RTE FORUM’S COMMENTS ON THE
DRAFT NATIONAL EDUCATION POLICY 2019

Preamble

We agree that there is need for a new National Education Policy. The last National Education Policy was adopted in 1986/1992. Since then, changes of far-reaching significance have taken place both nationally and internationally. The most important among these changes are advances made in those areas of technology, particularly information and communication technologies, which have a bearing on the kind of education that is most relevant and on the modality of providing such education.

Having conceded the importance of adopting a new education policy, we would like to caution that it should not be at the cost of or divert attention from the recent advances made in the realm of school education policy. The most important among them is the adoption of the RTE Act. This is the highest stage reached in the evolution of education policy in India. Elementary education is now a fundamental right and a legislation has been enacted by the Indian Parliament to give effect to it. The RTE Act confers a legal right, a policy document does not confer such rights.

In this context, it is also important to remember that the RTE Act reflects a holistic approach, obliging the State to act on all the relevant variables simultaneously in order to reach the objective of universalising quality school education within five years. We can of course discuss how we should go about setting a new time limit, as the one in the RTE Act has not been adhered to. However, a revised time period cannot be too much longer than that set in the RTE Act. In any case, we cannot accept a dilution of the RTE timeframe through the route of a new policy framework. By the same logic, the time limit of the SDG goals, which is 2030, is not relevant for India and hence not acceptable to us.

In the Preamble as well as in the main body of the report, it is stated that in school education, India has pursued equity and access at the cost of quality. This assertion is not based on facts. The Indian school education system is one of the most inequitable in the world. Moreover, a lot leaves to be desired in providing access. The enrolment ratio is not a complete measurement of access. In this context, we have to take into account attendance and dropout rates also. Besides, access and equity on the one hand and quality on the other, are not unrelated. Empirical evidence shows that quality cannot be pursued at the cost of equity. In other words, an inequitable system of education cannot provide quality education. No doubt, we have achieved greater success in moving towards universal access than in ensuring quality. But this has been due to lopsided implementation of the RTE provisions.
We strongly endorse the suggestion in the document that ECCE be included as an integral part of the RTE Act. More specifically, we very much welcome the decision of the Committee which drafted the National Education Policy that “free and compulsory quality pre-primary education for all 3 to 6 year olds will be included as an integral part of the RTE Act”. (Page 53). The logic behind this laudable recommendation is impeccable. First, the education at this stage is extremely important for the future development of the child’s mind and hence its capacity to learn. Second, return on investment in education at this stage is higher than that at other stages. And lastly, when elementary school level children have been granted fundamental right to education, there is no logic to deprive the children in the age group 3 to 6 years, of this right.

The work done in the country for developing curriculum and pedagogy for education for the children in this age group is grossly inadequate. We therefore endorse the Committee’s recommendation to mandate the NCERT to develop a curriculum and pedagogical framework for ECCE. The Government should carry out on a priority basis a programme for training teachers to enable them to apply the curriculum and pedagogy suited to the requirements of the children in this age group, while integrating three years of pre-primary education with primary education.

We believe that all government schools which teach primary classes should have a preschool. Thus, out of the four modes suggested in the report for delivering education within the framework to be developed by the NCERT, we are in favour of mode (C) i.e. co-locating preschools with primary schools. We are not in favour of the other modes. We believe that it will be extremely difficult to co-locate Anganwadis with primary schools given the fact that in the Anganwadis, taking care of health and nutrition needs of the children is as important as imparting education. A school premise does not provide the environment for taking care of the former. Besides, the culture developed by the Anganwadis and Anganwadi workers are quite alien to that which prevails in a primary school. Building stand-alone pre-primary schools will also not be desirable because of the additional costs involved and the desirability of bringing the children from the very early age into the school mainstream. Building stand-alone pre-primary schools will also encourage the intrusion of the private sector on a much larger scale than what prevails today, into pre-primary education.

The non-educational requirements of the children in the age group 0 to 3 years should continue to be taken care of in the Anganwadis. For this purpose, the Anganwadis should be totally
revamped and universalised. The provision of nutrition and health services to the children in this age group in the Anganwadis should be made a legal right.

It is important to address the problem of out-of-school children in the age group 3 to 6 years. These problems in several ways are likely to be different from those of out-of-school children at the elementary level.

We think that the deadline given for the finalisation of the plan to integrate early childhood education with school education, i.e. by the end of 2019, is unrealistic.

The document states the goal to provide free and compulsory quality school education to children from the age 3 to 18 years, by 2030. This is too long a period to universalise school education in India. The RTE Act has provided that universalization of elementary school education should be completed in five years. This period is already over. If we have to set a new deadline, it should not be too much longer than five years. The time limit of five years is both desirable and feasible.
Chapter 2

Foundational Literacy and Numeracy

We see merit in combining three years of pre-primary education with the first two years of primary education. This is because the pedagogical and other educational requirements are common to the children in the age group of 3 to 8 years.

However, we do not see much merit in converting, for this purpose only, the present 10+2 system into a 5+3+3+4 system. As the Committee has pointed out, the 10+2 system has functioned and served the nation very well. This is in spite of the fact that it has not been implemented in the spirit in which it was recommended. For example, higher secondary classes i.e. XI and XII are still in several parts of India, a part of the college education. In several other parts, it is a part of school education extending from Class 1 to XII. In most parts of India, XI and XII have not either been made stand-alone schools or a part of secondary (i.e. IX and X) school, as was the intention of the original recommendation. If a new system is recommended, it will take years to put it on the ground in view of the complexity of the system which prevails currently. In the process, the dislocation and disruption that will result would take years to be stabilised. Another reason of our opposition to the model recommended in the document is our apprehension that in case the RTE Act is not extended to cover three years of pre-primary and two years of secondary education, we might end up replacing the eight years of free and compulsory schooling provided in the Act, by the five years of the Foundational Stage recommended in the report.

The document tries to bring out in as stark a form as possible the so-called learning crisis that prevails in the school education system in India. We do not agree that learning is the only or even the main problem of school education. We also do not agree that this problem can be solved in isolation. It is not the learning crisis that besets the Indian school education system but the crisis of the school system itself. This crisis can be resolved through a holistic approach as provided in the RTE Act consisting of the building of the necessary infrastructure, recruitment of required number of teachers, training of the teachers and improvements in curriculum and pedagogy; and not just by bringing about improvements in learning achievements measured on the basis of a very narrow definition of the purpose of education.

We are strongly opposed to the recommendation in the document that teaching requirements of schools should be met by peer tutoring, educated members of the community and volunteers. This goes against one of the basic provisions of the RTE Act i.e. the reliance on fully paid qualified and well trained teachers for providing free and compulsory quality education.
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We also think that this will reverse the recent progress made in eliminating the informalisation of school education, which was introduced for the first time in the 1986 National Education Policy and which assumed ominous proportions after the onset of the current process of liberalisation and globalisation, particularly under the influence of the international agencies like the World Bank and UNESCO. Jean Dreze and Amartya Sen, have characterised this informalisation of education as neither effective nor equitable nor sustainable. The ominous forms of informalisation were increasing reliance on para-teachers and temporary camps and centres rather than schools for imparting literacy. The RTE Act has provided for the elimination of these forms of informalisation and complete reliance on schools and teachers. The Committee’s suggestions regarding peer tutoring and the involvement of members from the community and volunteers in teaching is a retrograde step in this context. Moreover, the scale on which the improvement in teaching/tutoring is required to be brought about cannot be achieved by these informal arrangements and can be provided only by the community of teachers. There are several other negative implications of this suggestion including how to go about organising this informal sources of assistance, the damage that it will do to the position of the teachers in the system and to the learning process of the students who are selected for peer tutoring etc.,

We are also against the two main recommendations of the Committee for removing the learning deficiency of children in schools. These are the NTP (National Tutors Programme) and RIAP (Remedial Instructional Aides Programme). These suggestions go against the RTE Act. RTE Act has no provision for special tutoring for students who are deficient in learning. This is inherently inequitable. The RTE Act has very rightly suggested the provision of special training which is open to all those who want to attend it. This training is supposed to be given in the school and run by teachers and not by fellow students, community members or other volunteers, as suggested by the Committee.
Chapter 3
Reintegrating drop outs by ensuring universal access to education

This Chapter brings out the dimension of the problem of drop outs and its causes and suggests remedies. It states that “an estimated 6.2 crore children of school age (6 to 18 years) were out of school in 2015 (page 65). The causes mentioned by the Committee are well known. However, it does not highlight the 71st Round of NSS finding that economic compulsions are the most important cause of drop outs. The measures suggested for eliminating drop outs are highly selective. The RTE Act has a more comprehensive approach towards solving this problem i.e. among others, to build all the schools that are needed, to recruit all the teachers required, train all the untrained teachers, and strictly abide by the infrastructure norms. These do not figure prominently in the draft Policy. Instead, such measures as providing transport, building hostels, tracking the children dropping out etc. are given undue emphasis. As a matter of fact, if the availability of schools at the prescribed distance from the habitation of the child is guaranteed, there is no need to make special arrangements for transport or to build hostels. Countries which have universalised school education, did not follow these practices.

National Tutors Programme (NTP) and Remedial Instructional Aides Programme (RIAP) are not the solution to the problem of bringing to school the drop out or never enrolled children. We require full time and qualified teachers who can support them to continue their education rather than persons working on an informal and part time basis. Reliance on NTP and RIAP also contradicts the RTE provision that all children will be taught by qualified and trained teachers.

There can be no objection to tracking. But tracking should be left to the parents and the teachers and not to volunteers. There is no suggestion in the Policy as to how to select, organise, train and deploy the volunteers and whether it can at all be done on a scale required to deal with the magnitude of the current problem of drop outs. Similarly, there is no need to concentrate in under-served areas or those areas where the problem of drop outs prevails in an intense form so long as all the schools are there at the appropriate distance. To implement this norm of the RTE Act, the most important provision of the Act on which the appropriate authorities seldom took any action was the mapping of the schools in order to decide on the number of schools required to be built and their location.

The document does not adequately deal with the problem of out-of-school children and those who have dropped out of school as well as those who have never been enrolled. The children falling in this category come from different backgrounds and hence have different problems. If all the out-
of-school children are to be brought to schools, then there is a need of paying special attention to children of migrant workers, street children and other categories of children abandoned by their parents.

We welcome the suggestion in the last paragraph of this Chapter that “the availability of free and compulsory quality secondary education ….. (Grades 9 and 12) will be included as an integral part of the RTE Act”. However, we think that the suggestion that such education will be provided on a universal basis at the secondary level by 2030 is to set a too distant time target. The world is moving so fast that if we want to keep pace with countries which are at our level of development, we should universalise secondary education within five years and not ten years, as suggested in this document.

The most objectionable part of this Chapter is the suggestion that the RTE norms for building schools “will be made substantially less restrictive”. RTE norms are now the legal rights of the children and we have to be very careful before suggesting any relaxation in these norms. In any case, we should not perpetuate the myth that in these norms there is great emphasis on inputs and less on outputs. If at all, this disparity has developed in the process of the implementation of the RTE norms and is not inherent in them. Even more objectionable is the suggestion in the report that different agents – both public and private –, should be enabled to construct different kinds of schools so that there is a healthy competition among them and the parents can exercise choice. The vast majority of the poor and the marginalised parents cannot afford to exercise this choice. This choice is available only to the children of the elite class.
We wholeheartedly endorse some of the very positive objectives with regard to curriculum and pedagogy, spelt out in this chapter. Our reference here is to the general objective stated at the very beginning of the chapter i.e. “curriculum and pedagogy are transformed by 2022 in order to minimise rote learning and instead encourage holistic development and twenty-first century skills such as critical thinking, creativity, scientific temper, communication, collaboration, multi-lingualism, problem solving, ethics, social responsibility and digital literacy”. (Page 73)

There is also a separate paragraph on “scientific temper” under which it is stated that evidence based reasoning and scientific method will be incorporated throughout the school curriculum in order to encourage rational, analytical, logical and quantitative thinking in all aspects of the curriculum. There is also a very welcome promise that the constitutional goals will inform the curriculum as well as the overall culture and environment of every school; the document very usefully summarises some of the constitutional values which are: democratic outlook and commitment to liberty and freedom; quality, justice, and fairness; embracing diversity, plurality and inclusion; humaneness and fraternal spirit; social responsibility and the spirit of service, ethics of integrity and honesty; scientific temper and commitment to rational and public dialogue; peace, social action through constitutional means, unity and integrity of the nation, and a true rootedness pride in India with a forward–looking spirit to continuously improve as a nation”. (Page 96-97)

This Chapter is full of exhortations which will be extremely difficult to be translated into concrete action and if an attempt is made to do so, it will require huge amounts of additional resources – both manpower and financial and will take a very long time to implement. Some of such suggestions are, training of a large number of teachers in languages, translations of important books and treaties into all major languages of India etc. If this would have been an easy task, it should have been done long time ago.

On the language policy, particularly the use of the mother tongue as a medium of instruction, the formulation of this document is not very different from that of the RTE Act. The RTE Act provided for instruction through the medium of mother tongue “as far as possible”. This document qualifies it by the term “when possible”. As with the RTE Act, the provision in this document also gives a carte blanche to schools, particularly the private schools to use English as a medium of instruction.
We believe that for national unity and for the preservation of social and cultural diversity, the implementation of the three language formula is long overdue. This should definitely be initiated as part of the effort for revamping the school education system in the country. It should be recognised that the implementation of this formula will be possible only if a large number of teachers are trained to teach in the mother tongues of the children and to teach in languages other than the language of the region. This will also require translation work on a massive scale. If the state is really serious about implementing this formula, it will have to provide the resources for the purposes mentioned above.

The suggestion on bilingual teaching is of dubious value. In such an effort, the students are unlikely to have the incentive to learn thoroughly either of the two languages in which the teaching takes place. The same will happen about the availability of teachers to teach these languages.

The document, on the one hand, promises to “reduce curriculum load in each subject to the essential core content” but, on the other hand, suggests the introduction of a large number of compulsory courses. These include those on the “languages of India”, “classical languages of India”, “critical and moral reasoning”, “critical issues facing the community, nation and the world”, and “vocational training.

Some of the suggestions relating to curriculum are laudable. These include giving to the students “an increased flexibility and choice of subjects.”

However, in spite of these general provisions regarding flexibility, the document makes the strict stipulation: “students must receive exposure and orientation to vocations in more than one sector during Grades 6 – 8, with preliminary hands on training provided at the school premises, so that they can make informed choices in Grades IX – XII”. (Page 366)

On the question of work related education, an important omission in the document is reference to Mahatma Gandhi’s suggestion of education through work. This was the most important component of Gandhiji’s vision of education which was side tracked in the discussion of Nai Talim during the lifetime of Mahatma Gandhi. The Commission should have at least recommended that for about 5 years, during the period of Foundational Literacy and Numeracy, an experiment should be carried out on imparting education through work as enunciated by Mahatma Gandhi and that a syllabus and pedagogy for this purpose should be developed. Such an experiment would be very timely and worthwhile for inculcating dignity of labour, developing all the faculties of the children and in the context of the salience that environmental issues have acquired mainly because of modern technology.
It is suggested in this chapter that “preparation of additional textbook material would be funded by public private partnership or crowd sourcing”. At the same time, it is stated at two places in this part of the document that textbook prepared in this PPP mode would be “available to teachers and students at minimal cost i.e. at the cost of printing”. This is against the provision of the RTE Act because the Act provides that textbook will be made available to students free of cost. So, the question of minimum cost should not figure in the discussion on this subject. Secondly, it can be assumed that in most instances where the private sector is involved in preparing and bringing out the textbooks, it would be extremely difficult to keep the prices low. It has not so far happened in India and there is no reason to believe that it will happen in future.

It is stated in the document that assessment will be used as a means of evaluating progress in school education at all levels of such education. At the same time, the document provides for students taking exams in Grades 3, 5, and 8 in addition to the Board exams in X and XII (Page 107-108). These exams are prohibited at the elementary stage under the RTE Act. Moreover, if all exams prescribed in the document are to be held, it will add to the financial burden on the nation to provide free and compulsory quality school education.

Finally, there are major errors in the document where Urdu is bracketed with less developed languages used in local areas, like Awadhi, Maithili and Braj (Page 85); and Persian is bracketed with ancient languages like Pali and Prakrit (Page 86). Urdu is one of most developed, refined and rich languages of India. It should also be remembered that Persian (Farsi correctly) is very much a modern language with highly rich modern literature. It is the national language of Iran and, in a somewhat modified form, of Afghanistan. Farsi is also related intimately to Arabic from which it derives 60 to 90 per cent of its vocabulary, depending upon the subject, and much of its grammar.
There are several suggestions in this chapter which we very much welcome and which we strongly endorse. These include:

(a) Proportionately larger number of teachers should come from the local area.
(b) In rural areas, teachers will be provided with accommodation within the school premises.
(c) Efforts should be made to recruit teachers who know the local language.
(d) Premature and frequent transfer of teachers should be halted.
(e) Teachers should not be burdened with non-teaching work except election and Government survey work which are mandated by the Supreme Court.
(f) Teacher education colleges run by the private sector which are “functioning as commercial shops” will be shut down.
(g) By 2030, the minimum degree qualification for teaching will be a 4-year liberal integrated B.A. degree.
(h) We also agree that in the interim, a two-year B. Ed programme should be permitted where teacher candidates are otherwise qualified.
(i) By 2030, all B.Ed programmes should be moved to multi-disciplinary universities and colleges.
(j) All para-teachers should be dispensed with by the year 2022.

We also endorse the general objective set out in the beginning of the chapter that the objective will be to ensure that “all students at all levels of school education are taught by compassionate, motivated, highly qualified, professionally trained, and well equipped teachers”.

Having endorsed the above goals and suggestions, we are of the view that without bringing about other necessary changes in the school and higher education system, it will be very difficult to implement these goals and objectives.

We also feel that there are contradictions between these objectives and the recommendations made in other parts of this chapter.

It is also important to remind ourselves that most of these recommendations are covered by the RTE norms or its other provisions. What is really required is putting in place institutions and personnel to implement them and make the necessary resources available for this purpose.

Regarding contradictions, the Committee recommends the recruitment of “highly qualified and professionally trained” teachers. On the other hand, the Committee has recommended the
deployment of student teachers, educated members of the community as teachers and volunteer teachers. The recommendation also goes against the Committee’s other recommendation that by 2022, there will be no para-teachers in the school education system. The Committee puts a great deal of emphasis on setting up infrastructure to create a proper environment for teaching. It says “…. The everyday environment for teachers and students must be safe comfortable and inviting.” At the same time, the Committee in several places in the document has suggested the relaxation of the infrastructure norms in the RTE Act. On page 118, the Committee goes on to prescribe individual infrastructure items. Some of these even go beyond those provided in the RTE Act. And yet it thinks that the requirements for infrastructure provided in the RTE Act are too rigid.

We welcome the statement that the system of para-teachers, teachers on contract and teachers appointed at lower salary will be stopped. But the deadline given for it i.e. the year 2022 is too early. In implementing the suggestion, it should be ensured that teachers in this category have adequate time to look for new opportunities and adjust.

We do not agree that all the teachers should be appointed at the local level. We suggest that for the recruitment of teachers, particularly at the secondary level, a Teachers Service Commission should be established. We further suggest that there should be a scientific and transparent standard for fixing the salary and the promotion of teachers. For this purpose, a National Pay Commission to be set up. They should be established at the national level and applicable to school teachers all over the country.

We are against the association of social workers with the School Management Committees. This carries the danger of bringing party politics in schools.

Whereas we welcome that the teacher should not be engaged in non-teaching duties, we would suggest that this principle be extended to apply to other personnel employed in school who are not employed in teaching.

The document proposes that all private colleges providing teachers’ training, which constitute 92% of the total number of teachers trained in the country, should be closed. Apart from the practicability of implementing this measure, its implementation will call for setting up a large number of training colleges and strengthening the existing training colleges in the public sector. Without ensuring this there will be a discontinuity in teaching which the nation can ill afford.

The Committee suggests a networking of institutions at the cluster, block and district levels but has no particular suggestions on how to revive them, enhance their capacity, ensure their quality and sustainability. It is only stated that a plan for it will be prepared. Reviving these institutions and making them vibrant and dynamic is an urgent task which cannot wait for the preparation of a plan.
On page 128, the Committee states (see the portion in bold letters), “the practice of assigning teachers to individual schools based on overall student-teacher ratios will be replaced by much more carefully assigned system based on the educational needs of children”. It is disingenuous on the part of the Committee to have suggested the replacement of the criteria of “student-teacher ratio”. The fact is that in any efficient system, the criterion of “student-teacher ratio” and “educational needs” are combined. This is what has been done in the RTE Act also. All good schools do need-based deployment keeping in mind the student-teacher ratio. Incidentally, the criteria of student-teacher ratio is itself need-based.
In this chapter, the Committee lays down the objective of equalising participation and learning outcomes by the year 2030. It is a very ambitious objective the realisation of which is related not only to reforms in the school education system but long pending reforms at economic, social and cultural levels. Viewed in this wider perspective, the objective set forth by the Committee is unrealistic. In addition, the report should have underlined that equity is one of the very important objectives of education, that there can be no quality education unless it is equitable and that education is one of the most important means of promoting equity in society.

We have reservations against the approach adopted in this entire chapter. What has been done in the document is to identify what is called “under-represented groups (URGs)” classify these groups into several categories like SCs, STs, children with special needs (CWSN), minorities, women, transgender etc. and suggest specific measures for each of these groups. The suggestions have a lot in common e.g. creation of a special fund, instituting scholarships, fostering representation and participation etc. Some of the recommendations made in the earlier part of this chapter were tried in India as part of anti-poverty programmes. These included concentration on poor regions, poor districts, activities in which poor are mostly engaged etc. None of these measures have had much of an impact on the reduction of poverty. If these measures have not resulted in making much of a difference in the mitigation of poverty which is basically of a material nature, how much more difficult it will be for similar measures to reduce educational inequality which is basically social and cultural in character. The problem is basically rooted in social, cultural and economic factors. Unless these deep rooted causes are removed, it is unlikely that implementation of these measures would bring about changes on a significant scale in the inequality prevailing in school education.

This chapter talks about equipping schools with libraries, laboratories etc. This ignores that what is wanting in the school system for the unrepresented groups (URGs) is also wanting for all others who are in schools. On the education of the children with special needs, the Committee recommends home education as one of the alternatives. This is undesirable because it may come in the way of parents and schools making special effort to keep the children at school. Therefore, it should be clarified that home education should be resorted to as an exception for health reasons when the child is unable to go to school. Moreover, the People with Disability Act (2016) has a number of very far-reaching and progressive provisions for facilitating education and meeting the other needs for children with special needs. Similarly, the UN Convention on the Rights of Persons with
Disabilities has several very significant provisions. The Committee should have studied the National Act and UN Convention in framing its recommendations. Therefore, the best solution is to provide all these inputs as legal entitlements to all students as has been done in the RTE Act and complete the process within a relatively short timeframe, say five years as it was in the RTE. To assume that these deficiencies will continue in the system for years to come and therefore, try to selectively remove them for the benefit of the URGs, is rather cynical.

It is not our intention to go into details. However, we consider it important to point out that the idea of creating special education zones is highly undesirable. We feel that such zoning of children will lead to their further exclusion.

In general, the most sensible way to proceed with in dealing with the problem of equity is to integrate equity concerns at all levels, in recruiting teachers, developing curriculum, and syllabus based thereon, its delivery, governance etc.

Even after the RTE Act is extended to pre-primary and secondary education, as suggested in the Committee’s report, and the revised Act implemented within a new time framework, the school education in India is likely to remain a den of discrimination and a source of perpetuating and accelerating economic and social inequality in the country. This is principally because the continuance even under the revised RTE regime, of the existing multi-layered school education system in India, which is inherently discriminatory. The only way to remove this built in discrimination in the school education system is to introduce a Common School System (CSS) in the country which ensures a uniform quality of education to all the children in the country. The CSS was first recommended by the Kothari Commission (1964-66) and reaffirmed in the National Education Policies in 1968 and 1986, as amended in 1992. However, there is no mention of Common School System in the draft National Education Policy. We regard this as a glaring omission. We would very much like the document to mention the objective of India moving towards a Common School System and to recommend that the action for introducing such a system should be taken at the earliest.
Chapter 7: Efficient Resourcing and Effective Governance through School Complexes

The document suggests governance through school Complexes to facilitate the sharing of resources among schools. We are not in favour of this proposal for the following reasons:

(a) In our view, every school should be self-contained with the provision of all the infrastructural facilities and services laid down in the RTE Act. We concede that in spite of that, it may be necessary to share some resources. But we do not believe that for this purpose, it is necessary to engage in a nation-wide exercise of grouping schools into Complexes. This limited sharing can be done through the more effective and systematic use of the Cluster Resource Centres (CRCs) backed, where necessary, by Block Resource Centres (BRCs). For this purpose, additional resources should be provided for running the CRCs and BRCs in an effective manner.

(b) A large part of the functions assigned to the Complex are of an administrative nature. The document itself states that one of the functions of the Complex will be to serve as “a primary administrative unit of the public school system”. This will amount to the creation of a new bureaucracy involving duplication with that already existing in the form of the offices of the Block Education Officer, District Education Officer etc.

(c) It is indicated in the document that the CRCs and BRCs are to continue along with the Complexes. This is another layer of unnecessary duplication.

(d) In our reading, the entire suggestion regarding the creation of Complexes seems to be an attempt to cut expenditure on school education by not building all required schools, and providing them with all the required facilities and services, but to oblige them to share resources with other schools.

(e) The Complex idea will severely compromise the autonomy of the schools. Instead of taking decisions of their own on matters which determine their day to day functioning, the schools will have to look up to the Complex for most of the things.

(f) The Complex has been conceived as a super duper school overarching the schools falling under its jurisdiction. The functions described for the Complex in this chapter include practically everything – sharing teachers; employing social workers; counsellors and volunteers to be shared among schools; being a depository of equipment like computers etc.; maintaining libraries to be shared; ensuring the availability of infrastructure
facilities; ensuring integrated education; integrating ECCE with primary schools; taking care of the children with special needs; integrating vocational education; helping teachers in their professional development; and serving as a single point to deal with Government.

With such a monolith to oversee schools and provide essential facilities to them, the question of school autonomy becomes a myth. As already pointed out, CRCs, BRCs and Government offices at the local levels will also become redundant. The Committee apparently has not gone into the far-reaching implications of this recommendation. Every good public school, particularly at the secondary level, needs all these facilities and services and is required to carry out the above functions.

Our suggestion is that instead of undertaking the ambitious and the very expensive task of building Complexes of schools all over the country, the Government should concentrate on:

(a) universalising secondary education. For this purpose, a set of norms have to be established, a large number of schools have to be built, the schools are to be equipped, additional teachers are to be recruited and trained.

(b) the ECCE should be universalised. Pre-primary education (3–6 years) has to be integrated with the nearby primary schools.

(c) Since RTE has remained largely unimplemented, the first priority should be attached to implementing the Act. As we know, only 12.7 per cent of the elementary schools comply with all the infrastructure requirements laid down in the Act. These are formidable tasks which will call for massive manpower and huge amounts of additional resources.

The Government will be hard put to mobilise manpower and financial resources required for the above three purposes. Therefore, the question of spending any part of the available resources for building complexes which, as already pointed out, is highly undesirable from several perspectives, does not arise.

We are strongly against the merger and closure of schools in the name of rationalisation. It is apparent from what is happening on the ground that under this programme, hundreds of thousands of schools have been or are still being closed down. In their place, private schools have come up. Students of the poor and the marginalised sections of the population, who used to go to the schools which have been closed down, have no alternative but to discontinue their education because their parents cannot pay the high fees charged by the private schools. It is absolutely necessary that this programme should be brought to a halt. We regret that the Committee has not realised the gravity of this problem and made appropriate recommendations for preventing this process.
Finally, a word on the detailing of the functions of the SRCs by the Committee towards the end of this chapter. This is useful as this has not been done before in such details. But there are several controversial points about the manner in which these functions are described. One will have to go into them.
We would like to begin by welcoming some of the positive recommendations made by the Committee in this chapter. These are:

(a) The State Council for Educational Research and Training (SCERT) will be the apex body on all academic matters, including curriculum, textbooks, standards for teacher related processes and learning standards, for all stages of school education. The Committee has very rightly included in this system of research, training and standard setting, the CRCs, the BRCs and DIETs. But the Committee in its report should have recognised that these institutions have been decaying very fast for the past few decades and the decay has reached a point where they have practically ceased to serve the purpose for which they were established. Their invigoration and maintenance at a high standard should be one of the top priorities of reform in school education. This requires huge amounts of manpower as well as financial resources. The Committee should have calculated the cost involved in revamping these institutions and persuaded the Government to commit itself to providing the required resources.

(b) All curricula of all schools should be aligned with the National Curriculum Framework (NCF) and the State Curriculum Framework (SCF). This is essential for consolidating national unity and solidarity, based on the recognition of the pluralistic character of the country.

(c) New private schools will have to obtain a licence to start a school (LSS). This will be on the basis of self-declaration of the fulfilment of the requirements and criteria laid down by the State School Regulating Authority (SSRA) which will have to be endorsed by the local Panchayat and the School Management Committee (SMC), among others. The RTE Act also provides for prior permission in the form of a “certificate of recognition” for the establishment of schools and this permission is to be granted, among others, on the basis of compliance by the proposed school with norms and standards set out in the Act. But, this has been one of the provisions of the RTE Act for the implementation of which the Government has not taken any action or initiative. One has to see if a similar measure suggested in the Policy document will be implemented by the Government. In any case, the
RTE FORUM’S COMMENTS ON THE
DRAFT NATIONAL EDUCATION POLICY 2019

pre-condition for recognition should be not only the self-declaration but also a clear-cut commitment to apply the RTE norms.

(d) All private schools must form an SMC like any public school.

This is indeed an improvement upon the RTE Act which leaves a private schools free to decide whether it would set up an SMC . While endorsing this recommendation, it is important to underline that SMCs for all schools, including private schools, must be established democratically, with an overwhelming representation of parents in them. As it happens, this has not been the case with several of the SMCs set up by the public schools. But SMCs, on the whole have emerged as a powerful institution working for the implementation of the RTE Act. Therefore their extension to private schools is an important step forward.

We see merit in the separation of the functions of policy making and provisioning/operation of schools on the one hand and regulating them on the other. However, we have two fundamental problems with the model of regulation suggested in the document. Firstly, we do not believe that putting the information on the structure and operation of the school in the public domain and parents’ choice of schools based thereon is the way of regulating schools. In the conditions prevailing in India, parents’ choice of schools cannot be an effective modality of regulating schools. The vast majority of the parents who send their children to the nearby Government schools are incapable of exercising a choice of schools. Only the parents who can afford to send their children to private schools can exercise such a choice. But in the field of school education, demand far exceeds supply, particularly in the segment of secondary education. In such a market, even the parents who are economically better off cannot exercise a choice of schools. Thus, the exercise of a choice of schools by parents simply because better information is available on schools is a chimera.

Moreover, we believe that a system of regulation has to combine availability of information regarding schools with inspections. Inspection is not the cursed term as the Committee makes it out to be. Today, inspection has altogether disappeared from the school education system, which is a major factor responsible for the decline of the quality of education. Until the 1960s, inspections were common and served as an effective means of maintaining standards.

We believe that inspections should be restored in full measure. But instead of Government officials undertaking them, they should be entrusted completely to teachers in the CRCs. This will
ensure that inspection is done by those who are competent. This will also be much simpler using the existing mechanism rather than creating a whole panapoly of institutions recommended by the Committee.

It is worth mentioning in this context that several developed countries which provide school education through a Common School System leave no choice of schools for parents. In such a system, the admission to school is based on the neighbourhood principle. According to this, a neighbourhood is designated for each school and it is obligatory for the parents to send their children to this school and for the school to admit children in the neighbourhood.

Today, general administrators (IAS and Provincial Service Officers) have taken over the entire system of provisioning/running of education. Until a few decades ago, in almost all the States of India, only policy-making at the apex level was the responsibility of general administrators. Here also top level educationists were consulted and involved. The provisioning and operation of education was the responsibility of education service functionaries who manned the posts from the level of Director of Public Instruction or equivalent at the top to DEO, BEO at the field level. It is important to restore this model as a part of the reform of the governance of school education system. This may call for the creation of State Level Education Service.

The Committee has recommended a periodical survey for assessing student learning. According to the recommendation of the Committee, this will be conducted on a sample basis at the national level and on a census basis at the State level. Some of the benefits from these surveys, claimed by the Committee, are indeed valid. But is it really necessary to have State level surveys in addition to the national survey. The national survey will automatically be based on a survey of learning achievements in each of the States. The variations in the State level achievements can therefore be expected to be captured by the national survey. What is then the necessity of a State level survey? To conduct such surveys by the census method in each State, and repeating them every three years, will be very expensive for the country. Moreover, it is hoped that the surveys of academic achievement to be conducted would cover full range of educational outcomes and not only learning outcomes.

By far the most objectionable suggestion in this chapter is that the RTE Act will be reviewed comprehensively in order to ensure that “the mechanistic nature” of its recommendations, which are alleged to be input oriented, are made “more responsive to realities on the ground”. This characterisation of the RTE norms is not based on facts, is purely subjective and has been driven by the private school lobby. It is a pity that the Committee has bought wholesale this distorted view perpetrated by this lobby. On the contrary, many scholars believe that the RTE norms are utterly
inadequate and need to be expanded considerably. These norms are absolutely essential for enabling a child to come to the nearest place of learning, to have a roof over its head, have essential facilities like drinking water, a functioning toilet, and a place to sit. What is the scope of revising these norms to make them what is called more flexible? What is really needed is to revise them upwards so that the children can get their education, to use the Committee’s own words, in a safe, secure and pleasant place.

We are against the local determination of norms to be applied to a school. This will make a mockery of the idea of common norms and standards which are essential for ensuring minimum quality and for preventing discrimination. This free for all approach is the best device to thoroughly undermine the objective of setting common norms and standards for all schools in the country.

These norms are now the legal rights of the elementary school children. Any downsizing of these norms will amount to curbing these legal rights, which may not stand the scrutiny of judicial review. There is, of course, an urgent need to amend the RTE Act if for no other purpose than to fix a new deadline for its implementation and to incorporate in it some of the essential additional measures advocated by the civil society organisations, public, intellectuals, and social movements. Some of these measures, like extending it to a few years of pre-primary education and to secondary education have been accepted by the Committee also. It will serve the national interests best if the RTE Act is amended quickly to incorporate these measures.

Instead of doing this, the Committee seems to be veering towards a new comprehensive legislation instead of the RTE Act. The Committee’s purpose behind such a new legislation seems to be to pave the way for the rapid progress of privatisation of school education. The Committee suggests that the RTE norms should be watered down in order to empower, among others, “public spirited private schools with the ability to locally determine optimal practices regarding infrastructure, curricula, pedagogic methods, syllabi etc.” The report sets a very high store by the so-called “public spirited private schools”. This kind of schools has been hardly visible during the entire period of post-independent India. What is then the basis of assuming that they would now suddenly emerge on the horizon and start playing a dominant role in universalising school education? Private schools in any case are not supposed to be operated for profit and there are state legislations prohibiting them from doing so. In spite of this, it is widely known that there are all charging fees of one kind or the other.

The Draft Policy document seeks to provide freedom to private operators to open and operate schools and to determine the school fee structure. The document separately invites the corporate sector to invest in education. This will result in the further privatisation and commercialisation of
RTE FORUM’S COMMENTS ON THE
DRAFT NATIONAL EDUCATION POLICY 2019

school education. In our view, education being a public good, it is the responsibility of the
Government to finance, open and operate schools in the public sector. We, however, realise that
privatisation of school education has already progressed rapidly in India. These schools should be
brought under strict regulation to prevent profiteering in this sector, to maintain minimum level of
quality in these schools and to ensure that they serve the public purpose, as laid down in the Indian
Constitution.

The reason why private schools are to be promoted are not specified in the document. There
is scarce evidence worldwide to suggest that these schools by definition deliver better quality
education, on an equitable basis. On the contrary, there is evidence that a school education system,
financed, operated and controlled by the State, has played a crucial role in enabling all the countries
that are developed today, to reach the present position. The Policy document should have therefore
made an explicit recognition of the role that public education plays in providing quality and equitable
education on a wide scale.

The Committee has recommended that schools such as “Gurukuls, Madarsas, Pathshalas,
home schools, alternative schools etc. will be enabled to deliver quality education and participate in
the education system”. Thus, “a wide variety of schools can be recognised and enabled to deliver
quality education”. This recommendation has several dangerous implications. Firstly, there is no
provision in any central or state law on home schools. Secondly, the term “alternative schools” has
in recent past meant places where literacy and numeracy are imparted through a make shift
arrangement. According to the RTE Act, there is no place for such schools in the school system.
Moreover, schools such as Gurukuls, Madarsas and Pathshalas should be allowed to join the national
and state school system only if they strictly abide by the Constitutional values of diversity, equality
and secularism and do not force upon children particular religious practices or lessons.

Lastly, the “wide variety of schools” prevailing in India is a real bane of the school education
system in this country. This has perpetuated inequality and discrimination in the school system and
sharpened the social division in the country. The move in the future should be towards getting rid of
this variety based on class and religion rather than encouraging them to flourish and grow further.

The Committee, in its report, has expressed itself in favour of no detention of children in
Grades up to Classes VIII. However, instead of suggesting that the amendment carried out to
remove the no detention clause should be revoked and we should revert to the original clause of the
RTE Act, the Committee simply recommends a review.
RTE FORUM’S COMMENTS ON THE
DRAFT NATIONAL EDUCATION POLICY 2019

We are happy to see that both private and public schools will be brought under the purview of the new system of regulation recommended in the document. But what is the significance of it when the regulation itself is far from rigorous and when the avowed purpose is to incentivise private schools.

Lastly, the document should have come out categorically against the use of schools for prolonged periods, as shelters, relief camps, and a place for the installation of security arrangements.
Rashtriya Shiksha Aayog (RSA)

The Committee has proposed the creation of a National Education Commission (Rashtriya Shiksha Aayog) as an apex body, for Indian education. The Prime Minister of India will be the chairperson of this body. RSA will meet at least once a year or as often as is deemed necessary. It will have 20 to 30 members including Union Minister of Education, Union Ministers holding portfolios (e.g. Health, Women and Child Development, Finance) directly related to education, a few of the Chief Ministers of States in rotation, the Principal Secretary to PM, the Cabinet Secretary, Vice Chairperson of the Niti Aayog, senior-most Secretary in the Ministry of Education and other senior bureaucrats as appropriate. At least 50% of the members will be eminent educationists, researchers and leading professionals from various fields. Similar Education Commissions at the State level will also be created.

The RSA will be responsible for “developing, articulating, implementing, evaluating and revising the vision of education in the country on a continuous and sustained basis”. One of its functions will be to ensure “necessary cohesion and synergy between the multiple dimensions of education in the country”.

We are not in favour of creating such a Commission at the apex level covering all stages of education. Inclusion of politicians will politicise education and may even bring party politics in the realm of education, which will have serious consequences. Secondly, the size of the Commission is unwieldy, and not conducive to serious business being conducted at its annual or more frequent meetings. Thirdly, education at different levels have different sets of objectives, different problems and different requirements. For example, the principal objective in the realm of school education is to universalise quality school education seamlessly from the age group 3 to 18, whereas in higher education, problems relate mainly to evaluation, accreditation, courses development and maintenance of quality.

In view of the above considerations, we are in favour of creation of a small-size (10 at the national and 5 at the State level) National Commission as well as State Commissions for school education. These Commissions should be totally non-political and the representation of bureaucrats in them should be reduced to the minimum. Almost all the members should be eminent educationists, leading researchers, professionals and eminent intellectuals and activists working in...
the field of education. The Commission could include the principal bureaucrat in charge of education at the national and State levels.

The Commission will be a statutory body with quasi-judicial power. Its functions will include monitoring all aspects of the functioning of the school education system; ensuring the universalization of quality school education within the time period prescribed in the Act; the maintenance and upgradation of quality; conducting inquiries, research and audit with a view to suggesting improvement in the system; reviewing the norms and standards of the RTE Act; and suggesting their expansion and revisions in them; tendering policy advice to the Government; acting as the last court of appeal in relation to any grievance regarding the implementation of the RTE Act.
Addendum 1: Financing

We are disappointed by the manner in which the Committee has sought to deal with the problem of financing in its report. In our view, the best and the only feasible way to estimate the total amount of resources to be provided for school education is to define the objectives to be realised and the requirement of resources for that purpose. Each item which can contribute to the realisation of the objective should be costed. A sum total of the cost against each item should constitute the requirement of resources. This is the approach followed by a number of commissions set up in the recent past which were assigned, among others, the task of estimating resources. In each of these cases, the objective has been to universalise quality education within a given timeframe. The Committee apparently has not embraced this objective as it has not articulated it in specific terms in any part of its report.

Though different Commissions have adopted different set of norms to be fulfilled, their method of calculating the total amount of requirement of resources has been common and that is to proceed on the basis of a set of norms. From the above perspective, targets like a percentage of the current total public expenditure on education or of the GDP are not of great help. For example, if one goes about estimating seriously the expenditure to be incurred on a reasonably wide set of norms to be applied to school education, for children from the age of 3 to 18, and on reforms of higher education, the amount of resources that may be required may far exceed 6% of the GDP.

We welcome every suggestion which will lead to a sizeable increase in the resources for school education in India. From this point of view, the recommendation that “all States allocate 20% of their overall spends to education” and that the “Central Government expenditure has to double” is most welcome. However, this recommendation has many problems. Firstly, a ten-year period to reach the target of 20 per cent is too long, particularly when the RTE provided for universalization of quality elementary education within five years. Secondly, the document does not spell out how the States will be persuaded or obliged to accept and implement this target. Will there be a national legislation to this effect? Will it be possible to arrive at a consensus on adopting such a legislation? How will the progress towards the achievement of the 20% target be monitored?

Thirdly, as the document itself points out, some of the Indian States might already be devoting 20% of their budget to education. The problem therefore will be to persuade the States which are devoting much lesser percentages than the target of 20%, to raise their allotment for
education to 20%. Most of these States at the same time happen to have fragile financial conditions. Should not the resources expected to come from these States be provided by the Central Government if the target is to be met?

The Committee has adopted the method of allocating the 10% increase among key components in percentage terms. It has not indicated the basis of calculating the allotted percentages. Moreover, the components selected for additional allocation are inadequate and partial. No reasons have been given for omitting several items which should have been included. For example, additional funds are needed to increase the number of secondary schools in the public sector and to equip them properly. The funds will have to be provided for the non-academic staff of the schools or of the complexes. Funds will also be needed for the measures suggested in the document for guaranteeing safety. The basis of the distribution of the percentage increase among the selected components is also not explained. There is no way to find out whether the allocations have been made on the basis of requirements based on norms.

Though the Committee “reaffirms the national commitment of 6 per cent of GDP as public investment in education” it is done with the qualification that “this would only be possible as India’s tax :to :GDP ratio improves”. This is not a correct proposition. Firstly, the nation’s commitment to universalising school education and to the provision of financial resources for this purpose, should be absolute and not conditional, principally because this is now a fundamental right. Secondly, there is no empirical evidence that any of the Indian States or the Central Government has devoted more resources to education when the tax : to: GDP ratio has improved. Expenditure on education is basically a matter of political will to prioritise education. This has not happened in India since Independence. For these and other reasons, we do not share the Committee’s optimism that public expenditure in India will increase over the next few years. The assumptions made for making this estimation are very much based on speculation and not on empirical evidence.

In our view, there is no alternative to adequately financing education than by reprioritising education in the Indian budget and devoting all the resources required for universalising school education.

We do not share the optimism expressed in the document regarding philanthropy and the corporate sector providing larger and increasing resources for school education. We do not agree that philanthropy dried up in India because of the State’s control of education, particularly of the school education system. There is no empirical evidence to show that philanthropy provided much larger resources in the pre-independence period than after independence. Of course, in the very ancient times, Indian education was financed mainly by philanthropy. But it was philanthropy of a
different kind into which we need not go in the present context. Besides, if philanthropy is not profit seeking, then why should it be afraid of Government measures designed to regulate schools run on a profit basis.

Nor do we share the optimism of the Committee that the earmarking of 2% of the net profit by companies for social activities will bring in a sizeable amount of resources to education. There is no evidence that the action taken by the companies to meet this target has brought in large amounts of resources to the education sector. Though very few studies of the purposes for which the resources earmarked to meet this target, are available, there is evidence that most of these resources have been spent by the companies for the social development activities carried out by them in their own premises or outside for their own projects and institutions.

Note: RTE Forum’s submission on the draft NEP emerged through recommendations from thematic groups comprising members from different civil society organisations and several consultations held at the states as well as at the national level.