I. EXTENSION OF THE RTE TILL 18 YEARS OF AGE

One of the biggest improvements in the NEP was its commitment to its downward and upward extension.

- However, while the earlier version had this as an explicit commitment, the current draft only states that this would be considered. This is a significant dilution.
- We welcome dNEP’s focus on criticality of early childhood period. However, regret that the document continues to be inconsistent in addressing 3 to 8 as the Foundational Stage and in failing to address the existing tension points in delivering ECE. Modalities of enhancing the quality of all AWCs to become sites for delivering quality early childhood education, particularly enhancing ICDS workers’ skills and ensuring the availability of the second AWW worker, particularly need to be addressed.

II. EQUITY IN EDUCATION

Education is one of the most important means of promoting equity in society. Education cannot be considered of good quality unless it is equitable.

- Issues of exclusion need to be mainstreamed in the policy, not located in a single chapter.
- The chapter on equity identifies some Unrepresented Groups (URGs). This places the focus on ensuring representation/participation in education and ensures that there is inadequate concern to addressing the everyday experience of students that are already enrolled. Equality in the learning process, equality in educational outcomes and equality in external results should also be reiterated. More focus is needed to ensure that not only do students from marginalized communities have access to the best possible quality to education to overcome historic marginalization, but to ensure that education itself becomes transformative.
- When dealing with the issues of URGs, the focus is on addressing low representation/enrolment among students based on gender identity, disability, some socio-cultural identities and urban poor. However,
- SC/ST children and religious minorities have constitutional protections and these risk being diluted when clubbed under a singular frame of URGs.
- Including 50% of India (girls) as an URG makes the category meaningless
- Disability should receive more emphasis and be drafted in line with the provisions of the PWD Act 2016.
- Categories need to be in line with the National Policy for children. Missing categories include children in conflict situations, children in conflict with law and in need of care and support, etc
- Does not address inter-state inequalities, only inequalities within the state. It is critical to ensure that concrete steps are taken to ensure educationally lagging states catch up with those with higher average performance.
- Does not address income-based inequalities- the gaps in quality between rich and poor students. First policy in decades to not mention, let alone give a roadmap towards realizing, the common school system. The Common School System was proposed as the mechanism to address equity in education which has now been totally ignored.
• Special Education Zones: Not clear how this proposition is different from existing provisions like Educational Backward Blocks and other similar provisions. Zoning only risks furthering ghettoization and segregation in education.
• The policy does not give adequate attention to the continued existence of out of school children. A stronger focus on ensuring availability of accelerated learning through mechanisms of special training in line with the provisions of the RTE Act is needed.

### III. QUALITY

Good quality of learning is not possible unless a good learning environment is ensured and socio-economic barriers are addressed. The policy is flawed in its solution by analyzing the problem of quality. It is a less a problem of learning, but more of the schooling system

• Only 12.7% schools in India comply with the RTE norms. The policy should lay down a roadmap for meeting existing norms and offer an aspiration of ensuring each child has a real chance of obtaining an education of the highest possible standard.
• There are clear risks in terms of diluting quality through the informalization of the education sector being proposed- eg. bringing back provisions like homeschooling and multiple forms of provision
• Proposing wasting funds on standardized testing. Why do census-based SAS without pedagogic purpose. Invest in improving quality instead.

### IV. RISKING GROWING PRIVATIZATION OF EDUCATION

School education has already been defined as a not-for-profit sector in India. We welcome the policy’s reiteration of this principle.

• Given the failure of private schools to adhere to existing regulatory frameworks, it is not clear why “light” regulation and self-regulation by the same sector would succeed. Regulatory frameworks need to be in line with existing human rights frameworks and be backed by robust enforcement mechanisms.
• The policy speaks about promoting philanthropic schools. Since the term is undefined and all schools are not-for profit by law, this really risks promoting all private schools.
• Mechanisms for regulating tuition centres, ICT contracts and PPPs in education should also be laid down.

### V. GOVERNANCE

• The policy endorses closure of small schools’ which risks depriving India’s poor students in rural areas of their right to education and promoting low fees private schools, some of which are backed by for-profit transnational and multinational business companies. This recommendation needs to be removed from the policy.
• The policy should strengthen each school, not dilute autonomy of individual schools through the creation of complexes.
• The proposed breakup in terms of stages- 5+3+3+4- is a radical departure from the existing architecture of the education sector. The streamlining of the new governance system in education laid down by the RTE Act has taken a decade and is still not fully rolled out. The level of changes required to accommodate this new shift does not appear to have been thought through adequately. The resulting turbulence will only delay the process of universalization of quality education for all children until the age of 18 years.
• The policy does not appear to reflect some of the lessons of non-implementation of past policies. More focus is needed on strengthening the system (at district and block levels) to ensure adequate administrative capacities, strengthen monitoring and grievance redress mechanisms and provide for a system of gradually transitioning into new way of working that would be necessary for the roll out of this policy. These dimensions are missing or weak creating challenges for the policy’s implementation.
• While the commitment to investing 20% of the budget on education is welcome, it is not clear whether the specific needs of educationally lagging states (many of them already spend close to 20% of their budget on education) and the new ambitions in the policy (especially in tertiary education) have been adequately dealt with. The demand for 6% GDP on education is a long standing commitment of successive governments from the 1960s. The timeline for increasing the budget should likewise be 5 and not 10 years.

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