

MEMORANDUM

**TO: MINISTER, YUNUS CARRIM
DEPUTY MINISTER, STELLA NDABENI-ABRAHAMS**

**FROM: CHAIRPERSON, DR L MALOKA
ACTING CHIEF EXECUTIVE OFFICER, DR HAROLD WESSO**

DATE: 26 MARCH 2014

SUBJECT: NATIONAL ICT POLICY (GREEN PAPER)

Dear Minister and Deputy Minister,

As you may know, the Ikamva National e-Skills Institute (iNeSI) and the provincial e-skills CoLab directors participated in the provincial workshops on the National ICT Policy. We have also taken the liberty as a state-owned company responsible for developing e-astuteness and e-skills capacity development to study the document and would like to bring the following to your attention.

An overall comment, the document treats ICT as an infrastructure project with separate components, lacks a coherent theme and fails to adequately recognise that modern ICT devices and applications are disruptive technologies that will fundamentally change the nature of all services, processes, industries, the nature of work, employment, entrepreneurship, social interactions, economies of scale, governance and develop new concepts of 'community' that will bypass the very nature of identity (cultural, geographic, social). Hence, treating the matter as an infrastructure project with some disparate applications entirely fails to address the core issue and that is shaping demand in the national interest i.e. the socio-economic appropriation for local benefit. Further it fails to recognise rate of technological change and the resultant impact on every aspect of South African life. Of necessity this means that the policy will always be out of date and that the resultant responses will be reactionary and increasingly reflect a position where South Africa will compare unfavourably with African countries that have and will take a more forward looking position.

In addition:

1. The National Integrated ICT Policy Green Paper (henceforth: GP) sets itself the very ambitious goal of covering not only what can be narrowly described as the ICT sector, but the larger terrain of telecommunications, broadcasting and postal services. The reason provided for covering such a large terrain, is the convergence of technologies, implying that the shift from analogue to digital creates a new dimension of functioning for all of these sectors. This consideration is





indeed valid and important, but the way it is handled in the GP gives the impression that it is about delivering a green paper on the mandate of the DoC, rather than on ICT policy as such. It is a reality that the boundaries between previously separated sectors are fading with the fact that all of these sectors are driven by, or at least influenced by, the use of ICT. (For example: The ICT sectors depends upon broadband; ICT devices are increasingly mobile, thereby also making mobile broadband a priority; content is provided not only by way of “push” on radio and television, but by both “push” and “pull” on ICT devices; and the list can go on). However, all of these aspects cannot be incorporated under an ICT policy. As you know, business and investors are looking for an “ICT policy” that does not try to achieve everything in one blow, but that addresses – and provides guidance and leadership on – a range of issues that are critical to their activities in the whole range of areas that make up society and human endeavour.

2. *Defining the scope of “ICT policy”*: With ICT being pervasive in all aspects of life and work, it becomes questionable whether it is at all possible to develop an ICT policy that tries to incorporate more than the basics of the area of ICT itself. An alternative approach should rather try to achieve:
 - a) depth of thinking about the nature of the changes brought about by ICT;
 - b) understanding the core issues that are of a determinative nature in both the medium term and longer term future, that is, doing a foresight study;
 - c) how government objectives relate to the current and coming changes, or how ICT in all its dimensions can be harnessed to achieve the objectives;
 - d) the nature of the shift that should be brought about through policy interventions and regulation; and
 - e) guidelines for moving forward at levels of developing strategies, tactics and modes of implementation.

Of course, ICT is today increasingly linked to a range of other technologies that are enablers, or other dimensions that cannot be ignored. In a well thought through policy, these links can be identified, but they need not all be pursued in detail.

Some countries follow the approach of taking a broad view – but also a bold and innovative view – of their “digital future” and then moving forward to support all actions to make this bold view a reality in policies of various national and provincial government departments as well as in various strategy documents, some relating to a dimension of this digital future, and some to a sector in which the policy for that sector is defined in such a way that ICT forms a fundamental an essential part of it. In this way, it is unnecessary to define an “ICT policy” that encompasses every area in which ICT plays a determining role – simply because it is impossible to define “ICT policy”. (Examples of this are Germany, the UK and New Zealand. The EU, in fact, also takes such a bold future view with its “digital Europe” approach.)

3. *The structure of the document*: The GP is not a well-structured document and does not form an integrated whole, despite the use of the word “integrated” in the title of the document. The various chapters (or at least many of them) were compiled separately and the products were then just put together, leading to a confused and mixed-up (“deurmekaar”) overall product. For example: the issue of “content” is raised numerous times in the various chapters, instead of giving a thorough analysis of the new “content” scene somewhere in the document.

By trying to be inclusive on “ICT policy”, the document is more of a compendium of the applicable policies, regulatory bodies, the issues to be addressed, the problems and obstacles experienced, etc. In many cases, there is no in-depth analysis of the issues, or attempts to



indicate how other countries have gone about to move towards a solution. In most cases, there is very little guidance or leadership.

4. *The “digital divide(s)”*: The GP does not show a good understanding of the nature of the “digital divide(s)”. By way of a remark on the significance of convergence (par. 1.2), it is stated that we should not “inadvertently create a digital divide”, and relating this directly to “access”. The “digital divides” already exist, and they involve many more levels than access. The literature on the nature of the information society as it is currently developing, makes it quite clear that there are other forms of “divides” that are much more relevant than “access”. These relate to adoption, usage, the capability of users at all levels of society to get access to information relevant to their life and work, etc.
5. In fact, the aspect of “access” figures prominently in many chapters of the GP. Core to these other dimensions, are e-skills and the training, support and mentoring programmes required. In the list of key principles informing policy-making in the DoC, the right of access to training and support on an ongoing basis to be able to take part in the benefits of the information society and knowledge economy (par. 2.2) should be considered as well. Many of the other rights can only be effected if this condition is provided.
6. *e-Enablement of government services*: References to “e-government” are prominent in the GP. However, many references relate to policy, infrastructure, regulations and structures. The importance of the skills of the people currently in service is not addressed – and this remains key to the implementation of these services. An extensive programme of skills development (upgrading of skills, re-skilling, etc.) is required to ensure that the persons currently in the government departments and who do not have the required skills, can move through further levels of skills development.
7. *Skills development*: Chapter 11 does provide important perspectives on skills development. However, skills development is a core aspect of each sector and component addressed in the GP and should get attention as applicable and relevant in each of the other chapters.
8. *e-Skills taxonomy*: The lack of a clear and encompassing e-skills taxonomy becomes clear at various points in the document. It is only when such a taxonomy is available, understood and used, that the situation regarding e-skills can be properly addressed.

In light of the above comments and given the mandate of iNeSi, it is our understanding that the policy must support our activities for 2014 and beyond. Should there be a need to discuss any of the above comments, please do not hesitate to contact us.

Yours sincerely,

Dr Maloka
Chairperson: iNeSI

Dr Harold Wesso
Acting Chief Executive Officer: iNeSI