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Research Article

IMPROVING GOVERNMENT COMMUNICATION SERVICES THROUGH EFFECTIVE MONITORING AND EVALUATION

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Abstract

Government Communication has been regarded key management tool in South Africa. This was seen following the dawn of democracy in 1994 when it became imperative for government to communicate in transparent and developmental manner. Government has been communicating and using resources to communicate to its people with the aim of empowering them with information they will use in developing their lives. Resources are allocated for communication in all spheres of government. The impact assessment adopting techniques of qualitative methodology has been used to assess impact of government communication in South Africa. It was realised that government communication is implemented in different ways by different government institutions, resources are used year after the other but there is no indication that the messages communicated has impact in the lives of the target audience. This can be attributed to lack of effective monitoring and evaluation in government communication.

Keywords: Communication, Monitoring, Evaluation, effective communication.

INTRODUCTION

South African government spends millions in resources every year in communication services. A lot of planning effort is used across all spheres of Government. The national sphere of government creates policies including the National Communication framework which is shared to the provinces, districts and local municipalities. Provincial departments, districts and local municipalities have annual budgets spent on matters of communication with the aim of making sure community members are empowered through communication services. Empowerment comes in target audience receive the message, respond to the message by using it and use the message to change their lives for the better. As indicated in many studies conducted on rural development, community development demands for community participation on matters of their development (Chambers, 2010). This is possible only if there is effective communication. The indicator to functionality of implemented communication will be based on developmental achievements communities derive after each communication event. This is possible if activities of communication are effectively monitored and evaluated. The indicators put for achievement should also be measurable and pitched to seek for long term impact. Dominantly communication services is measured by implementation of services such as Media Relations, Events Coordination, Management of Social media communication, management of government publication and Inter-governmental Relationships. Success of many communication events is measured by the number of people who attend the events, number of media houses giving coverage and number of people accessing the social media. These are all output indicators with less to do with the impact of the messages carried on these communication platforms. Good media coverage and attendance to the event alone is not enough to infuse message impact hence a need to introduce monitoring and evaluation in government communication.

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LITERATURE REVIEW

Defining communication

There are many definitions of communication. Some define it by what they want to achieve. People talk of Developmental Communication-Communication meant to leave development behind after the completion of the process. On the other hand Rasila and Mudau (2014) write of Effective Communication as the one getting communities to be active participants in the process. Although focussing of Effective Communication for Rural Development these authors argue that effective communication refers to communication characterised by community participation where community members are empowered with information and are part of identification of their needs, challenges, intervention, implementation thereof, monitoring and evaluation in an environment conducive for them to take issues of their own development into their own hands by becoming active participants and owners of the whole process. Rasila and Mudau (2014) went on to develop a Communication Model for rural Development which is relevant to all successful communication.

Explanation on the Model

In communication processes, there are three main role players. These are the sender of the message, the channel or medium and the recipient of the message. What makes this Model different from other communication models is the manner in which the message is created, dispatched and the degree of participation of both the sender and the recipient in the process. In other models of communication such as the one of Aristotle, Shannon-Weaver and Barlo's, it is clear evident that the participation role of the recipient was not equally recognized as that of the sender of the message. In this Model, just like in other outlined models, sender (e.g. Government/ Municipality) still creates the message (1); however, the first step of the sender is to share the message with the recipient (e.g. target sector of the community) who then is regarded as an equal participant in the whole process (2).

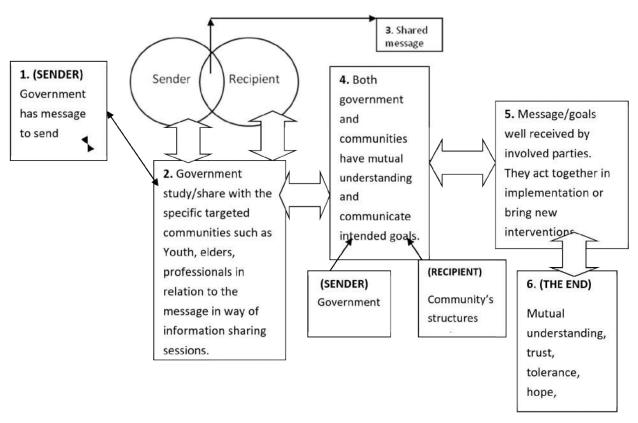


Diagram 1. Rasila's Communication model

Mutual understanding on the intention of the message is then Derived from the mutual created by all partners (3). understanding reached, the two role players take equal participation in implementing all that is necessary for the achievement of the intended goals of the message (4). At this stage, the message is shared and well received by all. This, for example, is a stage where the intention of government as the sender is well received and implemented by government agencies and the target audience within the community and well understood by the whole community. It is argued that the results or end product belongs to all as community members were empowered and are also accountable as they were involved in, for example, understanding and identifying challenges, intervention, implementation and the end results (5). Finally, both parties come to a stage in the process where they have to evaluate the process they jointly monitored from the beginning. There is at this stage trust, tolerance hope and joint accountability. If the results of the whole process are positive, they jointly celebrate and if undesirable, they will together agree on the way forward even if it means jointly going back to the drawing board and start afresh. Both government and community members do not have room for pointing fingers and blaming each other for sabotage, deliberate failing, neglect as they all are important stakeholders (6). This Model encourages community participation in matters of governance hence proper for rural development, the core of government communication.

Communication and rural development

The importance of Rural Development in rurally dominated Limpopo Province of South Africa by empowering community members through communication cannot be undermined. This is not important only for South Africa. Schramm (1997) argues that the problem of underdeveloped regions across the globe is partly due to poor or lack of effective communication.

In support, Dudley (1997) points out that there is relationship between communication and economic growth which accompanies development. According to the South African State of Local Government Report (2009), a considerable communication gap exists between local spheres of government (municipalities) and communities in rural areas. Chapter 4 (Section 4.5) of the White Paper on Transforming the Public Service of 1997 emphasises that information is a powerful tool at the customer's disposal in exercising their right to good services. As argued by Rasila & Mudau (2014), there is a need for government to make sure community members are made to be involved in matters of their development. However, what is seen is South Africa can be argued that is gradually leading to the creation of dependency nation that will depend on government to do things for them while they are not active(Rasila & Mudau 2013). Persuading communities to stand up and become active citizens need effective monitoring of communication activities to make sure there is continuous improvement on the impact these activities are making. This will avoid repetition of activities that are fruitless as monitoring provides room for methodological corrections. In the past 26 years the South African government has repeatedly for example dedicate the month of August to send messages against women and children abuse. However, there is significant increased number of females and children killed during the month's celebration in 2019 compared to other years. Monitoring and evaluation is fairly new in South African Government. However, government in general has moved forward with the improvement of the monitoring and Evaluation since the establishment of the Ministry of Planning, Monitoring and Evaluation (DPME) in 2009. This department plays an oversight duty of monitoring government programme performance. Some of the tasks of this department is to investigate and provide direction in resolving communities' challenges received by government through the Presidential Hotline (Toll free number) and those from the provinces. They

travel to provinces and local municipalities where they rope in all relevant stakeholders to account on challenges as raised. These include poor infrastructure, lack of water and general poor service delivery. The DPME does not monitor how best or bad government communicates to the communities. They do not monitor and evaluate the impact of government communication services and its impact to the lives of the target audience, community members. Monitors and evaluators in government departments in general do not monitor and evaluate communication activities. This can be attributed to many reasons such as the fact that in many departments communication services activities do not even reflect in their Annual Performance Plans (APP). Communication is regarded as support activity and not a key activity. This makes it difficult for oversight bodies such as the Auditors to audit the government communication performance against expenditure. This may be attributed to lack of monitoring tool on communication activities. Therefore, as argued by Rasila (2018), communication becomes a by-the-way task which is done and treated as a peripheral activity. While communicators are expected to account for budget spent, they cannot even themselves account for impact their activities make to improve the living condition of the communities served. Rasila & Mudau (2013) argues that communication should be treated as strategic tool to persuade communities to be active citizens who are involved in government developmental intervention. This can be realised if at all the times communication activities are monitored and evaluated. Government communication strategies should be derived and anchored by the knowledge on how they are impacting on living conditions of the communities. In most of the time, performance indicators of communication do not have any impact on improvement of living conditions of the target audience. It can therefore be argued that unless government communication introduced measurable and smart indicators it will continue to spend communication budget with less or no impact derived. This becomes even more difficult for government messages to have impact on living conditions of people living in rural dominated areas who are also of higher levels of illiteracy

Community empowerment through effective communication

The constitution of South Africa (1996) posits that government, both local and national spheres have the duty to expedite the attainment of community welfare through increased services, empowerment of community members, encourage community participation as well as an increased competitiveness and also consider principles of democracy, equity, justice and the idiosyncrasies of the area. This will result in the civil society that is empowered to move towards the achievement of public order quality characterised by society independence, resilience and competitive power. This can be achieved through effective communication which is monitored and evaluated at all the times. Government messages should empower the communities in a way that people take control of their lives and have the power to shape their own future. Empowerment, as enshrined in the constitution, happens where the community members are active participants and are not made objects of variety of programmes. This is also echoed by Rasila & Mudau (2013) who argue that it is only when community members are empowered and are active participants in issues of their development that they will be empowered and achieve anticipated goals. Empowerment of the community members

by the government needs a strategy. Empowerment strategy therefore is characterised by the elements of:

- Persuasion- It is about making people change their
- **Compulsion** Provision of the situation in such a way that people are forced to indirectly change their attitudes.
- Pervasion repeating what was expected to be entered in a field of one's subconscious so that there is changing of the attitudes themselves according to what is repeated.
- **Coercion** Forcing directly a change in attitude by the existence of physical or legal matter.

The four element *supra* mentioned indicate that empowerment of community happens in stages. These are the preparation, assessment, implementation, evaluation and closing stages. This emphasise the fact that to be able to empower the community best, they have to be prepared through communication, then they are assessed or monitored through effective monitoring processes to make sure they are not left behind in terms of being active participants. Together with the community members, the state then use communication to start implementation of empowering activities. This stage will at all-time be subjected to effective evaluation. Bakewell, Adams & Pratt (2003) define evaluation as a periodical process to make sure the project is gearing toward achieving the set impact or change. The closure of empowering activity should also be communicated effectively.

The 10 basic principles of communication

According to the Government Communicators' Handbook (2017), all government communication activities are done for the benefit of the community members. This part of the study will summarise the basic principle with the aim of showing where current government communication is failing the communities.

- Government work is a public activity: Ordinary people must at all times be informed by activities of the government they have elected. This should be done with the aims of getting then involved so as the use the messages to improve their living conditions. There is therefore a need to create proper performance indicators.
- A central communication service should have authority to carry out its work- It therefore must be located in the highest office: All government communication must have its genesis and coordination from the highest office in government structure. This is to make sure that government communication does not lose the vision and mission of their political leaders. With current communication less from the manifestos of ruling party is limited and government after the other but not changing the message understanding and institutionalising by recipients.
- Political principals are the main communicators:
 Government communicators must in the main be done by individuals holding positions of political oversight or leadership. This means they have to be trained in communication matters but experts in communication including officials in their offices. Most of political leaders do not have a clue in communication and they do not feel comfortable to be inducted by qualified official as they claim knowing it all.
- Everyone in government is a communicator: Everyone working in government is indirectly a communicator and

must assume a role of an emissary and be positive representative of government. This is possible with effective internal communication. Unfortunately current government communication services fail to recognise the power of creating own ambassadors in training internal staff to know more about their departments so as they pass good messages in churches, homes, *stokvel* and many other places.

- Communication must be based on an integrated communication strategy and programme: The central office should come with main and all-encompassing communication strategy for the whole government. This assists in making sure government speaks in many voices but one or common message. Unfortunately there are less or no planning for a where government communicators where groomed to be able to communicate ONE message through their many voices. Take the e-Toll debate in South Africa as example, the current (2019) Minister of finance, Mr Tito Mboweni calls for road users to pay for services they are receiving while the Premier of Gauteng Province, Mr David Makhura calls for scrapping of e-Tolls. The two are from African National Congress (ANC) as political party and from one government of South Africa. This frustrates the community members.
- Communication structure does not determine policyThey articulate the policy: Government policies and
 priorities are predetermined, communicators are there to
 inform and accurately disseminate them to the public.
 Some communicators are suspended buy uttering
 statements that different from policy stands in many areas.
 Many do this through what they communicate in social
 media. Many also fail to differentiate between what they
 say when at the branch meetings of their political parties
 and at work space.
- Communication is more than just media liaison: You need to put all efforts and strategies to make sure message get to target audience. There is a need of being strategist and NOT only rely on media to do communicator's work.
- Currently communicators have shifted too much to use of social media and at times leave out the rural aged people who do not access social media. It seems as if face-to-face communication in government from all spheres is getting more and more limited except for mandatory ones done to escape the auditors.
- Direct communication and mutual exchange of views with public is the most effective form of communication: This suggests that there should be a communicator in all government institutions, of course also in business sector. These communicators should time and again be inducted on the changes coming with communication. Communication should be regarded as a science which is not immune to changes just like other sciences.
- There is a need to understand communication environment when working out campaigns and programmes: This suggests that research forms integral part of communication. Communicators should also learn to visit as many areas of interest as possible so that they have understanding of what is happening within the communities.
- Communication campaigns and programmes work best
 when they are carried out in partnership with others
 not in government: This means all important stakeholders
 can be recruited including those that can work as
 ambassadors of the campaigns or programmes. The number

of universities has increased in provinces across the country but there is less relationships made between government communicators and the universities. It is high time that government communication taps from the expertise the universities have.

Defining monitoring and evaluation

Monitoring is a systematic and continuous assessment of the progress on a piece of work/project/event or communication programme over time checking if implementation is as planned and allows for methodological adjustment. This means is only when a project is effectively monitored that implementers will detect gaps early and come up with interventions that are based on evidence. When for example a communicator who is strategic plans for a communication programme, they put a plan down and most important they base it on result-oriented systems making sure they understand the final intended benefits. Surely YOUTH Day event should not plan to have people attending the stadium and the final intended impact to drive from the programme but how the theme and messages of the year will be adhered to by intended recipients.

Evaluation on the other hand is periodical assessment of relevance, performance, efficiency and impact of work/project/programme or communication event with respect to its stated objectives taken at significant stages of a project. Taking Youth day of YOUTH month as a communication programme, evaluation can be implemented at the beginning of the programme by diagnosing existing challenges, then on 16 June (SA Youth day) evaluating implementation and perhaps after two month implementing Impact evaluation.

Application of Monitoring and Evaluation in government Communication

Monitoring and Evaluation on the other hand is fairly new in South African Government. Currently though, Government has introduced the Department of Planning Monitoring and Evaluation in 2009. The Department however, focusses more on other programmes of service delivery and not the impact or change brought by communication services activities. On the other hand, Government sees communication as part of management tool (Government Communicators Hand Book, 2017). Monitoring on Communication Services need to be a systematic and continuous assessment of the progress on a piece of work (Events Management e.g. Outreach Programe) over time checking if things are going as planned and allow room for methodological adjustment. Monitoring will ask questions such as, How much was put on the target programme, what will be done as activities to achievement of set goals and what comes out (Inputs, Activities and Outputs) (Bakewell, Adams and Prat (2003). Let us provide an example, The Outreach Programme is meant to make sure there is improved interaction between government and the community members where they share experiences. What monitoring will like to find out is weather the activity was conducted as planned and the outcome is then analysed to find if indeed it serves the intended purpose. On the other hand, Evaluation is described as periodical assessment of relevance, performance, efficiency and impact of work(Communication work such as Outreach Programme) with respect to stated objective (That of bringing community members closer to government). Evaluation will focus on the short term outcomes of the

project(e.g. In period of 3 years are community members free and able to access matters of governance?) and long term impact (e.g. Since implementation of the communication programme is there long term change in the relationship between government and community members at all sphered of Government?). Bakewell, Adams and Prat (2003) also argues that findings of Monitoring and Evaluation should be used by decision making structures, this suggests that findings in communication should serve at top management and guide the government on how best they can interact with the communities (Wotela 2017).

Challenges of Government communication in terms of evaluation

Lack of effective monitoring and evaluation in government communication is caused mainly by poor crafting of indicators. Month come and pass by and themes are celebrated but there is no impact seen on the part of the target audience. To assist communicators this book will take example of the youth month which is celebrated in June every year in South Africa. The main theme of the month will be **improving of living conditions** of the youth in the country. The main indicator crafted in government communication is: **Events attendance** which is counted by number of people gathering in a stadium or place of gathering.

Inputs: Resources are put in for adverts, transport, food, branding etc.

Activities: Speeches are delivered by political leaders outlining the wish lists for improvement of living conditions of the youth. People are transported and food is arranged

Output: People gather in numbers and communicators get a pat on their back. Both political leaders and administrators rejoice seeing the great number of people. This stage is regarded as the end of the communication process.

Outcome: Outcome is the medium term benefit that comes after use of resources. When the people leave the stadium there is a need for monitoring on how best they are going to internalise messages delivered. This does not happen in government. All focus goes to plan for other events and themes of the following months.

Impact: This is the long term change that comes with a project. This is where it has to be seen that resources, activities and the attendance(output) was not for nothing There was supposed to be tangible results such as seeing living conditions of youth improved following delivered message. As things stand, communication process is one of the huge spending that is not reaching to the maximum benefit. Using the impact indicator it can be argued that government communication should be changed or will remain WASTE of resources. However, in output basis it can be argues government communication is measured currently by the number of people attending events and it brings good results in gathering people.

However, other people can argue that this means communication process is not aiming at changing or improving living conditions but it is just a GAME each department plays. Government communication need to start applying different types of communication with the aim of remaining effective and producing impact full results. The diagram below shows some types of evaluation:

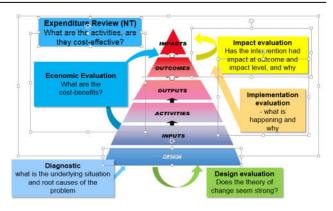


Diagram 2. Types of evaluation (Source: National Evaluation Policy Framework, DPME, 2019)

Main focus of the study

This study was conducted to probe how best government communication processes can be improved through effective monitoring and evaluation. It also suggests how communication can put measurable indicators.

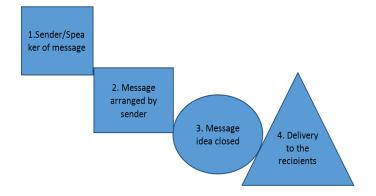
FINDINGS

Government top-down communication lacks impact.

South African Government has communication themes for each of the month of the year. These themes are celebrated and used to remind the society of consented plans to achieve a certain reality. Some of the themes are as follows:

Month of the year	Main theme	Anticipated results
April	Freedom month	Celebrate and embrace freedom and leave as one nation
June	Youth month	Outlining plans to improve living condition of young people.
August	Women's month	Emphasis on respect to mothers of the nation and stop abusing them.
September	Heritage month	Reminding all not to forget their heritage
December	Reconciliation	Living together as one nation even though we differ in race, language etc.

During these events, people are gathered in different areas where they are addressed by government leaders. The events start from the local sphere building up for the national events which are addressed by the president of the nation. During these events concreate plans are outlined by government leaders in line with the monthly themes. Communicators use different communication platform to distribute the message. The message is therefore sent from government to the people. Communication process therefore takes the Top-Down structure. This communication flow is known as Aristotle Model of communication (Mortensen, 1972).



In this communication model the sender of the message or speaker arrange the message, close the idea and comes with ways of delivering the message. This suggests that there is little participation from the recipient. All they do is being transported to the venue, sing own songs and get the speech delivered by the political and government leaders, get food and go back home. The fact that there is little or no role recipients do in the communication process makes these recipients alienated from the process. They grab very little from the speeches delivered hence they do not get converted to the direction the speaker intends. An example of message lacking real impact is the resources used during the August month where a call is made to refrain from abuse of women and children. Despite all the efforts, women continue to be raped and murdered. Uyinene Mrwetjana, a 19years old student of the University of Cape Town is one of the women who were killed during the month of August 2019. She got missing on the 24th August in the hands of a male employee of the South African Post Office. She met her fate when going to collect her parcel from the post (DaillyMaveric, 4th September 2019). Despite arrangements of different themes to be communicated to the nation, women continue to be murdered. South African Government has been making the call for the past 26 years (since the dawn of democracy) but it is believed that a women is murdered in every three hours in South Africa. SABC News (25 November 2019 reported that a female learner, Precious Ramabulana from Capricorn TVET College, Ramokgopa Campus in Limpopo province who was raped and killed on this day. This is the day South Africa launches an annual campaign called 16 days of activism against women and children abuse. It seems this top-down communication is failing in persuading abusers to stop abusing women and children. The type of communication that is needed should be the one with compulsion.

Communicators obsessed by promoting political leaders.

One observation in government communication is that communicators are more obsessed of praising their political leaders instead of focusing on delivering key messages. This is seen from most of the government statements which are mainly started by words such as:

- MEC Masemola delivers Government's message of support to the Twelve Apostles Church in Christ (Lim Comm Forum WhatsAP group, 24 November 2019)
- President Cyril Ramaphosa will launch District Development model and the commencement of the annual Campaign of the 16 Days of Activism for No violence against Women and Children..... what a loaded and long media statement headline?
- Ministers of health Dr Zweli Mkhize and Limpopo Health MEC Dr Phophi Ramathuba to launch CT scans and PACS/System in Waterberg(24 November 2019)
- Social Development MEC Mme Nkakareng Rakgoale is today at the full gospel Churche in Lulekani......
- Limpopo's Department of Agriculture and Rural Development MEC Mme Nandi Anna Ndalane is today......

In doing this communicators at times forget to emphasise the main message and keep narrating on the trip the leaders will be travelling e.g. He/she will address people there and drive to the other venue to address the people on other matter....They do not exactly give key points on what will be discussed, for what

benefit and what is expected from the recipients of the message. Media statements and speeches delivered by government communicate to the originators than the recipients. This is even worse in social media where messages have to be shortened. Some end up posting statements such as "Minister ofwill visit the people of rural dominated Giyani area where there is challenge of lack of water. This statement does not indicate the core of the message that is making the minister to ascend to the rural area of Giyani area. People already know there is draught and anticipate promises of hope.

Communication setting output indicators.

The reason behind the development of monthly themes in South Africa can be regarded genuine. This is the country that was characterised by divisions based on race and colour. In general, the majority blacks were supressed by apartheid regime. On the other hand, oppression was also experienced between people of same colour. Women for example were oppressed by fellow males. The democratic government of South Africa established the committee to look at how government communicate to its people. This was done as a way to limit excessive power that was given to government communication which was not fair, transparent and geared towards building united society. The establishment of the COMTASK was the beginning of transparent government communication in South Africa (Rasila, 2018). This communication Task Team focussed more on making sure government communicate to its people in a transparent and developmental way. This includes making sure messages shared empower community members and allow them to determine their developmental agenda. The unfortunate part is that communicators seem to create output communication indicators. Communication is regarded once off event that happens and get forgotten. Going back to the cited example on August month theme, communicators such as the political and government leaders prepare speeches encouraging in particular mails to stop all kinds of abuse to females. Come the end of August the focus changes to the September theme, that of celebration of heritage. There is no monitoring of what the leaders committed to achieve. There is lack of compulsion and pervasion in owners of the message. They seem to just dump the message and proceed to other messages without any mechanism of monitoring and evaluating with the aim of realising the end product. This makes messages of government to lack the anticipated persuasion where it can be of coercion and change the target audience ways of living.

Inputs: Government communication need resources such as funds to publish to media, usage of posters and other activities.

Activities: There will then be advertising, gather communities to be addressed by the political leaders.

Output: Communicators and political leaders get satisfied when events are attended by multitudes. This is the indicator government communication justifies its achievement. Speeches are also directed to this level. It is not the number of people who attended that needs to be used as a scale to measure success of government events, there is a need to go further than this.

Outcome: What does the communication process provides over medium term period. Here it is expected that community will start having some levels of respecting women within their

society. The theme of August month will then be getting fulfilled. Increase on violence to women cannot be expected if indeed the messages were persuasive and are monitored after the celebration day. How the message was received also plays a role in keeping the momentum. With this there will be changes coming as Impact of the message. Impact indicator will be that community will change and there will be no more abuse to women if using the August month theme. This can be experience even in other themes as long as communicators and other government stakeholders plan together in creation of impact communication indicators.

Communication need anchoring by programme managers.

Communication is a support function. This is because communicators in government communicate all government programmes, policies and projects with the aim of making sure community members understand and become part of the programmes and policies. Communication breaks the gap between government and communicators. However, this type of communication should be done in a developmental manner. Developmental communication is that communication that gives people messages they can use in developing their living conditions. Messages should be useful to the recipients. Communication services in government does not articulate policies, they articulate policies. This suggest that they are not implementers of all other programmes government carry to improve lives of communities. It is therefore important for other sectors of government to support messages communicated to the communities with the aim of bringing in compulsion, persuasion and coercion to make sure community members get to use the messages and change accordingly in line with the call by such messages. Taking August theme as an example, political and government leaders should first bring together all relevant stakeholders such as law enforcement, community structures, religious and cultural structure and plan together with only one indicator in mind: There must be significant change and we realise the end to women abuse. This can be done in all other themes. Then all stakeholders keep doing what is in their mandate in regard to commitments made and start winning the minds of community members through implementation of effective monitoring evaluation. Government should also stop treating its communities as passive recipients of information by not considering them when planning messages and demand to just pass messages to them. There must be a way to engage communities more often even before delivering speeches, social media messages and others. Government messages must be more on what are benefits to the communities and not limited to praise the political leaders. The messages must also be clear on what government is expecting people to do

Conclusion

It is clear from experience that government is spending resources in communication processes but there is no clear impact brought about by the communication process. It is clear when monthly themes are communicated year after the other and minimal positive reaction is realised.

This can be solved by infusing matters of Monitoring and Evaluation (M & E) in communication. There is a need to have measurable impact indicators in communication. These indicators should also be included in the Annual Performance Plans (APP) of all departments. Communicators always will argue that communication should be regarded as a management tool. Indeed if activities of government are not communicated they will not be known. Unfortunately in many of the government department communication does not appear in their APP's but relegated only to the Operational Plans and monitored and evaluated by no person.

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