift in the nation; notably, the government's move from transition to a federal republic with functioning institutions including education sector. However, the newly established ministry has been operating without an overall education policy framework and subsector administrative procedures. The absence of a comprehensive education policy to guide all stakeholders in the provision of education services has adversely affected learning outcomes at all levels. Different entities in the private education sector continued to deliver education without guiding policies, procedures and standards. The chaotic situation led to poor quality outcomes both at the system and the school level. It is against this brief background that the Private Education Policy has been developed.

1.4.6. Linkage with other Relevant Policies

The Private Education Policy is linked to other relevant legal and policy frameworks. It is designed to respond to the constitution (chapter 30, section 4) of the Federal Republic of Somalia, which stipulates that all private schools, institutes and universities must follow the guidelines of the national curricula and program of studies. Similarly, the policy is aligned to chapters 41 and 42 of the National Education Act. It is also linked to the general provisions of the National Education Policy. Furthermore, this policy directly contributes to the National Development Plan (NDP, 2020-2024), which states that:

Setting the legal and oversight framework is a priority, linked to strengthening the Education Management Information System, and institutional strengthening of the Ministry of Education..... Standards will be set and enforced for private sector providers, ensuring professional and hygiene standards are met (p.34)

Finally, this policy fulfils one of the ESSP's (2018) strategic objectives, which urges the government to develop, disseminate and implement all policies across all sub sectors including regulations on private schools. Furthermore, the policy follows the stipulations of the Re-Organization and Modernization of Ministry of Education Culture and Higher Education (2018).

1.5 Private schools: definitions and classifications

In a relatively recent study commissioned by the World Bank (2018), interviewed Somali headmasters offered more than 10 defining characteristics for public schools. Conversely, the opposite of these definitions could be derived for equally 10 definitions for private schools. This policy uses the findings of this study as a framework for discussions. However, responses from the roundtable and focus groups contribute significantly to the formulation of the document. Accordingly, private schools definitions and classification stem from these discussions.

Definitions suggested in the roundtable discussion are mostly similar with minor variations. They revolve around two key concepts, private ownership and private management. One participant defines private schools as “those schools that both the ownership and management are in the hands of private entities”. Another definition states that “a private school is an educational institution that is independent financially and in terms of management”. A third participant defines it as “privately owned and privately managed school that makes a profit”. In this definition, profit-making is a defining component in addition to ownership and management. As a result, non-for-profit, free schools, belong to the public system. However, other participants disagree with this definition and argue that accessibility and lack of fees do not make an institution a public. The owners of the institution may decide to limit accessibility and or charge fees. They may even decide to sell or give away the school without public input or accountability.

Finally, the following definition appears to be different from all proposed definitions; it contends that “a private school is a school that charges fees, inheritable and not open for everybody”. Private ownership and management are not mentioned in this definition, but one may infer private ownership and or management from the term “inheritable” as it is hard to imagine private individuals inheriting public assets. Accordingly, lack of accessibility, school fees and inclusion of heirs in the succession of ownership define private schools. However, this definition was also questioned by other participants, who speculated that the public would have no say if the owners of the school decide to sell, give it away or close it without a justifiable cause. No one can stop or question the members of the board as these actions are within the boundaries of their power and

authorities. Hence, the absence of inheritance, accessibility and being free of charge are not enough for an institution to be recognized as public.

With much lively discussions and clarifying positions, participants adopted the following definition, which contains two key components: ownership and management/decision-making. Private schools, therefore, was defined as **“educational institutions, which were privately founded and where some significant proportion of decision-making and management responsibilities remain in private hands”**. This definition appears to be containing all agreed upon components.

Ownership of the land and the school facility were not considered in this definition as private schools may use publicly owned land and facility. Similarly, government financing and regulations do not transform private schools to public as the government may provide substantial resources and control. Yet, these institutions will remain private. Despite the aforementioned attempts in defining what private school is, a legitimate question could be raised: what constitutes ownership and management of a school? There are no official documents available for the public, which may help in the definition of the term school ownership. However, during the 2019 school registration campaign, the federal ministry of education developed and used conditions as proof of school ownership. These conditions state, among other things, that private operators must show that (1) the school’s name is registered by a legally operating/licensed organization (a business company or charitable organization), and that (2) the registration of ownership is certified by officially licensed notary public.

In terms of articulating what entails “management or decision-making process” This policy leans on the World Bank’s (2018) document about Non-State Education Providers in Somalia provides useful and practical criteria for this matter. The document states:

Any actor that takes on the following responsibilities is defined as participating in management:

- (1) Teaching and administrative staffing decisions
- (2) Decisions that dictate the day-to-day operations of the school
- (3) Decisions related to the school curriculum at the primary school level
- (4) Determining the amount of school fees charged (p.29)

1.5 School typology/classification

There is no regulatory or policy framework to rely on. Subsequently, finding unanimously agreed upon distinction between private and public schools in Somalia appears to be elusive, to say the least. As the study from the World Bank (2018) notes, “Schools in Somalia are **managed** and **funded** in **complex ways** that often involve more than one stakeholders, and multiple bodies can claim ownership over a school” (p.27). This reality makes the classification of schools somewhat challenging. After an extensive discussion, the report proposes the following typology (p. 29): (1) Government schools; (2) Mixed school; (3) Umbrella schools and (4) Independent schools.

After careful examination of the proposed typology, this study suggests classifying schools into two categories:

1. Public school: publicly owned and operated. The public is often represented by the ministry of education or an elected board of education.
2. Private schools: founded and operated by private entities. A private school is owned by a legally registered and licensed authority that could be a charitable organization or a business company. Private schools could be further classified into two sub-categories: (a) Not-for-profit private schools. This group includes any school that is operated by a not-for-profit entity such as charities and communities. Operators of these kinds of schools do not intend to profit financially. Similarly, there are no shareholders with an expectation of salary, dividend or possibility of passing on a share to an inheritor. In other words, the school belongs to the charity and all extracted revenues are to be reinvested into the school. (b) For-profit private schools. These are schools founded with the intent to make money. They could be local or international. These kinds of schools are often founded and managed by a company or organization with shareholders.

It is important to note that umbrella organizations and mixed schools are not categories that are equal or parallel to public and private ones. Education umbrellas are voluntary associations that accept schools based on membership. They host schools or school authorities i.e. school owners. However, schools may leave the umbrella, join another one

or stay independent while still keep the status of “private”. The umbrella is, therefore, like a club, not a category in this context.

A combination of the two or a public private partnership (PPP) entails a mix of public and private ownership and or management. In this option, a ministry, a board or other education (public) authority may sign a partnership agreement with a private education entity. This appears to be a reasonable option. However, it is not a category of its own. Rather, it is an arrangement that could be derived from the two main categories. Hence, public authorities may develop a generic but flexible master agreement and consider this arrangement after ensuring that reasonable, fair and transparent terms and conditions are developed and disseminated.

Section Two: Policies

This section presents a number of policies that aims to guide the private school subsector. The policies stem from the information gathered from roundtable discussions and the focus groups. Further, these policies revolve around three broad priorities. Equity and inclusive education address access, while curriculum, examination and teacher education policies primarily deal with quality. The rest of the policies address both issues but focus on governance and education management. These policies are derived from the following list of policy areas suggested by the participating stakeholders:

1. Definition of private school.
2. Government- role and responsibilities towards private schools.
3. Registration and licensing policy.
4. Quality assurance
5. Examination policy.
6. Students' transfer policy
7. Teacher and head teacher quality and working conditions
8. Equity and inclusive education policy
9. CECs roles.
10. External supervision and inspection
11. Quality learning (number of years- no skipping grades).

2.1 Inclusive and equitable Access to Education

2.1.1 Problem statement

Number of school-attending girls is increasing and the ministry started to accommodate students with Special Educational Needs and disability (SEN/D) in the Form Four (Grade 12) examinations. However, the education system still suffers from various kinds of inequalities. Education Sector Analysis, (2017 and the Statistic Yearbook (2019) findings show that girls still face challenges both in accessing education as well as the extent to which female educators play leadership roles within the education sector. In general, schools do not have the capacity to accommodate diverse needs of the students such as vulnerable and marginalized students.

2.1.2 Policy statement

All private school authorities must demonstrate evidence of equitable access, inclusive practice and effective accommodation procedures.

2.1.3 Policy rationale or policy purpose

Implementation of equitable policy in education protects the rights of the student from vulnerable and marginalized backgrounds. The policy also contributes to the establishment of a diverse, fair and vibrant society.

2.1.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Support private schools to increase the number of girls and SEN/D students accessing, participating in and completing school.
2. Promote equitable access to quality, relevant inclusive education both in primary and secondary schools.
3. Encourage equitable distribution of schoolteachers across geographic areas
4. Increase proportion of female teachers and education administrators and help private schools to recruit female educators.
5. Ensure that the needs of vulnerable and marginalized students are accommodated
6. Ensure that private schools implement the guidelines of the National Special Needs Education Policy.

2.2 Private Schools' Policy

2.2.1 Problem statement

Operating schools without defined boundaries, regulations and guidelines often leads to conflict, confusion and poor quality education. Unregulated systems are also prone to negligence, corruption and lack of accountability.

2.1.2 Policy statement

All private schools are subject to general regulations as well as private school related policies, which include but are not limited to definitions, classifications, licensing and quality assurance mechanisms.

2.1.3 Rationale or purpose of policy

Private schools are to be defined, classified and effectively regulated. The Ministry shall license, accredit and oversee the day-to-day operation of private schools given that private school operators set their own policies and procedures. Though these policies and modus of operandi are in accordance with the government's policies and regulations, monitoring and inspections should be foundational to enforce the envisioned private school policy. These measures will contribute to the enhancement of quality education management in the country.

2.1.4 Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Confirm that all private schools receive and implement relevant government policies and regulations
2. Set and define private schools as “educational institutions which were privately founded and where some significant proportion of decision-making and management responsibilities remain in private hands”
3. Classify private schools into schools that are owned and operated by companies (businesses) or owned and operated by non-profit organizations independently, abiding to the registration and licensing system.
4. Ensure that private school teachers and principals fulfil all government requirements, including qualifications, certifications and licensing.
5. Ensure that private schools communicate student achievement using government approved platforms (i.e. EMIS)
6. Conduct inspections to ensure that private schools are operating in accordance with the policy regulations.
7. Contingent to budget availabilities, provide assistance, financial or otherwise, to accredited community and private, non-for-profit schools.

2.3 Registration and licensing policy

2.3.1 Problem statement

Data from the school registration campaign (2019) reveal the extent to which lack of proper registration and licensing impacts the education system. The result showed substandard school facilities, poor quality learning materials and unqualified teaching workforce. Schools are being opened without basic standards because there aren't any regulatory framework and or enforcing criteria-based licensing systems.

2.3.2. Policy statement

All Educational and Training institutions must be registered by the government in accordance with Section 42 of the Education Act as well as the policy measures of this document. After proper registration, school shall operate only when the ministry grants them a permit/license.

2.3.3. Policy rationale or policy purpose

Implementing criteria-based registration and licensing systems will provide the regulator with tools to establish, inspect and support schools. These tools will enhance the overall education quality. These measures will also protect the health and wellbeing of students and school personnel.

2.3.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Ensure school authority completes all required application forms
2. Confirm that all required documents are submitted, properly filed and approved
3. Ensure that the submitted (and confirmed) documents include but not limit to:
 - (a) School's name and location,
 - (b) List of owners,
 - (c) Contact information,

- (d) The names of the operators of the school, if different from the persons or organization referred to in clause-b,
 - (e) The qualifications of the proposed members of the instructional staff,
 - (f) The proposed programs of study, if different from the national curriculum,
 - (g) A list of subjects proposed to be offered and an outline of the major skills and knowledge areas to be learned by students, which must be consistent with the requirements of the ministerial guidelines,
 - (h) Proof that the building to be used by the school complies with municipal zoning bylaws, safety and the ministry's basic standards.
4. Confirm that the proposed school meets all basic standards before the school year starts
 5. Ensure that the school authority pays registration and or licensing fees
 6. Ensure that a temporary permit is granted before the proposed school is open
 7. Ensure that the new school obtains an interim-2 year's license- within three months of the school operations.
 8. Conduct an external evaluation by the end of the 2nd year to grant a five-year license.
 9. Ensure that school authorities do not change the approved location of the school, nor do they make any major alteration to the building without the ministry consent/approval.

2.4 External Evaluation and Inspection for Private Schools Policy

2.4.1 Problem Statement

Constant supervision and periodic evaluation are effective quality assurance measures. Without these measures, basic standards could be ignored; the quality of learning could be compromised and the safety of the students and school personnel could be subject for violation.

2.4.2. Policy statement

Private schools are subject to external evaluation and inspections for the purposes of issuing or renewing licensing certificates.

2.4.3 Rationale or purpose of policy

The external evaluation and inspection of private schools is to ensure that all schools meet and maintain the standards and requirements for their license/certificate under the National Education Policy, National Education Act, Private Education Policy and other relevant administrative procedures.

2.4.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Develop a comprehensive external evaluation exercise that examines the school's programs, facility, curriculum, student's record, operations and teacher certification to ensure that the school meets all basic statutory requirements
2. Conduct an external evaluation to issue a temporary permit before a new school starts to operate.
3. Conduct external evaluation at the 2nd year of the school to issue an interim licensing certificate. The next evaluation will be conducted in the 5th year for each school.
4. Conduct external evaluation at the school's cost if the minister of education deems the action necessary and if the school authority requests an evaluation.
5. Assign a team of quality assurance experts, led by a senior official, to conduct the external evaluation.
6. Assign a senior Quality Assurance official to conduct the monitoring inspections.
7. Prepare and share a checklist containing items that will be examined during the external evaluation as well as the monitoring inspections.

2.5 Student information management system policy

2.5.1 Problem statement

Ineffective management of students' information negatively affects the integrity of the education system; students' education history, achievements and learning needs may become subject to alteration or even disappear; individuals without the necessary basic skills may join the system without getting proper support. Furthermore, some students may skip grades, and thus negatively affect both the quality and integrity of the education system.

2.5.2 Policy statement

All new students regardless of their age, grade and region are subject to a proper registration. Additionally, students' learning progress must be recorded and kept in a secure government authorized platform.

2.5.3. Policy rationale and purpose

Secure and effectively managed student data will protect the system from various challenges, while lack of effective student information management makes the system vulnerable; it often compromises the quality and integrity of the education system.

2.5.4 Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Through EMIS, develop an effective national student registration system and implement it across the nation.
2. Through EMIS develop a secure online student information platform and grant restricted access to authorities, schools, students and parents.
3. Through EMIS, create a national student identification system and assign a computer generated number to every new student.
4. Ensure that transferring (senders) schools forward all necessary documents including, a copy of the birth certificate, Permanent Student Record (PSR), the most recent report card and other necessary documents as needed.

5. Ensure that the receiving school completes all registration requirements and updates the online student files or in a secure hard copy filing system if they have no access to internet.

2.6. Reporting Requirements and Data Collection Policy

2.6.1 Problem Statement

Without accurate data, the government will not be able to effectively manage, support or supervise the education system. Students' learning progress and overall well-being of school communities will be subject to misinterpretation leading to poor planning and ineffective decision making.

2.6.2 Policy statement

Private school authorities are required to provide information to the Ministry of Education for supervision, policy development and support purposes. Further, private school authorities have the responsibility to create their own student records policy.

2.6.3 Rationale or purpose of policy

A lot of vital data are in the care and control of the private Schools. The government needs these data and must be supplied to the Ministry of Education for a variety of purposes including the creation and maintenance of student records.

2.6.4 Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Ensure that detailed, accurate and timely data of the school operator (charity or company) are submitted to the ministry twice an academic year.
2. Ensure that all private schools that plan to operate in a given school year must submit a **Notice of Intention** (NOI) by August 1 of that year.
3. Ensure that school authorities inform parents and or students prior to a closure or relocation of the school 90 days at minimum.

5. Ensure that detailed, accurate and timely school personnel data are submitted to the ministry once a year
6. Ensure that evidence of the school facility's conformity to the basic standards is submitted to the ministry.
7. Ensure that each school authority develops an internal data collection and management of its own, which is compatible to the government platform.
8. Ensure that the government provides support and training for private school operators in learning how to use the government platform.

2.7 Basic standards Policy

2.7.1 Problem statement

In the absence of minimum standards, education will suffer from low quality and lack of accountability. School communities will face various challenges in terms of curriculum, teaching quality as well as the safety and appropriateness of school facilities.

2.7.2 Policy statement

All private schools must meet all basic standards before they start operating and during their operations.

2.7.3 Policy rationale and purpose

Meeting basic standards ensures the safety and wellbeing of students and school personnel. It also helps education institutions maintain good quality teaching and learning programs.

2.7.4 Policy Measures

In order to address this policy, the Government shall employ the following strategies:

Teachers

1. Develop a teacher qualification and licensing system and implement it across the nation
2. Develop a professional code of conduct and ensure that all teachers sign before they start teaching

3. Ensure that teachers are being effectively supervised, receive continuous training and regularly evaluated
4. Demand that all teachers consent to a complete criminal background check and obtain criminal record clearance before employment.
5. Allow professional teachers to be members of a trade union to protect their employment rights

Curriculum

6. Ensure that schools intending to grant national or state certificates implement the national curriculum and schools that do not intend to grant government certificates implement programs approved by the government only.
7. Develop a template for termly curriculum planning and enforce implementation on School authorities.

Land & Facility

8. Ensure that schools are built only on a zoned land
9. Mandate that, at minimum:
 - a. Regular schools without boarding are constructed on 100 mx100m.
 - b. Regular schools with boarding are constructed on 100 mx150m
 - c. Professional/technical schools without boarding are constructed on 100mx150m
 - d. Professional/technical schools with boarding are constructed on 200mx200m
10. Ensure that school facilities are fenced from the neighborhood for safety of learners and staff
11. Ensure that minimum distance between the school fence and the adjacent building is 30m
12. Ensure that primary school buildings have:
 - a. Minimum of *8 classrooms and one (1) office
 - b. Four (4) washrooms for each 8 classrooms
 - c. Minimum classroom size of 8mx6m
13. Ensure that High school buildings have:
 - a. Minimum of *4 classrooms and one (1) administrative office
 - b. Minimum of 3 washrooms for each 4 classrooms
 - c. Science laboratories (Biology, Chemistry, Physics and ICT).
 - d. Secondary and primary students, in the same school, are separated both during learning and recess times.

14. Ensure that sufficient, clean and safe water is available in the school
15. Ensure that a field, that is sufficient for the physical activities of the student population, is available
16. Ensure that the maximum number of primary and intermediate class size is 30 students
17. Ensure that maximum number of high school class size is 35 students
18. Schools that face challenges in meeting standards 16 and 17 may submit an application and seek permission from relevant education authorities.
19. Ensure a minimum of 2 emergency exits for every 160 students.
20. Ensure that all classrooms have a reasonable access to an emergency exit
21. Ensure that the school is fenced and away (at least 300 meters) from dangerous waters, open wells/pits, factories, roads, hospitals and similar sites.
22. Ensure that evidence of inclusion and accommodation of students with Special Educational Needs and disability is demonstrated.
23. Ensure that principal (administrator) student ratio is 2:500

** This standard will be relaxed/eased when dealing with small, rural or similar kinds of school facility.*

2.8 Community Education Committees Policy

2.8.1 Problem statement

Without formal representation, parents are either disengaged or often become a cause of disruption, leading to interference in school affairs. Accordingly, schools become overly centralized, which marginalizes local communities and weakens transparency and accountability in schools.

2.8.2. Policy statement

Every private school shall establish an effective Community Education Committee (CEC). The government will support CEC entities; train them and provide school improvement grants through the committees based on school improvement plans.

2.8.3. Policy rationale or Policy purpose

Establishing effective Community Education Committees will foster community ownership of the school and will strengthen community-based management approaches for education (CEC Policy Framework, 2019). The committees will not only raise funds and find resources but they will also participate in the decision-making process. This will help improve accountability and efficiencies within the education sector

2.8.4. Policy measures

In order to address this policy, the Government shall employ the following strategies:

1. Ensure that each school establishes a functioning and representative Community Education Committee (CEC)
2. Disseminate and implement the approved CEC policy framework (2019)
3. Provide training, mentorship and support for CEC members
4. Help communities gain and increased knowledge, skills and awareness of their situation and solutions
5. Ensure that CEC members are informed about the school progress (teaching and learning) and included in the decision-making process.
6. Ensure that school grants are dispensed through the CEC or in collaboration with the committee.
7. Create a CEC reporting and accountability system, including meeting templates, decision-making processes and financial records.

2.9 Curriculum Policy

2.9.1 Problem statement

An outcome-based curriculum framework with detailed syllabi and textbooks has been established for primary and secondary levels. This is an important milestone for the education system in Somalia. However, the quality of the new curriculum is yet to be evaluated. Also, there are potential challenges to the implementation of the curriculum nationwide. In addition, there is still a dearth of learning materials in schools. Finally, there are no rules governing the schools that choose not to follow the national curriculum.

2.9.2. Policy statement

Private schools, intending to participate in the government's examinations and certification system, must meet certain requirements for instructional time, subject offering, learning outcomes and other matters. These items are specified in the National Curriculum Framework and its approved syllabi. All schools must teach mandatory subjects specified in this document.

2.9.3. Rationale or purpose of policy

To ensure quality and coherent learning outcomes, private schools offer education programs that meet the requirements of the National Curriculum Framework and its relevant administrative procedures. If they opt out of the national curriculum, they must still teach all mandatory subjects and they can only use government approved programs for the rest of the subjects.

2.9.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Ensure that all private school curricula meet the guidelines in the national education act, policy and relevant administrative procedures.
2. Develop curriculum implementation guidelines and procedures
3. Establish and empower an effective and accurately staffed Quality Assurance Department to monitor, evaluate and spearhead the delivery of the curriculum.
4. Ensure that the education system maintains standards that are specified for each learning area at each level across all educational institutions.
5. Strengthen the capacity of curriculum development personnel and quality assurance processes for the development and distribution of learning materials.
6. Overcome the supply-side barriers to learning materials in schools by bolstering sub sector initiatives to develop learning materials.
7. Develop procedures for cyclical curriculum review and evaluation.
8. Develop an approval system (procedures, criteria etc.) for textbooks and learning materials.

9. Develop an approval system of the instructional plans and learning outcomes of the private schools that OPT OUT of the National Curriculum.
10. Ensure that all schools intending to grant government certificates use the national curriculum and its syllabus at minimum.
11. Instruct schools that offer curricula other than the national curriculum to submit a detailed program of studies to the ministry for approval.
12. Ensure that all private schools teach Islamic Studies in Arabic only and Social Studies in Somali only- in all grades- using the national curriculum.

2.10 Examination Policy

2.10.1 Problem Statement

Lack of proper assessment often leads to inadequate learning outcomes as programs and strategies are largely built on a poor diagnosis. Furthermore, it is hard to hold people and institutions accountable without conducting valid and reliable assessment. Students' promotion from one grade to another, as well as, issuing graduation certificates are also linked to the outcomes of these assessments. At the system level, the government obtained hard numbers and realized the depth of the crises in the education system from the national examination result.

2.10.2. Policy statement

In addition to school level formative assessments, all Grade Eight, Grade Twelve (Form 4) and ABE level 4 students shall go through formal (government) examination in order to continue to the next level of education.

2.10.3. Policy rationale or purpose

Appropriate assessment of learning outcomes through formal examination could be used as a tool of accountability measure to help improve teaching and learning. On the larger scale, the results of exams will inform national policy, priorities and planning strategies.

2.10.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Enforce rules and regulations that protect the validity and integrity of the exams

2. Ensure that all government exams are valid, reliable and relevant. In doing so, private school authorities may trust and implement relevant procedures.
3. Develop and disseminate detailed examination administrative procedures to private school authorities.
4. Ensure that private schools intending to participate in the national examination contact and register with the ministry on time.
5. Ensure private school authorities register and submit exam candidates on time to the ministry
6. Create standardized mechanism confirming the eligibility of all candidates before they sit for the examination.
7. Ensure the ministry shares the examination results with relevant private school authorities.

2.11 Teacher Education and Management Policy

2.11.1 Problem statement

Both the Education Sector Analysis (ESA, 2017) and the Teacher Proficiency Test (TPT, 2019), reveal that the education system in Somalia has been suffering from a chronic shortage of qualified teachers. Poor teaching quality and low proportions of qualified teachers consistently feature as a critical challenge for children’s learning across all educational subsectors in Somalia. Currently, there aren’t coordination or coherent mechanisms across various regions and institutions that address on-going teacher development, management and licensing. Number of female teachers is low and there are only a handful of female education administrators in the entire nation. There is also a lack of qualified special needs education teachers.

2.11.2. Policy Statement

Private schools must employ only qualified and licensed professional teachers who are able to accommodate the diverse needs of all students in their schools.

2.11.3 Rationale or purpose of policy

To ensure both quality and equity, all private schools implement the National Teacher Education Policy and its administrative procedures. They are also expected to follow the guidelines of this private school policy.

2.11.4. Policy Measures

In order to address this policy, the Government shall employ the following strategies:

1. Develop an in-service teacher training and mentoring strategy and methodology linked to school supervision exercises.
2. Establish a technical partnership with Somali National University's (SNU) Faculty of Education and other reputable universities in the country to support the creation of comprehensive in-service training materials for the various education subsectors.
3. Ensure private schools implement the National Teacher Education Policy and its administrative procedures.
4. Ensure that Teacher training institutions meet minimum infrastructure and academic standards
5. Establish teacher education system that is relevant and responsive to the needs of the country
6. Establish and operationalize several teacher training institutes catering to the nation's need for qualified and competent teaching workforce.
7. Support and guide private schools in the implementation of teachers' professional development and mentorship strategy.
8. Develop teacher management system that caters to both public and private school teachers
9. Develop, implement and enforce a rigorous national teacher certification and licensing system.
10. Recruit and encourage female educators for teaching and administrative positions, while ensuring a safe environment for them to thrive.
11. Train teachers to accommodate the diverse needs of the student population

12. Mandate a minimum number of operational days (3 days) for teachers' professional development sessions during the academic year.

2.12 Application of the policy

2.12.1. Scope

This Sub sector Policy applies to all private school authorities, operators, learners, teachers, employees, and other providers of private education in all private, formal and non-formal learning institutions.

2.12.2. Limitation

The application of this subsector policy is limited to the Grades 1-12 private school system for both formal and non-formal sectors in the Federal Government of Somalia.

2.12.3. Review

The minister shall assign experts to review this policy every six years, starting from the date of the approval.

SECTION THREE: APPENDICES

3.1 References

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3.2 Detailed Work plan

Date (s)	Activity	Output	Required resources
Feb. 10	Plan in detail for all tasks	Inception report and work plan	Consultant time
Feb. 15	Desk review	Review of key policy documents and propose options.	Policy documents; education act/policy
Feb. 24	Internal- expert consultation	Feedback/inputs into roadmap	Venue, refreshment, stationery
Feb. 29	Ministry leadership consultation	Policy directions	NA
March 9	Benadir Region: Stakeholders' consultation	Banadir region Consultation report	Venue, refreshment, stationery & accommodation
March 12	Puntland: stakeholders' consultation (opted out)	Puntland state Consultation report	Travel, DSA, Venue, refreshment, stationery & accommodation
March 26	Jubaland stakeholders' consultation	Jubaland state Consultation report	Travel, DSA, Venue, refreshment, stationery & accommodation
March 12	Galmudug: stakeholders' consultation	Galmudug state Consultation report	Travel, DSA, Venue, refreshment, stationery & accommodation
March 21	South West: stakeholders' consultation	Southwest state Consultation report	Travel, DSA, Venue, refreshment, stationery & accommodation
March 15	Hirshabeelle: stakeholders' consultation	Hirshabelle state Consultation report	Travel, DSA, Venue, refreshment, stationery & accommodation

April 18	Draft Policy (Inputs from FMS incorporated)	Initial draft policy document	NA
April 19	Share the draft policy with key stakeholders	Feedback/comments/inputs	Draft policy document
April 25	Validation meeting (Mogadishu)		Travel, DSA, Venue, refreshment, stationery & accommodation
April 28	Submission the final draft	Endorsed Private School Policy	NA

3.3 Survey Questions

Survey for Federal Member States (FMS)

Conduct a survey of Federal Member States' relevant administrative procedures and practices regarding the private education management

1. We have a written private school policy and or procedures: -----Yes. No.
2. We have a standard private school building code: -----Yes. No.
3. We have a written private school registration process: -----Yes. No.
4. We have a functioning private school department: -----Yes. No.
5. We have private school inspection process and template -----Yes. No.
6. We inspect private schools: (a). Regularly. (b). As needed. (c).
Never

A. Roundtable questions

1. What is your definition of a "private school"?
2. How do you classify schools in Somalia- typology?
3. What are the policy/regulatory challenges private education operators' face?
4. What policy topics do you suggest/recommend being included in the proposed document?

B. Focus groups' questions

1. Parents
 1. Are you part of the decision-making body in school system? If yes, how?
 2. Do you think the school fees you pay are reasonable? Why? Why not?
 3. Do you get your money's worth? How?
 4. Do the schools share your child's progress? How?
 5. Should the government mandate fixed school fees? Why? Why not?
2. Umbrellas
 1. Do you have a policy and or organizational handbook? Can you describe?
 2. Do your schools have a common fee structure? If yes, can you share?

3. Do the parents in your school(s) get their money's worth? How?
4. Do your schools share students' progress with parents? How?
5. Are the parents in your school(s) part of the decision-making process? How?
6. Should the government regulate private school fees? If yes, how?

3. Independent schools

1. Do you have a policy and or organizational handbook? Can you describe?
2. Do you have a fee structure? If yes, can you share?
3. Are the parents in your school(s) part of the decision-making process? How?
4. How can you describe your relationship with the ministry?
5. How do you share students' progress with parents?
6. Should the government regulate private school fees? If yes, how?

4. Education partners

1. Do you have written education management procedures? Can you describe it?
2. How can you describe your relationship with the government/MoCHE?
3. Should the government regulate private school fees? If yes, how?
4. Should the government finance private schools, community schools or both?
Explain why.

5. Group X- government agencies

1. What is your view of the ministry's role in private education management?
2. Should the government finance private schools?
3. Should the government give school buildings to private schools? Why? Why not?
4. Should the government rent school buildings to private schools? Why? Why not?