



Observations on the **National Education Policy 2019**

SUBMITTED TO



MHRD

Government of India
Ministry of Human Resource Development

सत्यमेव जयते

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INTRODUCTION

In January 2015, the Ministry of Human Resource Development (MHRD) initiated the process of developing the National Education Policy (NEP) for our country. It released the latest version of the draft on 31st May 2019 for public comments and this document is in furtherance thereof. While the initial 30 day period that was granted to the public was thereafter extended for an additional 45 days, it is pertinent to note that the drafters took over four years before they submitted the current iteration of this report to the Government in December 2018, whereafter the Government took another five and a half months before releasing the same to the public.

Our overarching comment is that while the policy is 484 pages long, it does not contain the depth and context that is critical for deploying a policy of such national importance.

Though it is not directly relevant to the more substantive comments contained hereinafter, it is pertinent to note and place on record that the official press release by the Government incorrectly indicated that the report was submitted by the committee to the Government on the 31st of May 2019, which is clearly contradicted by the committee's letter to the MHRD dated 15th December 2018.

Our overarching comment is that while the policy is 484 pages long, it does not contain the depth and context that is critical for deploying a policy of such national importance.

This document aims to highlight the various concerns and suggestions that we hope will be addressed and considered by the committee before India can put this policy in motion.

Our document henceforth makes suggestions and asks for clarifications for the same purpose.

NOTE ON STRUCTURE USED FOR COMMENTS

When we began the process of analysing the entire report, we started with preparing paragraph by paragraph notes. However, in doing so, we realised that it may lead to a situation where a lot of the critically relevant points may get buried under all the other critiques, suggestions and queries that almost every sentence in this policy elicits. Thereafter, we moved to covering the policy on a section by section basis and there too, we faced similar issues. Finally, in the interest of ensuring that our comments are focused and to the point we have highlighted the broad concerns for each identified issue.

We would like to offer our assistance for a detailed discussion on any of these identified concerns in order to ensure that the drafters have full context behind our notes.

Before we proceed with listing down these concerns, it is important to summarize the reasons why a paragraph by paragraph response was not made possible due to the manner in which the policy has been drafted.

1. The main text of the policy is accompanied by more than a few adjectives that result in confusion regarding the aim and standards that the policy seeks to fulfil. An adjective serves the purpose of attributing a characteristic, descriptor, or differentiator for the word it is used to describe. This leads to questions throughout the document as to how one needs to read the use of these adjectives in the extremely sensitive and/or serious contexts in which they are used.
2. The policy has on many occasions made references to being applicable for certain sets of individuals, organisations, and institutions without clarifying whether that specific direction is applicable universally or restrictively. This issue is highlighted because of the many places where the policy uses similar words and descriptors even though they clearly refer to different stakeholders.
3. Though the policy states the overarching objectives and presents statements of facts, it is also compounded with visionary statements and opinions. This may prevent the readers and perhaps even the implementers from distinguishing between the two. Many sections contain either just one of the above or more than one in differing orders from section to section.
4. Given the far reaching consequences, interpretations, and both direct and indirect impacts of almost each line of the policy, the 75 day period provided for public review cannot be deemed to be sufficient for a 484 page report that took four and a half years to produce and which will be in force for at least the next two decades.

We hope the intent behind our approach is taken in the spirit in which it is intended, i.e. in order to provide meaningful comments for furthering the policy sought to be implemented.

Hereafter, we proceed by first highlighting our core submissions regarding procedure. Second, we highlight the presence of, and suggestions for, the rampant shadow economy in the primary, pre-primary and secondary school, and higher education institutions. Finally we highlight the specific points of the policy for school education and higher education institutions which we believe need special attention.

CORE SUBMISSION ON WAY FORWARD

Our core submission is more towards the procedure which should be adopted for moving forward with the Government's initiative of developing the NEP rather than all the troubling substantive comments that will follow in this report. Given the ambiguity surrounding the policy, we recommend the following next steps:

1. The drafters must be asked to make public all of their notes and materials that they have used in order to finalise this report. This is because there are many places in the report that indicate the existence of context which is otherwise clearly missing from its text. Therefore, in order to fully appreciate the intent of the drafters, it will be important to have access to everything they considered while drafting this report.
2. A public question and answer session needs to be organised where the drafters are made to answer the queries of the public in a sentence by sentence format based on all similar questions being clubbed together in advance.
3. Once the intent of the drafters has been clarified, it is imperative to establish a dedicated and full time working committee for the purpose of ensuring a well thought out National Education Policy, keeping in mind the following points:
 - i. The full-time committee should convene on a daily basis for a twelve month period.
 - ii. Each week during their tenure, there should be mandatory open days for public interaction including context setting, queries and suggestions.
 - iii. The progress of the committee and the open days should be recorded on a public forum on a real time basis.
 - iv. This twelve month period should be structured in order to ensure timelines are being adhered to and each relevant section receives adequate time, attention and care.

The drafters must be asked to make public all of their notes and materials that they have used in order to finalise this report.

It is our humble submission that though a one year additional period for the finalisation of this report may sound unreasonable, however given the current state of the policy and the impact that is bound to have on India's young workforce, it is crucial to get this right.

HIGHLIGHTING THE SHADOW ECONOMY

Before we move on to listing down our concerns on the suggestions made by the policy, we would like to submit a concern that is applicable to the entire policy i.e. the fact that the policy does not recognise the shadow for-profit economy that is rampant in the education sector. It is stated on page 401, “this Policy is unambiguous and explicit that education must be a not-for-profit activity and enterprise in society,” yet it does not acknowledge the rampant shadow economy which fearlessly runs education as a for-profit business. In fact, subject to the drafters clarifications, the policy may end up encouraging the growth and legitimisation of this shadow economy.

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1. Pre- Primary School

One of the key objectives of the NEP is to make education compulsory even at the pre-primary level. This endeavour is well appreciated and would perhaps have been the best outcome of this policy, had the policy recognized the dominant role that private ‘for-profit’ pre-primary education centres play in this regard.

This omission may suggest that the status quo of pre-primary education centres being privately run as for-profit enterprises is preferred. That by itself may not be alarming, as parents always had a choice whether to avail the services of these commercial establishments or not. However, the new policy enforces a diktat for all children to enter into pre-primary centres, without acknowledging the existing paradox. This resembles the numerous times an industry has lobbied for the promotion of financially gainful policies without fully comprehending its repercussions.

The drafters may point out here that the Government will step up and establish pre-primary schools to cover this gap. However, despite the Government’s initiatives, the private sector will inevitably be dominant especially when they can legally run the pre-primary centres for-profit.

2. Primary and Secondary Schools

For primary and secondary schools specifically, it has been well documented that students across the economic strata are prompted at all levels to undertake private tuitions. Often, these tuitions are imparted by their own schoolteachers. This issue, arising due to a conflict of interest, has not been specifically addressed by the NEP. Furthermore, the granting of autonomy to schools and boards to determine the structure and content of their curriculum may give schools and teachers ammunition to deviate from the set norms and latently drive more and more students towards having to avail private tuitions.

Resultantly, the teachers would end up charging an additional fee to discharge the same duties that they are being paid to do during school hours.

This would lead to the further aggravation of students taking private tuitions after school hours. Resultantly, the teachers would end up charging an additional fee to discharge the same duties that they are being paid to do during school hours. Thus, giving schools the autonomy to customise their curriculum could potentially worsen the problem of private tuitions.

In our opinion, it should be of note that Section 28 of the Right to Education Act (RTE) 2009, which explicitly states that teachers are not allowed to engage in private tutoring, has not taken care of this problem. Evidence of this can be found in public records. In the case of Renganathan Vs. The state of Tamil Nadu and Ors., the Madras High Court had to acknowledge the presence of private tutoring by teachers and reiterate its illegality. This instance occurred despite the case titled “Society for Un-aided Private Schools of Rajasthan vs. Union of India & Anr., in 2012 where the Supreme Court judgment sided against private tutoring by school teachers. This phenomenon continues to be even more prevalent in states like UP, Jharkhand and Delhi, amongst others. A different, but related example of rampant private tutoring in the education system is in the city of Kota, where students get enrolled in ‘dummy’ schools only as a formality while attending tuitions and coaching centres during school hours.

While utilising school teachers for increasing the capacity for delivering education, albeit through tuitions, may not necessarily be a bad idea, it may be imperative to at least disallow teachers, whether public or private, from tutoring students from their own schools. This would compel them to discharge their duties effectively within school premises and during school hours. This is already practiced by some urban private schools and concretizing it into a government law coupled with effective enforcement will ensure that this practice reduces.

3. Higher Education Sector

As we get into education at higher age groups, we are of the opinion that the NEP may have the presumably unintended impact of becoming an enabler for an industry that does not find mention in the policy at all. The draft proposes entrance tests through the National Testing Agency (NTA) in section 4.9 for admissions in universities with the idea that it will reduce the burden of ‘high stakes’ 12th Board exams. These varied entrance tests for different universities are also intended to reduce dependency on coaching classes and tuitions.

However, we are of the opinion that this may not achieve the desired result. We believe that entrance exams would make students more dependent on coaching centres for the stated tests. Since, coaching centres are for-profit and thrive on the divergence between school and entrance exam curriculum, they will either increase, or continue to prosper unhindered.

Furthermore, since policymakers have not adequately addressed the presence of these

'profit-making education enterprises', we believe that they would be unable to send out a strong message regarding their intolerance. In our opinion, the NEP only hints at the existence of for-profit educational institutions and effectively stops there. This, we believe, will lead to one of two situations. First, either the violators will continue to fill their coffers, or the second, which is more hopeful, that educational czars will fall in line with the 'not-for-profit' objective, make do with their profits so far, and perhaps find different ways to get around the system. We believe that clearly addressing and regulating the NEP could have, at the very least, barred violators from the education industry, if not return their loot.

The need of the hour is to have a past and present public audit of all the private universities and other for-profit educational institutions and centres, where the onus to prove that they are not-for-profit is on them, rather than the other way around.

The need of the hour is to have a past and present public audit of all the private universities and other for-profit educational institutions and centres, where the onus to prove that they are not-for-profit is on them, rather than the other way around. We are also of the opinion that more clarification is required with respect to HEIs having entrance exams for students, as well as having the autonomy to decide their own criteria for admissions.

COMMENTS ON SCHOOL EDUCATION

Let us now proceed with specific comments on some of the areas from within the policy that would require special attention:

1. Course Structure for School Education

1.1 Foundation Course for Pre-primary Education

The drafters have correctly identified that a large number of school dropouts are because of a massive gap between the curriculum of the primary school as compared to the currently unregulated pre-primary years of age 3-6. What appears to be a backup plan of running a foundation course before children enter primary school has the potential of being inadequate and may also lead to continued lower levels of education being imparted at the pre-primary level due to the dependence on the foundation courses. It is critical for the policy to acknowledge remedial and punitive measures for pre-primary setups that do not ensure adequate education at that stage.

NEP Reference: Chapter 3, Page 65.

1.2. Increase in Subjects Without a Change in Corresponding Structures

The policy includes numerous positive introductions to the schooling curriculum which will aid in the holistic development of children at the school level. It is, however, worrisome that the practicality of imparting education in all these identified areas of art, culture, languages etc. escapes detail even on a thorough reading of the policy as it stands. It is important to understand the mindset of school students towards classes that (a) do not have a meaningful impact on their grades and (b) that are not a relevant part of the curriculum. It is here that the lack of school teachers on the consultative panel, appears to have caused a large gap between the vision of the drafters, and the reality at the school level.

NEP Reference: Paragraph 4.4, Page 78.

1.3 Sports in School Curriculum

The policy introduces the inclusion of sports in the curriculum to develop different skills for students. We are extremely appreciative of this for it would help all students reap the benefits of sports. Beyond physical well being, we believe sports can also help students with anxiety, tension, responsibility, teamwork and overall mental well being as well.

However, in order to ensure that every child benefits from the above mentioned aspects

of sports, the comparatively low participation of girls in sports activities needs to be addressed. We suggest that policy measures be taken to ensure an additional step for encouraging the normalisation and equation of the participation of girls in school sports. Additionally, we believe that sports should be developed as a fertile field for the reduction of discrimination based on religion and caste.

Sports also provides an opportunity to inculcate the concept of nutrition in school children. This would ensure that students can understand and practice a sustainable and healthy lifestyle. However, we also strongly recommend that alongside theory, physical exercise maintains its importance for all students so as to ensure an upkeep of interest and physical health.

Overall, we believe that the implementation of sports be treated as a subject with multifaceted benefits.

1.4. Census Examination

The drafters propose the introduction of nation wide common examinations at grade 3, 5 and 8 in addition to the board examinations. It is not clear in the policy as to how these examinations will be carried out. The policy drafters acknowledge the impact of board examinations and the stress that they cause students. Post this acknowledgment, for the drafters to add to the stress of the students through census examinations at the Grade 3, 5 and 8 levels, is highly counter productive, unless the results of these census examinations will not be revealed to anyone, including the children or their parents. We would like to make a special note here that merely declaring the results privately will also not be adequate as the expectations and pressure flows from parents and the students themselves above all else. Therefore, the declaration of results, either publicly or privately, will have an irreparable impact on the Indian education system.

NEP Reference: Paragraph 4.9.4, Page 107.

1.5. Critical Thinking Treated as a Consequence not a Skill Set.

The draft policy makes the development of critical thinking as one of its core objectives. We believe this to be an important step, for the outcomes of critical thinking such as, intellectual growth, self-development, improvement, continuous seeking of knowledge, and examination of subjective perspectives are extremely important. However, the absence of a focused plan which includes classes on how to think critically, lateral thinking and debating techniques is missing. While the policy makers have made positive remarks around the type of holistic education that should be imparted in schools, their assumption that the same is enough to develop a culture of critical thinking is only the first step of what should've been a more robust and thoughtful strategy, deployed keeping in mind the existing curriculum and

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student capacities to inculcate the same. To be clear, in our opinion concepts of critical and lateral thinking can be easily taught through a defined syllabus and teaching techniques. Without the same being envisaged it seems that the drafters have failed to back their visions and claims with the required thoughts, insights and space in this 484 page report.

NEP Reference: Paragraph 4.3, Page 77.

1.6. Promoting Talent

The drafters have laid down a vision for spotting talent in areas other than the core subjects taught in school without providing for any sort of guiding principles or a framework through which talent can be systematically spotted. Here also there are well founded techniques that are implemented in order to spot, nurture and promote talented prodigies in both academic and non-academic areas. This theme of narrating a vision without adequate plans or even direction for achieving the same are writ large throughout the policy.

NEP Reference: Paragraph 4.10, Paragraph 4.10.1, Paragraph 4.10.2, Pages 110-111 .

2. Language Policy

2.1. Five language formula?

The 3-language formula has received quite a bit of coverage in the media as well as notes authored by academicians over the past 2 months. Our concern stems from the fact that what emerges from the policy is the possibility of students being made to learn 5, not 3 languages at a given point of time during their years in school. The draft proposes the introduction to India's traditional languages as well as a foreign language in addition to the 3 language formula. While language skills are central to the development of cognitive abilities, the imposition of 3 languages at the formative level has the potential of becoming unimplementable or overbearing for the children.

NEP Reference: Paragraph 4.5.5 on Page 83

2.2. Side lining of English

While we appreciate the intent and reasoning because of which the drafters have promoted the use of local languages for imparting education in schools, we are also mindful of the larger systemic changes that are necessary across India for this to be a viable option for children who are aiming to become a part of white-collar India. While English is the preferred language for almost all white-collar jobs including government jobs, the drafters do not make mention of how their

While English is the preferred language for almost all white-collar jobs including government jobs, the drafters do not make mention of how their suggestions will have an impact on potential employability of these students.

suggestions will have an impact on potential employability of these students. Our hope would be that even blue-collar workers are afforded the opportunity and educational pathway for moving towards white-collar jobs or more importantly increase the value and respect of blue-collar jobs.

It seems that the drafters are underestimating the global influence of the English language and it will be important to understand why the drafters have taken a stand that English is not as important as it was thought to have become during the 1960's. By itself, the promotion of regional languages is an idea well appreciated and we do not make any claims as to which language needs to be given prominence in the respective states and regions of our country. It is imperative, however, for this change to be made at the administrative/corporate/judicial/legislative and other similar levels before being propagated through the education system without first providing the students with a conducive ecosystem that ensures equal opportunity irrespective of language biases.

NEP Reference: Chapter 4, Page 81 and Page 82

2.3. Transition from the Mother Tongue to English

Furthermore, the drafters also seem to underestimate the shift from imbibing education in their mother tongue to textbooks and teaching in English at a later age. In our opinion, the correct approach would be a model where dual language education is imparted, allowing for a more natural and organic way for students to both adapt to the English language, as well as, imbibe the essence of the education being imparted to them in their local language. It is ideas and thoughts such as these that are sorely missed throughout this policy and therefore the need for the twelve month consultative process as envisaged in the initial pages of this document is crucially needed.

NEP Reference: Paragraph 4.5.1, Page 80

3. Teacher Based Policies

3.1. Teachers Removed from Administrative Duties

The policy makes it clear that school teachers shall only focus on teaching and should not be distracted with the administrative duties that they currently engage in as part of their job profile. While this potentially may be a positive move in the long run, it does not account for the tremendous value that teachers bring to administration because of their deep rooted and practical understanding of both pedagogical structures as well as child psychology. This recommendation by the drafters would be acceptable if they had also proposed that the administrative tasks be conducted by teachers with teaching experience who want to shift their job profile. Additionally, a proposal to increase the pay scale of teachers to

It does not account for the tremendous value that teachers bring to administration because of their deep rooted and practical understanding of both pedagogical structures as well as child psychology.

undertake administrative responsibilities as well would have been welcomed and allowed for just reward to the teachers to aid in tasks which require their unique skill sets. This understanding of the relevance of teachers in administering schools seems to also highlight the previously pointed out fact that no school teacher finds mention in the list of consultations referred to in this policy.

NEP Reference: Chapter 5, Page 116.

3.2. Mentor Training

The policy has made an excellent suggestion to initiate internship programmes for teaching students to gain experience in real classrooms through senior teachers. Whilst this is a deeply appreciated step, we believe that the policy drafters should make a mention of training mentors in order to ensure that the interns receive quality structured training from their mentors. This may be a case of the drafters having thought this through and having made assumptions on behalf of the readers of this policy as to how their suggestions will be interpreted and actioned upon. However, we believe that clear roadmaps are required to ensure that policies such as these are carried out efficiently.

NEP Reference: Paragraph 16.9.3, Page 308.

3.3. Involvement of Social Workers

The policy seems to be giving mixed signals with respect to the involvement of non-permanent teaching staff i.e. ad-hoc teachers and para-teachers while promoting the deployment of social workers for assisting and imparting education. The drafters have missed out on laying down adequate measures for assessing the capabilities and capacities of the social workers or rules and regulations governing their quality and methods.

NEP Reference: Paragraph 7.2.3, Page 162.

3.4. Teacher Communities

Another facet of a successful education system that we believe the drafters should focus on is the absence of teacher communities in either school complexes or at the district, state or national level. Continuing on from the underestimation of school teachers that is rampant throughout this policy, it is not unexpected that a forward thinking idea such as this will be missed by the drafters. To elaborate, today's world is experiencing generational shifts faster than ever before where the levels of awareness, knowledge, and behaviour changes almost every two years and therefore making it critical to involve teachers at every stage to discuss and share ideas for improving the manner of imparting the prescribed curriculum.

4. Autonomy for Schools

4.1. Increased Autonomy may lead to Increased Discrimination

At present there exists large scale differentiation between schools that are considered good and those that are considered sub-standard. This, in spite of the fact that schools of the same Board abide by the same curriculum and pedagogical practices. The increase in autonomy will lead to further discrimination between students from schools considered to have developed better curriculum and pedagogical practices. We understand the need for allowing schools to teach in the manner that they deem appropriate for their students, however without the commonality of the above mentioned factor, the differences between schools may only increase.

The increase in autonomy will lead to further discrimination between students from schools considered to have developed better curriculum and pedagogical practices.

NEP Reference: Paragraph 9.3, Paragraph 17.1.20, Page 318.

4.2. Autonomy may lead to Increased Fee

In continuation of the previous point it is also important to note that autonomy in curriculum is one of the easiest ways in which schools can justify an increase in fee by referring to curriculum or pedagogical changes that it has affected in furtherance of this policy. In today's India where schools are repeatedly finding ways to increase fees, the policy may end up providing them with ammunition for this purpose.

NEP Reference: Paragraph 17.1.20, Page 318.

5. Under Represented Group

Even if the concerns raised by other critics of this policy as well as the points mentioned above are matters that can be clarified and/or corrected, a major concern stems from the belief that appears from the tone of the drafters' language throughout the chapter on URGs and everywhere else in the policy where URGs are mentioned.

NEP Reference: Paragraph 6.5, Page 150.

5.1 Madrasas and other religious institutions

A quick look at the paragraph that speaks of Madrasas and Gurukuls is a prime example of the supremacist mindset that has become so common in today's India. Paragraph 6.5.2 identifies Madrasas and Gurukuls as 'religious schools' and goes on to use a play of words which is better suited in a salesman's playbook. The drafters begin with speaking of how Muslims are under-represented in schools across the country and how it is the duty of the country to correct that. They go on to propose the setting up of 'excellent' schools in Muslim dominated neighbourhoods. The use of the word 'excellent' has been highlighted because as

with many other places in the NEP, adjectives are used without prescribing meaning, leading to ambiguity. In Paragraph 6.5.2, the drafters go on to say that Madrasas 'may' be encouraged to continue with their traditions and pedagogical styles, while they 'must' integrate the curriculum suggested by the National Curriculum Framework and that the teachers in the Madrasas 'will' be upskilled to teach science, math, social sciences and languages through the pedagogical practices set up under the NEP. The use of the words, 'may', 'must' and 'will' are telling and cause great concern that goes to the root of everything that our Constitution stands for. While many may say that it is a good step, the imposition and the manner of the imposition is highly disturbing and in light of everything else in this policy that has been written about over the past month or so, secularism and liberalism continues to evade today's India. Some may call this an unnecessarily reading between the lines and attributing intent, where none exists. If that is the case, then we believe that the policy drafters would benefit from a more clear and articulate language when finalising the policy.

5.2 Tribunals, LGBTQ and Others

Transgenders find mention, but the LGBQ don't.

The chapter dealing with URGs speaks separately of tribals and correctly identifies that the prescribed curriculum needs to be contextualized in order to make it more relatable for them. However what is missing is

how the rest of the students in the system should relate to the tribals. Missing out on this important piece of putting in the effort to harmonize the opportunities and acceptability of the underrepresented with the represented should be unacceptable given the lack of trust that already exists in our country. A similar approach of making exceptions for the URGs while ignoring steps for promoting inclusiveness is rampant throughout the chapter and policy. Transgenders find mention, but the LGBQ don't. These examples have the unfortunate and hopefully unintended impact of making the policy's focus to be too segregated and not integrated. Surely, their steps are positive, but given that this policy is going to dictate the Government's efforts over the next several decades, their efforts may be viewed as inadequate with the unfounded expectations of gratitude from the URGs.

NEP Reference: Paragraph 6.5.2 and Paragraph 6.7.1.

6. Core Issues Concerning School Dropouts

6.1 Re-enrollment of dropouts

While the policy has mentioned various reasons for children dropping out of school, they do not deal with the current problem of school dropouts whose education can still be salvaged if immediate action is taken over the next decade. Given that this policy has set out a two decade objective for its operation, we believe that there is a need to account for this significant percentage of our population. In our opinion, the policy needs to focus on the softer reasons for dropouts rather than just stressing on increasing infrastructure. Thus, we suggest that more effort related initiatives such as mobilizing the district administration and other social networks in be taken in order to tackle the softer reasons for dropouts such as child labour, child marriage, loss of parents etc.

NEP Reference: Chapter 3, Page 66.

6.2. No Acknowledgment of both medical and sanitary needs of a girl child

An important issue not addressed by the drafters is that they have given a complete miss to the sanitary and medical needs of the girl child which is often a major factor for their dropping out of school as well as reduced confidence levels. Addressing this issue is key due to its impact on a large part of Indian society. We strongly urge the drafters to acknowledge this point and make specific mention of steps which they will use in order to combat this reality. On this point we would further urge the drafters to make provisions in this regard that are extended to all levels of education including at the highest levels and not just in school.

They have given a complete miss to the sanitary and medical needs of the girl child which is often a major factor for their dropping out of school as well as reduced confidence levels.

6.3. Zero Acknowledgment of Sexual Abuse Law

Sexual abuse is another issue that we believe policy makers should make note of. According to various reports, a majority of child abuse cases are from schools. Identifying the exact number would be next to impossible, with children often going through such horrifying crimes but lacking the ability to understand what has happened to them. We strongly believe that mechanisms of awareness, complaints and redressal should be created for schools.

6.4 Acknowledgement of Mental Health

We are of the opinion that mental health should be addressed beyond the provision of counsellors. We believe that effective steps are necessary to provide information for mental health and furthermore ensure an environment that makes the existence of mental health normal. This would not just require educating students, but training teachers with respect to dealing with mental health students as well. Counselling should also be provided to parents to give them suggestions regarding personal and school growth for their children. Furthermore, information regarding mental health issues should be introduced in school curriculum to help the student in question and their peers to deal with such issues with sensitivity. Finally, effort needs to be made to identify certain actions such as bullying, sexual abuse and puberty, alongside others, and combat them in order to avoid their negative impact on the mental health of students.

7. Operational Concerns

7.1. Expanding Mid Day Meals and Nutritious Breakfast

The policy raises concerns over the drafters' vision of providing nutrition through mid day meals and breakfast to children in public schools by making a rather callous remark that a nutritious breakfast could be "even just some milk and a banana". However well intentioned, the dichotomy in the language used and the description given of a nutritious breakfast begs the question of whether the drafters are benchmarking against today's

unfortunate reality, or whether they truly believe that “even just some milk and a banana” should be how a nutritious breakfast is defined 20 years from now(?).

NEP Reference: Paragraph 2.1, Page 58.

7.2. No Detention Policy

This policy, in no uncertain terms, has declared that there should be no detention of children in grades up to grade 8. We believe that the drafters need to acknowledge the years of debate as well as the Government's will to reverse the no detention policy as mentioned in the RTE Act. For a highly critical policy change, the drafters have dedicated just 50 words from amongst the 484 pages of other text. It is perhaps again pertinent to note that amongst all the consultants mentioned in this policy, not even a single school teacher has been acknowledged to have given her/his inputs. This in spite of school education being a significant part of the NEP.

NEP Reference: Paragraph P8.4.2. (e), Page 195

7.3 30:1 Pupil Teacher Ratio (PTR)

We are greatly appreciative of the drafters' aim of achieving a 30:1 PTR, however, it is noteworthy that this endeavour will require a tremendous increase in both infrastructure as well as manpower. Therefore, in our opinion, an alternate plan and roadmap should have been forthcoming. At present there are numerous schools in the country, including private schools that operate at a PTR higher than 30:1 and continue to provide a better quality of education than their peers due to various techniques that allow for the same. It would have been ideal for the drafters to have considered these techniques and promoted them in order to bridge the gap between now and the time when Indian schools have the capacity to cater to a 30:1 PTR.

NEP Reference: Paragraph 2.14, Page 63

7.4. No Internlink With Existing Programmes

To reiterate, while increasing the spend on education is a welcome move, concerns flow from the magnitude of the proposed spending, especially where there are visible alternatives or at least supplementary efforts that could have substantially magnified the impact of the NEP. For example, large scale campaigns with huge funds and administrative machinery like 'Beti Bachao, Beti Padhao' and 'Khelo India' are not even mentioned in the draft, even as a passing reference. The Indian administrative infrastructure from existing departments with the relevant ministries, government schools, and even the district administration have already been geared towards making the existing initiatives of the Government successful; to not use them would prevent the efficient use of resources to achieve the goals laid out by the NEP.

COMMENTS ON HIGHER EDUCATION

1. The Tier System

1.1. Tiers not Types of Higher Education Institutions (HEI)

It is disconcerting to observe the choice of words used by the drafters while differentiating between the nature of HEIs envisaged by them through this policy. The drafters claim to have divided HEIs into three different “types” whereas what they have really done is create a hierarchy and tiers of HEIs. Other than evidence for the same being available throughout the policy, it is also telling that Dr. K. Kasturirangan referred to this differentiation as tiers in one of his recent press interviews. Within the policy this hierarchy can be observed in the following manner:

- The policy states that Type III institutions must thrive to become like Type II institutions and Type II institutions must thrive to become like Type I institutions, which clearly results in making one type look better than the other .
- The policy also states that Type III institutions should only offer undergraduate and diploma courses and Type I and Type II institutions should offer Masters and Ph.D programmes.
- Under the policy, Type 1 HEIs will be funded specifically to devise and offer capacity development programmes for faculty for the development of Online Distance Learning (ODL) courses and programmes.
- The policy also states that only Type I and Type II universities will be visited by the President of India and the Governors of the respective States.
- The policy also declares that “all new colleges started from 2020 onwards must only be autonomous colleges (Type 3).”

The above points are only a small set of indicators of the differentiation that has been created between the stipulated types of HEIs and clearly showcase the hierarchy that is sought to be created. The fear is that this will result in a clear perception that Type I HEIs are superior and more coveted than the others.

What is of concern to us is the gap between the aim and potential result of introducing the tier system for HEIs. Where the aim is to ensure uniformity in standards across HEIs in a manner that gives confidence to each student that he or she is being given the best quality education that is possible, the policy drafters have, in our opinion, made the gap more visible. We would strongly suggest that steps are taken to do away with this

hierarchy or at the very least remove the objectionable language that propagates such hierarchy.

NEP Reference: Chapter 10, Page 211.

1.2. Movement along the Tiers

The drafters have left it very vague whether they really want Type III HEIs to work towards becoming Type II and thereafter Type I HEIs. While all across the policy they have tried to indicate that they want all Type III institutions to move towards becoming Type I institutions and that there will be freedom of movement between the types for all HEIs, they have not given any tangible measures through which the same will be achieved and on the contrary have made many exclusionary statements and claims that indicate that Type I institutions will be lesser in number as compared to Type II and subsequently even lesser than Type III. In light of the impression of hierarchy, we suggest that drafters provide clarity to readers and implementers to prevent confusion.

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NEP Reference: Paragraph 10.3, Page 213.

2. Autonomy for Higher Education Systems

2.1. Autonomy to Grant Degrees

This suggestion by the drafters is another example of where they perhaps need to take note of the larger ecosystem prevalent in India today. The existence of a common assessment across colleges affiliated to a university allows for providing (a) students with an opportunity to compete through a level playing field and therefore catch up with their peers in spite of not getting into coveted colleges and (b) for employers to tangibly assess their performance through a common assessment. Central universities such as the University of Delhi are a prime example of the above.

It must be the objective of any country's educational policy to allow for multiple opportunities where students can catch up with their peers through hard work and equal opportunity. This proposal of the drafters will drastically impact the principle of equal opportunity and therefore must be reconsidered.

NEP Reference: Paragraph 10.13, Page 219.

2.2. Autonomy for deciding fees

The drafters have surprisingly stayed away from commenting on the setting of high fees

by HEIs and have rather concentrated on regulating the increase in fees by the HEIs. The drafters have further laid down suggestions for the grant of scholarships by all HEIs without yet again commenting on the original fee charged by the HEIs. It is feared that this approach will lead to exorbitantly high college fees which even after scholarship may be beyond the reach of many students. Additionally, while the drafters correctly make statements that require HEIs to give reasons and justifications for any increase in fees they have also given enough scope for HEIs to increase fees using the autonomy in setting curriculum and pedagogical practices that have been granted to it by the drafters. As mentioned earlier this will eventually lead to being the easiest way in which all educational institutions may justify an increase in fees.

NEP Reference: Paragraph 18.6.3, Page 334.

2.3 Confusion Over Admission Related Autonomy for HEIs

The aspect of admission into an undergraduate programme proposes a multitude of questions that all conclude to there being a massive gap between what the drafters have intended and what they have finally put on paper across the entire policy. At first, they have mentioned that HEIs will be allowed to determine their own respective admission criteria in furtherance to the autonomy granted to them. The policy goes on to state that admissions into all under graduate courses of Public HEIs must be through the NTA. The policy also retains the relevance of board exams as a criteria for undergraduate admissions. It also propagates that all HEIs may use the services of the NTA in order to establish entrance tests for the purpose of admission. This widespread confusion has only one certain outcome that students will now have to decipher multiple entrance criteria depending on the stream that they choose for themselves.

As mentioned earlier, this has the likely potential of leading to a drastic increase in coaching centres for more exclusive, and therefore costlier entrance coaching programmes. The possibility of HEIs using different entrance exams for admission will also lead to increased work loads for students and an obligation to decide their future at an extremely early age specially keeping in mind the hierarchy that has been created through the categorisation of HEIs envisaged by this policy.

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NEP Reference: Paragraph 4.9.6, Page 238.

3. Educational Reforms

3.1. Moving from Professional Colleges to Multi-Disciplinary Institutions

Perhaps a move away from global best practices, the drafters of this policy have deemed it appropriate to turn professional institutions into multi-disciplinary HEIs and thereby dilute the very essence of a professional course. Our country has worked extremely hard to empower professional colleges whether they be law schools, medical colleges,

engineering institutions or others and make them compete with global counterparts. We believe that the drafters need to take note of this effort, as well as the very globally established reasons for professional colleges to be standalone. This also seems to bring to question the objectives that we as a nation have earmarked as being critical for India's future. One of the main reasons why professional institutions dedicate infrastructure and campus area to just one field of study is because this ecosystem adds to the learning experience as well as the proficiency that is sort to be inculcated in our future professionals.

NEP Reference: Paragraph 10.1, Page 212.

3.2 Indian Institutes for Liberal Arts

Even the basic consideration of having an institution each in North-East-South-West-Central India would have been a more acceptable rationale than what is being proposed.

The draft goes about setting an extremely challenging target on the Government to achieve, i.e. the establishment of 5 Liberal Arts Ivy-League level institutions within the next 5 years. One of the questions that arises is, why can the Government not focus on improving the already existing educational institutions and make them 'Ivy-League level' instead of creating new ones altogether. This incomprehensible target is coupled with less relevant criteria aimed at the State Governments which specifies that the institutes will be

constructed only in those states that are willing to provide "a large tract of land, say 2000 acres, at an 'attractive' location and provide up to 50% of the funding requirements of the universities." The entire criteria of selection for these institutions is problematic and brings to the fore considerations that have no bearing on academic and socio-economic reasons that should have been the primary focus rather than the fiscal considerations that have been prioritised. The NEP makes it easy for the Central Government to ignore relevant factors like the student density in an area, nearby industries for employment, which area needs development, equitable regional representation etc. If our country's objective is to create an 'educated India' even the basic consideration of having an institution each in North-East-South-West-Central India would have been a more acceptable rationale than what is being proposed.

NEP Reference: Paragraph 11.1.4, Page 231.

3.3. Redefining Liberal Education

The drafters have undertaken the extremely praiseworthy step of promoting liberal education through 15 dedicated pages in the policy along with many other mentions interspersed throughout the policy. However, there are more than a few areas of caution that need to be taken care of before passing judgment on the true impact that this move may have on the students. At first it is of concern that the drafters have relied heavily on examples from Indian history while explaining what liberal education in India should look like. The key concern here is that while India may arguably have been a pioneer in liberal

education thousands of years ago, the world has proceeded at a rapid pace where mere knowledge of global thought processes and facts cannot be deemed to be adequate enough to be termed as liberal education. It is also of concern that due to the majority of examples and reasons and references in the entire section on liberal education being Indian, there is a high probability of those tasked with implementing this policy might miss the very essence of the policy and continue ahead with tradition. It is also of concern that the most important facets of liberal education i.e. debate and dissent have not found adequate mention in the policy in spite of being indispensable for the imparting of liberal education.

NEP Reference: Chapter 11, Page 223 to 238.

3.4 Absence of renewal courses and assessments for professionals

Given the important role the professionals such as doctors and lawyers play in our society as well as the rapid pace at which both law and medicine are evolving, it is surprising that the National Educational Policy has not contemplated the application of periodic assessments for the license renewal of these professionals. Global best practices acknowledge the vital role played by professionals and require them to be up-to-date with all the latest developments in their profession in order to ensure that the public receives the best possible and correct counsel at all points. We would strongly urge the drafters to consider this point for the betterment of the citizens of our country.

3.5 Online Distance Learning Courses and MOOCs

The policy recognises the usefulness of online distance learning courses to the extent that we are concerned whether the policy drafters are proposing admissions into such online courses should count towards determining higher education enrollment in the country. In our opinion, while the Online Distance Learning Courses and MOOCs are extremely relevant and useful, they might not be able to act as a perfect replacement for offline driven courses and assessments. Additionally, we strongly recommend that all assessments for online distance learning courses must be held in an offline testing environment to remove cheating and other malpractices that will continue to be common for any online assessment that has been prescribed a definitive value.

NEP Reference: Paragraph 12.4.10, Page 252.

3.6 Student Exchange programmes

The policy drafters have correctly identified the strengthening of international student exchange programmes as a tool for improving the quality of education in the country, increasing visibility of Indian arts, traditions and values and also increasing the exposure available to Indian students. We would have hoped that the drafters would have made a mention of

the policy makers should take advantage of a golden opportunity to promote national unity amongst all Indians.

inter-state student exchange programmes as well. In today's India it is a critical need for individuals to understand our country and its numerous regions much better in order to increase both understanding and acceptability. In our opinion, the policy makers should take advantage of a golden opportunity to promote national unity amongst all Indians. India's recognition as a sub-continent and the diversity we are proud of, would provide a tremendous learning opportunity for students if utilised appropriately. We would greatly appreciate its relevance being recognised.

NEP Reference: Paragraph 12.4.6, Page 251.

3.7 The National Research Fund (NRF)

The NRF aims to provide a shot in the arm for research across HEIs in the country through a fund specifically established for promoting research comprising both public and private funds. All efforts must be made to ensure that the research being funded by private parties is not diverted or influenced towards private agendas over and above the areas identified to be relevant for the nation.

NEP Reference: Paragraph 14.1.1, Page 270.

4. Teacher Based Policies

4.1 Treatment of Ad-hoc teachers

The policy drafters acknowledge the trend of colleges and universities hiring ad hoc and contractual teachers instead of permanent staff in spite of having permanent openings perhaps because the cost incurred on ad hoc and contractual staff is lesser than that of permanent staff. They go on to declare that this approach must be stopped immediately. The trouble with this construct is two fold: (1) by referring to financial considerations as the cause for this phenomenon whilst also maintaining the idea that education needs to be a not-for-profit initiative, the drafters seem to be either acknowledging the discreet for-profit motives for educational institutions or ignoring the financial realities behind the appointment of ad-hoc and contractual staff, (2) the policy also raises alarm for these ad-hoc teachers as there is no clear indication as to how these ad-hoc and contractual teachers will be mainstreamed into permanent positions, if at all. It may well be that the intent of the drafters is to convert all ad-hoc and contractual teachers into permanent staff. However given the historical debates and discussions around this topic, it is not conclusive and requires more clear action in this policy.

NEP Reference: Paragraph 13.1.2, Page 256.

4.2 Teacher Education for Professional Courses

Teacher Education for Professional Courses has been proposed to be a highly complicated affair by virtue of requiring professionals to undergo a special course in order to be eligible for teaching. It is humbly submitted that one of the core concerns

that professional education currently faces is the lack of practising professionals that take the time to teach in colleges and universities, therefore depriving students of the opportunity to learn from practical experiences. While on a standalone basis this attempt by drafters is appreciated, however, the inadequacy of their suggestions in this regard may result in foreseeable negative consequences. A possible middle ground could have been the introduction of teaching electives as a part of the postgraduate professional courses.

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NEP Reference: Paragraph 15.2.1, Page 286.

5. Classification and Ranking

5.1 Accreditation through Peer HEIs

The policy drafters have surprisingly suggested that HEIs may apply to become accreditation institutions whereby they can provide accreditation services to other peer HEIs. Until and unless their accreditation is purely objective, we are deeply concerned by the potential of peer institutions using their subjectivity while accrediting their counterparts.

NEP Reference: Paragraph 18.2.2, Page 329.

5.2 HEI rankings

On page 329 of the policy, drafters make a highly disturbing statement where they state that “ratings and rankings of HEI shall be left to public opinion and market forces”. The consequence of this statement has a far reaching impact more so in light of the hierarchy that has been created, the autonomy of granting degrees as well as the freedom granted for setting fees. This line also has the potential of deeply contradicting the objective of the policy where it states on page 401, “This Policy is unambiguous and explicit that education must be a not-for-profit activity and enterprise in society”. The moment rating and rankings of HEIs are left to market forces, it will invariably lead to the hiking of fees and subsequently the widening of the gap between institutions of differing quality. The above mentioned line on page 329 is extremely troubling given the fact that in our opinion it should be non-negotiable for our government to aim at ensuring high quality

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education for all our citizens and not allow market forces, that by their very definition are open to manipulation, determine the quality of education available to different parts and sections of India. As we highlight this one example, we also note that there are many such places where the objective, intent and language of the drafters is contradicting and largely ambiguous.

NEP Reference: Paragraph 18.2.4 and Paragraph A1.1, Page 401.

6. On Ground Issues

6.1 Zero Acknowledgment of Anti Ragging Laws

One of the biggest stains on the Indian education system has been the long standing ignorance of ragging across educational institutions which in the last decade has faced tremendous uproar but remains a menace even in 2019. As with other realities of the Indian education system, this is yet another example where the drafters of this policy have failed to address on the ground issues while focusing on visionary and often unachievable and regressive objectives. Issues such as these need special mention so that they are not brushed under the carpet, especially where it is well documented that ragging leads to permanent impact on the mental health of the students leading to dire consequences including suicide. Given that education in our country is a life or death variable, it is highly disturbing that the drafters have chosen to ignore this reality.



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