

Feedback from
All India Peoples' Science Network (AIPSN)
On Draft National Education Policy (DNEP) 2019

Introduction

The Kasturirangan Committee, hereinafter referred to as the committee, has contributed the Draft of National Education Policy 2019. It is a 484 pages document with main part being 398 pages covering 23 Sections and 38 pages with 14 Appendices. The committee followed up on the work of the TSR Subramanian Committee whose recommendations were discussed as the Inputs for Draft National Education Policy, 2016' in the Parliament on 10th August 2016. With the aim to draft a new National Education Policy the Ministry of Human Resource Development (MHRD) formed this committee in June 2017. The Union Government released the committee report as the Draft National Education Policy 2019.

The MHRD gave first one month and extended subsequently by one more month the deadline for submission of public feedback on the draft policy. The deadline ends on July 31, 2019. However, this time the Union Government is not waiting and taking forward the policy implementation process without discussing in the parliament. Already a beginning has been made with the policy implementation process by the Union Government with the pronouncements made and the allocations provided through the very first budget for the National Research Foundation (NRF) and the programme called "Study in India". The National Research Foundation (NRF) proposes to fund, coordinate, and promote research at the college-level. The Study in India programme has a focus on bringing foreign students to make India a "global hub of higher education".

It must be noted that, the education policy proposals require the Union Government to make major structural changes. In the NRF mechanism the Union Government has a plan to integrate the funds disbursed for research and development (R&D) activity through the socio-economic ministries. A significant part of the state investment for socio-economic research and development will be reallocated to the proposed NRF mechanism. The University Grants Commission (UGC) will be replaced by a Higher Education Commission of India (HECI) and that regulatory systems of higher education will be reformed comprehensively, the Finance Minister reiterated¹.

¹**The Finance Minister claimed that the new NEP will "transform India's higher education system to one of the global best education systems."** The Minister even credited the Modi government for the recent inclusion of (IIT Bombay, IIT Delhi and IISc) in QS World University Rankings. The Minister announced that an amount of Rs 400 crore will be provided for "World Class Institutions", for 2019-20- Rs 128.90 crore more in the revised budget 2018-19. The Minister announced the formation of National Research Foundation (NRF) and allocated Rs. 100 crores for the NRF from the budget of FY 2019-20. The Minister claimed that HEIs are becoming 'Centers of Innovation' and referred to SWAYAM (Study Webs of Active –Learning for Young Aspiring Minds), Global Initiative of Academic Networks (GIAN) and the IMPRINT (Impacting Research Innovation and Technology) scheme. While SWAYAM offers open online courses from Class IX to post-graduation free of cost, GIAN and IMPRINT focus on institutes like IITs and IISc, and announced how 'new-age skills' like Artificial Intelligence (AI), Internet of Things (IoT), Big Data, 3D Printing, Virtual Reality and Robotics, are going to create more than 28 lakh jobs in the country in the next few years. Currently, B Tech courses in AI are being offered mostly in premier institutions like IIT Hyderabad and IIT Delhi.

AIPSN is concerned that the Union Government has not waited for the completion of the process of public feedback. It is viewing the completion of the process of public feedback as merely a formality. The Ministry of Human Resource Development (MHRD) is already reported to be ready with the plans to implement National Tutor Programme (NTP). The national press is reporting that the NTP will now cover not only school education but also higher education. The NTP is a controversial programme because through the NTP the Union Government is expected to insert the students, retired army officers, homemakers and many others as volunteer teachers who are not qualified to teach either in schools or colleges.

The Union Government should not be implementing the draft policy proposed by the committee without public discussion in both the houses of the parliament and in the state legislatures. The feedback deadline is July 31, 2019 but the Government has not cared to meet the public request of translating this document in all the national languages of the country. The Ministry of Human Resource Development (MHRD) should be holding back on the draft policy implementation process. The Draft National Education Policy, 2019, hereinafter is referred to as 'the policy' in this feedback note.

Three parts to feedback

The feedback on the policy and the committee report is submitted by AIPSN to the nation based on the inputs drawn from the experts researching on education, the teachers working in the field of education and the scientists and technologists working in the AIPSN member organizations.

The feedback is given in three parts: Part 1 gives an Overview. Part 2 provides domain wise critique. Part 3 covers final remarks and demands. Those providing the inputs for this submission of AIPSN have actively worked with the member organizations of AIPSN in the field of education and research for several years. A summary of all the points made here has been provided separately. In addition points for an alternate proposal have also been put forward in another document along with this critique.

It is significant that even when the experts chose to acknowledge the observations made by the committee, they could not find much merit in the diagnosis or in the solutions offered through its proposals. They remained of the view that the committee has made not only many impractical or illogical recommendations but several proposals are dangerous and can harm the system of education. AIPSN is therefore providing also the ideas for the formulation of alternate policy proposals for an active consideration of the Union Government. AIPSN is committed to discuss the policy and the alternate proposals received for the mobilization of the public through the associations and platforms active in the field of education.

Part 1: Overview

Violations of constitutional obligations

AIPSN would like to begin the note with concern that the committee has been extremely selective about incorporating the Indian Constitutional values and mandates in the Policy². Secularism, socialism, equality, federalism will not be imposed are constitutional mandates. What all does "*the value of true rootedness and pride in India*" actually imply for the content and method of education is not even

²**Constitution is a devalued keyword in the committee report.** The principle guiding the committee is the aspirational goals of 21st century education, while remaining consistent with India's (selectively) traditions and value systems (p.24). Even while listing the constitutional values, the DNEP 2019 drops the words socialism and secularism, and incorporates among other things the value of a "true rootedness and pride in India" (p.96). Equality is interpreted to mean inclusion and equity.

elaborated by the committee. Going by the omissions or the absence of the mention made, there is virtually no place for the traditions, ethos and values and icons of the freedom movement³.

The policy completely reneges on the requirement of adhering to a balance of power between Centre and States provided constitutionally in the field of education. A highly centralized Rashtriya Siksha Aayog (RSA) is recommended. The policy proposes that the RSA will work directly under the Prime Minister. **Even in the countries that follow a presidential form of government this kind of extreme centralization in the sphere of education and research is not in place** (*Chapter 23*)⁴. The Prime Minister is accorded unlimited powers; the Prime Minister will make appointments and approve programmes. The Prime Minister also controls the bodies meant to steer and coordinate the system of education by design. Education system of a country of sub-continental size cannot be productively transformed by putting all the critical functions under the control of the Prime Minister.

AIPSN believes that there is a proposal to remove the safeguard of participation of the elected representatives of students and teachers in decision making. The policy commits to provide merely grievance redressal committees. It is a dangerous proposal. The safeguard of participation of elected representatives in decision making was won through the struggles of students and teachers against the tendency of the central and state governments to centralize the management and administration of educational institutions. At the level of the institutions of higher education the Vice-Chancellor has been designated as chief executive and given all the powers of management in the policy⁵. This is a dangerous proposal. It is clearly an attempt to change the status of academic institutions to corporate organizations that can be privatized by the government at a future date. Serious consequences of this approach to institution building will perhaps follow incrementally. AIPSN notes with concern that through its proposals the policy is structurally and institutionally closing the door on the social contract entered into by the Indian state with the people of the country and with the teachers and students for the expansion of the system of education for progressive social transformation and self-reliant development⁶.

The social contract being now reneged by the policy included the commitment that the Indian state will take the main responsibility of funding education. The Indian state will direct the publicly funded education system to fulfill the public purposes of social transformation and self-reliant national development⁷. The social contract included the commitment of the Indian state towards expanding the

³ AIPSN is concerned about the political capture of the idea of Indian traditions, ethos and values; the traditions, ethos and values of the freedom movement have been consciously abandoned to suit the party in power. The committee omits the mention of Preamble of Constitution and Directive Principles, Republic, Freedom Struggle, Secularism, Nehru, Subhash Bose, Maulana Azad, Bhagat Singh, Gokhle, Tilak, Vidyasagar, Ashoka, Sarva Dharma Sambhava, Ahimsa, Composite Culture, Humanism, Dravidians, Multicultural, Multireligious, Samkhya, NayayaVaishesika. The policy seems to be thus envisioning a future Indian society wherein the young ones would not rebel against the tendencies and practices reproducing inequality and discrimination.

⁴ See the *Chapter 23* on Rashtriya Siksha Aayog (RSA). **Appointments to all statutory bodies in the higher education sector will be made by the RSA – and will, by default, await the nod of the Prime Minister.** Appointees to the NHERA, HEGC, NRF, NAAC and all other standard-setting bodies will report to the RSA. They will be beholden to the Prime Minister. This means the DNEP's unashamed surrender to ruling party intervention. Higher education will have to be de-facto subservient to political interests. Autonomy has been circumscribed and reconfigured both structurally and ideologically.

⁵ See p. 316, the Chief Executive (the Vice-Chancellor) that there will be no elected members to any of the bodies/structures within the higher educational institutions (HEIs), other than some bodies of students-read the student bodies inclusion as the inclusion of those who are aligned with the ruling party.

⁶ Read p.241 along with *Chapter 17*.

⁷ The post-independent history of education was not without contradictory tendencies determining and influencing the project of national or social transformation through education. See Dinesh Abrol, 2007, 2010 and 2011 for the contentious history of higher education of post-independent India. After 1968 major struggles broke out to gain democracy in the administration of the educational institutions. These struggles were in part inspired by the student revolts for educational democracy in European continent.

access to quality education, the safeguarding of autonomy of educational institutions by involving teachers and students and the participation of students and teachers in the development of norms and standards of accountability. In the sphere of higher education, the social contract was taken further through the democratic struggles of the people by incorporating the principle of reservation for the socially disadvantaged sections in the student admissions and in the recruitment of the teaching and non-teaching staff.

This social contract was evolved to redefine the campaign for literacy and continuing education programmes during the decade of nineties. This social contract enabled the people to secure the formation of school management committees and the minimum norms to be followed by the schools under the right to education (RTE) Act during the first decade of 2000s. **A new National Curriculum Framework was adopted in 2005. It allowed the teachers and students to make changes in the curricula and text books. The policy is reversing the progress made as such through the hard-fought democratic struggles of the Indian people as a whole from all the regions.**

Takeover from within

AIPSN is of the view that the National Tutor Programme, home schools, volunteer teachers, community schools and alternate low-cost models of school education, philanthropic funding, private financing, market forces (read corporate interests) running not-for-profit institutions are designed to help the party in power to capture the system from within⁸. Rather than strengthening the norms and standards which the Right to Education (RTE Act) provided the policy will remove the norms and standards prescribed by the RTE Act through its proposed amendment. This legislative change will legitimize formally the entry of unqualified volunteer teachers and legitimize statutorily the place of shishu mandirs and ekal vidyalas in the domain of school education.

AIPSN notes with concern that the ideas of institutional autonomy and accountability have been reconfigured to gain a compliant, confirming and loyal intelligentsia. The proposals renege on all the statutory commitments given to the nation on a wide range of areas. The policy allows the takeover of education to the party in power from within. The policy offers complete monopoly over the processes of decision making to the party in power. The policy proposals will allow structurally and institutionally the Union Government to push the RSS cadres into the formal system of education to undertake the state takeover from within.

AIPSN believes that India's education system demands diversity, pluralism, democracy and freedom from fear and profit. Commercial and sectarian political ideologies can only harm the system. Public purposes should continue to guide the teachers, learners and society rather than the narrow political and private interests. While this retrogressive and unconstitutional step may suit for the time being the party in power but since the policy will kill the diversity and pluralism and can damage the education system AIPSN is committed to oppose the policy.

It is to be noted that, most of the existing safeguards were passed with the consent of the members of parliament belonging to the party now in power. Whenever the processes of centralization of power were attempted, the party now in power earlier opposed such moves of the previous governments in the Parliament and on the Street.

⁸ Political party capture would be also via home schools, flexible alternate models of school education and community schools, National Tutor Programme, Remedial Instruction Programme Volunteers, philanthropic funding, market (read corporate interests)

All pervasive social conservatism

AIPSN believes that the proposed structural change will occur through both the tight grip of the RSA and the Chief executives and the boards to be appointed by the Prime Minister. These appointments will happen without any kind of check and balance. The token presence of the opposition leader in a few select appointments will not prevent the takeover. The takeover of the state from within will also happen through the pathway of extreme privatization wherein the corporate and socially conservative entities have been again accorded absolute control.

AIPSN believes that the paths of extreme centralization and extreme privatization will also ultimately drive the country towards unfreedom and social bigotry. It is significant that the policy recommends not only a shift to the principles of market fundamentalism but also to complete reliance of the state on socially conservative traditions, ethos and values to revamp the system of education. In one stroke, the policy will allow the Union Government to reconfigure the existing framework of higher education. The proposed three Tier-systems of HEIs will also put under the hammer of the government more than 40,000 affiliated colleges accounting for more than 85 percent of the students. Since the policy will compel the colleges to remain in indeterminate state, and we do not know for how long, it is not very difficult to conceive that the policy will also make the managements and faculty of these institutions to closely align with and remain loyal to the party in power.

AIPSN believes that the third Tier HEIs will be the all-pervasive degree granting factories / diploma mills of the country, though providing education in theory to the unrepresented groups or the disadvantaged sections. These mills will help the government to fulfill the higher education target of 50% gross enrolment ratio (GER) by 2035⁹. The third-tier HEIs will be mostly self-financing, raising funds from private interests and meeting their expenses by raising fees from students. Autonomy of education from the governmental control will be talked more in theory. In practice, the complete control over education of the market mechanism and of the Union Government will be the policy outcome. In fact, to a significant extent this will be the story of all the three Tiers of higher education institutions. No one will be able to escape from the tyranny of market, traditions and centralized authority in practice. Even the Tier-I institutions will have also no immunity. The policy will be institutionalizing social exclusion and promoting adverse integration labelled as inclusion by the policy.

With a huge growth in the number of community-controlled colleges (Hindu, Sanatan Dharma, Arya Samaj, Brahmin, Rajput and Yadav or Sikh, Muslim, Christian and Parsi colleges) the public and private institutions will now be forced to comply with the dictates of the party in power. The political capture of educated minds through these institutions is at stake. Today as these institutions do not have the degree granting status and are an integral part of the affiliating university framework the problem of indoctrination of young minds is far more manageable. There would be subordination and silencing of the dissenting sections of faculty, students and administration at the individual institutional level. This is unacceptable to the democratic movement working actively for the development of a culture that is conducive for science, education, ethics and values of ecologically and socially just development.

The policy also allows home schools, low cost schools, caste and religion-based community schools and flexible alternate models of schooling. The story will not be very different in the case of school education. The space being created for the system of home schools, gurukuls, paathshalas and low-cost

⁹ It is in these autonomous colleges the policy proposes to locate the third Tier HEIs, achieve the target of 50% of GER by 2035 and educate the mass of students coming from the disadvantaged sections (*See Chapter 10*).

private schools (*Chapter 6, Equitable and Inclusive Education p 137-156*) has been and will be the playground for the RSS for takeover from within. The policy talks of institutionalizing a flexible market model with minimal regulations to give greater flexibility in order to create greater choices for students and healthy competition among schools. It has to be noted that this policy measure too will offer legitimacy to RSS backed organizations run schools, which are geared to cultivating - ideologically speaking - conservative values.

Extreme forms of privatization and centralization

AIPSN believes that the imposition of extreme privatization and centralization will harm the processes of integration and transformation of education, research and innovation activity. The policy will not help to solve the problem of growing wastage in education; forget about tackling the challenges of 21st century. India had up to now a countervailing force through the publicly funded universities, colleges and schools. This shield will certainly go because of a decline in the share of public funding in total funding. The role of academic leadership will be weakened as the control of private managements would grow over the system of education.

Philanthropic sources have been seen by the policy as an important financing mechanism¹⁰. Note that, private funds will have to be independently mobilized by the institutions from the communities and philanthropic sources for the realization of the institution development plans. Institutional arrangements proposed for the mobilization of finance can do permanent harm to the Indian system of education. The policy of financing will allow the Indian state to make all the institutions of school and college system dependent on funds tied to the private interests. The system of 21st century cannot be built on the funds to be provided by the finance capital, merchant capital and big business which has not only failed the traditional and conventional sectors of Indian manufacturing but also the new and emerging systems of technology development, innovation and production.

AIPSN believes that the negotiations of the faculty, students and administration with the government as well as the private interests over the role and functions of education, academic and industrial research, fundraising, management, policymaking, citizenship, community transformation, and academic entrepreneurship will have to take place under the gaze of the party in power required to protect the market mechanism and the gatekeepers of “Indian traditions”.

The cumulative grip of extreme privatization and centralization, combined with the control over the philanthropic financing, will allow the processes of integration of education, research and outreach missions and innovation activity to come under the influence of the big business and international funding agencies. The economic slowdown will make the philanthropic and private financing to take interest in education as an investment for profit.

Public funding box will remain empty

AIPSN believes that the increased public funding commitment to the extent it is spoken of is not going to be realized. The first budget of the Union Government has not ensured any kind of substantive increase in public funding in the case of either school or higher education domain. The Ministry of Human Resource Development consists of two departments: (i) school education and literacy, and (ii) higher education. In 2019-20, the Ministry has been allocated Rs 94,584 crore. In 2019-20, the Department of

¹⁰ The policy relies on the imagined benevolence and commitment of governments and on the growth of the economy (*p. 33, DNEP and Chapter on Financing*).

School Education and Literacy has been allocated Rs 56,537 crore. In the last 10 years, apart from 2019-20, the highest allocation was given in 2014-15 at Rs 55,115 crore. It has to be noted that in 2015-16, the allocation was reduced by 25%. The allocation has been on an upward trajectory since 2009-10, the Compound Annual Growth Rate (CAGR) has been 7%. It may be noted that Samagra Shiksha which subsumes Sarva Shiksha Abhiyan (SSA), Rashtriya Madhyamik Siksha Abhiyan and Teacher Education has been allocated Rs 26,129 crore against the demand of Rs 37,048 crore. Autonomous bodies like the National Council of Educational Research and Training and Kendriya Vidyalaya Sangathan saw a decrease in their allocation by 3.5% from the revised estimates of last year and were allocated Rs 8920 crore in 2019-20. Scholarships saw a decrease of 15.7% in its allocation in 2019-20. Note that, the money for scholarships is supposed to go to one lakh meritorious students of economically weaker sections. The Ministry provides Rs 6000 per year as scholarship and this allocation has been reduced in the latest budget.

The Department of Higher Education has been allocated Rs 38,317 crore in 2019-20, about 48% of the Department's expenditure has been allocated to central universities (as grants), Indian Institutes of Technology (IITs), and statutory and regulatory bodies (UGC and AICTE). The allocation to UGC and AICTE at Rs 5,059 crore, saw a 2% decrease over the revised estimate of 2018-19. While the Central Universities and IITs registered an increase in their allocation over the revised estimates of 2018-19 by 5% and 12% respectively, but it is to be noted that the bulk of the enrolment in higher education is managed by state universities and their affiliated colleges. However, the state universities receive very small amounts of grants from the Union Budget. Nearly 65% of the UGC budget is provided to the central universities. State universities and affiliated colleges receive only 35%. Much of the infrastructure is now supported through the Higher Education Financing Agency (HEFA). The HEFA has been allocated Rs 2100 crore for 2019-20, a 24% decrease over the revised estimates of 2018-19.

Expenditure on education (centre and states) as a proportion of GDP has been around 3 per cent during the period 2014-15 to 2018-19. Out of this 3% expenditure, roughly 1% is spent on higher education. The distribution of public and private institutions is skewed. Enrolment in public universities is concentrated in conventional disciplines (arts and sciences). Private institutions offer technical education, and it is to be noted that the lack of employable skills in students of technical education is an important issue. The government will be enhancing public funding is an empty promise is quite clear from the latest budget allocations.

AIPSN believes that the proposed pathways of “extreme privatization” and “extreme centralization” must be rejected and replaced with democratic control and state funding. Private not-for profit financing should be mobilized like a Cess is mobilized by the Central Government from the public. Corporates should be asked to contribute to a fund to be operated under the gaze of a body which has the central and state governments and the elected student and teacher bodies to influence the decision making on where and how to spend funds for what kind of public purposes.

Profit from degrees, diplomas and certificates

AIPSN believes that there would be many more new education shops producing paper degrees, diplomas and certificates to make the system much more costly and inaccessible for the economically and socially disadvantaged. Highly differentiated products in the form of paper degrees and diploma certificates from these colleges will end up as the predominant outcome. The dissatisfied producers, consumers and customers seeking return from their own private investment and competing in the market for the access to

education system would be much more common. Students will have to compete to gain seats in the privately-run colleges.

Imagine all of this is going to happen amidst an uncertain job market. Faculty will be focused on saving their contractual jobs and concentrating merely on the functional aspects of quality to survive in the job market. Education institutions would face difficulty in incorporating the public purpose (be human and social transformation or critical thinking). Ultimately the system of education would not be in existence to serve public interest.

In the case of several domains of technical education-engineering, medicine, management and teacher education there have been a plenty of market failures. Closure of higher education institutions is today understood as only market failures. But these closures have a huge social cost and need to be seen as a policy failure as well as a political failure. Note that, an important consequence of these shifts will be the system of education structurally preventing the disadvantaged sections from upgrading their livelihood prospects through newer and emerging areas of employment. There will be the reinforcement of existing barriers of caste, creed, gender and class.

Higher education institutions (HEIs) would have now many more barriers to cross to harness the latest advances in science, technology, social sciences and humanities for the benefit of public purposes and nation building. In many regions, the policy will deprive the producers and users the freedom to undertake ultimately multi-disciplinary collaborations for the co-design of solutions for the benefit of place / site specific goals of egalitarian, sustainable development and of progressive social transformations. It would become even more difficult for the system to realize the possibilities of place and field specific integration of education, research and outreach.

The policy will end up shifting the system of education to a new institutional arrangement where the owners of finance capital would also be able to far more easily push their way into education. Note that, the policy has chosen to open the front door to private philanthropic financing, foreign direct investment and international funds. Private finance will be controlling the directions and magnitude of investment of producers as well as of users of education system. Public investment was playing the role of driver and will now end up on the back seat.

AIPSN believes that all types of educational institutions will have to finance from multiple private sources of funds to survive and develop. This will cripple the system from inside. Private interests will have the license to directly interfere with the agenda of education and research. Consumers will be the students paying for the price of degree. Customers or users of competencies of faculty and students within industry and government will also suffer and lose. The policy promises not do anything to regulate tightly fee structure of the private institutions.

Post-truth political economy of education in making

AIPSN believes that the policy will formally promote the acceptance of the post-truth claims such as that how the Prime Minister has transformed the system of education and that how the critics of the Prime Minister are only contrarians and professional pessimists would be the meta-narrative of the political establishment. The elites, middle classes, public representatives would be asked to take a false pride in the Vishwa Guru status. The plan of political capture is a new element in the unfolding story of India's educational system. The logic of extreme centralization will end up in chest thumping by the government to make false claims to maintain its grip over the masses.

It has happened in the first budget of the Union Government when the claims were made with regard to the impact of Swayam, GIAN, IMPRESS and IMPRINT. Privatized educational entities would have the freedom to satisfy the regulatory institutions in a publicly opaque way. They will be offering commercially audited statements. They would only be meeting on the surface some standards of presumed quality. The quality would not mean anymore educational institutions actually in practice serving the public purpose, be relevance and excellence or social transformation or national development.

AIPSN believes that a lot of the anticipated harm will also come from the dependence of the new political and economic order on private finance and religious organizations, a new political economy in making. Evaluation of the performance of institutions based on the philosophy of “new public management” with the PM appointed boards/committees of institutions and agencies dominating the evaluation process and bureaucratic and commercial interests guiding the academic outcomes are going to an important outcome.

Diagnosis lacks in rigour

AIPSN believes that while the policy proposes to address the lacunae in the system at every level: access, quality and governance at every stage of education, but there is never any coherent convincing explanation for why the stated aims have not been achieved so far. The phrase "social justice" is conspicuous by its absence. In a 484-page document that devotes a considerable number of pages to India's past and its tradition in education there is no serious engagement with the political, social and institutional roots of the social divides that the system is continuing to reproduce without a major dent. The solutions offered by the policy suggests that the crisis of learning is due to (a) the mismanagement, (b) the people in the system not realizing that literacy and numeracy are fundamental, and (c) the problem of non-viable small schools.

The stark reality is that the "learning crisis" is far more among the socially and economically oppressed sections. The deep-rootedness of caste-based inequality in the system is the reason. There is a repeated mention of "merit-based" system. The stress on 'merit' signifies for the reservation system is misplaced. The committee members do not wish to take into account the concerns of the "Education of children belonging to Scheduled Caste Communities and Other Backward Classes. The systemic exclusion of Dalits from Indian education has received only half a page (*Page 148, Section 6.3*).

Technical fixes cannot fix social divides

The political party in power is pursuing the politics of upper castes and the land and business owning classes. It is putting the agenda of Hindutva for implementation in front and is refusing to acknowledge the centrality of caste, class and gender in perpetuating inequity. AIPSN believes therefore, the committee has taken the easy route of recommending school complexes, digital technology and volunteer tutors as the solutions. School complexes, digital technology and volunteer tutors cannot address the lacunae of learning among the disadvantaged sections of students. The policy did not even consider the option of common neighborhood schools.

The committee members have also anticipated the aversion of the political leaders to the idea of common neighborhood school. It was not even considered as a way forward to deal with the crisis of learning. This kind of bold measure will require the social and political will to come from the political leadership. The committee members knew well the predispositions of the socially conservative Hindutva inclined political leadership.

The policy speaks of small schools being "non-viable" and offers school complexes as the basic unit. This is in fact reasonable in urban and semi-urban contexts, and can give many of the benefits listed. But the policy suffers from the "one size fits all" malaise that it criticizes when it offers school complexes as the basic unit across the country as a universal solution. India has to address the problems of a varied geographical terrain where access is a significant problem.

Closing primary schools nearby and offering a more distant school complex would only aggravate the problem. Talk of providing special transport and bicycles in monsoon months or in northern winters seems illogical. **A dalit child whose parents are agricultural daily wage earners has little chance of demanding these facilities to work for her.**

Implicitly limited scope for liberal arts and humanities

While the policy speaks at length about STEM and the humanities and the arts, calling for extensive integration of these, and bats strongly for multi-disciplinary institutions, the problem is with the failure to understand why there is no effort for multidisciplinary and interdisciplinary collaboration or how come the STEM education is wary of social sciences. Critical thinking" requires openness to the ideas advocated by the philosophers and social sciences, science, technology and society studies. The committee is not willing to understand why the critical understanding of society, politics, democracy and power is unacceptable to the party in power. The university as a source of social and developmental transformation is entirely missing.

The four-year, 8 semester secondary school is an island in exams; before this stage, the teacher and the school are empowered with evaluation. After, colleges strive to become degree-granting institutions. But during these 4 years, all we have Board exams, and then national tests for entrance to HEIs. What about all that is said about autonomy and capacity building of schools? True, the student has the choice of taking three board exams each semester. Are there no other exams, or the rest would be school exams? That would be a logistical nightmare for schools (and these are large schools as envisaged); how much of the choice would be the student's and how much the school's? Who is to oversee and ensure genuine choice and what parameters would underlie such oversight?

Technology in education

The policy lays a major emphasis on the use of educational technology. Technology is equated with ICT (information and computational technology). The entire attitude to technology is reflective of the predominant culture in education that the policy itself seeks to change. Until children learn to work with their hands and gain comfort with wood, metal and soil, and directly experience how work transforms energy, their attitude to technology would be that of consumers, not creators of technology. Such working with material is also essential for science education and for relating to the world of work.

There are some statements about "hands on work" being "fun" which are perhaps well-meant, but distant from the everyday world of millions of children. Computational thinking (CT) is reduced (in one paragraph, occurring twice) to a set of techniques for problem solving by computers. While the inclusion of CT is welcome, it is unfortunate that CT's potential seems to have been largely missed. CT in school needs at least as much emphasis as the policy accords to data science in higher education.

Compromises on public accountability and quality

The policy treats public and private education "on par" at every step. Even when the document insists that education be "not for profit" pays little attention to the ills of rampant commercialization of

education that besets equally now the system of school and higher education. The magic wand of "light but tight" regulation is waved to cure this deep social sickness, and the policy talks glibly of "private philanthropic" institutions. The document that repeatedly calls for reliable data does not even pause to look for data on philanthropy and commerce in the private education sector in the country. The committee obfuscates the role of public / private schools and colleges; in a society which has a huge backlog to cover and suffers from the problem of growing inequality due to the path of economic development the role of government-aided private educational institutions is wrongly represented.

AIPSN believes that the policy makes a complete mockery of the notions of public accountability. The policy will allow the powerful to declare arbitrarily some existing institutions as useless. And even sometimes "the non-existing institutions" as the institutes of eminence". In fact, we can expect the rankings to be manipulated because finance capital will require the higher education institutions to manipulate rankings to mobilize funds, earn fees and attract students and faculty. Recently only the country saw the "Jio Institute", the non-existent institution, being declared by the Prime Minister Office and the MHRD as an Institute of Eminence. Education system has been unevenly developing and needed to receive now all the support in terms of infrastructure and faculty.

AIPSN notes with concern that due to the influence of finance capital the policy will end up reducing the evaluation of the quality aspect of education to functional dimensions of education. Education system should be viewing quality as transformation. Producing just a "best fit" with the existing system of labour markets is not transformation. Quality means transformation only when it is able to serve public purposes and achieve the constitutional goals of sustainable economic development, jobs, ecological and social justice. The committee has been impervious to the contending academic and political views on what kind of Indian values, ethos and traditions can be incorporated in the system of education without harming the future of the Indian society, polity and economy. The policy has been formulated without undertaking a rigorous analysis of the steps recommended by the previous commissions.

Impossible deadlines

The committee has set an impossible deadline for the restructuring of higher education system and the updating of National Curriculum Framework by the year 2020. The real options available to deal with the challenges of governance of education should be duly assessed. The proposed changes are controversial and need a patient discussion on the proposals made by the committee. The government should give the people a reasonable chance to debate the pathways as well as the aspirational goals of 21st century education. The timeline set in the proposed policy is quite unrealistic. The government should drop the programme of updating of national curriculum framework, 2005. The government should not steamroll the changes to curricula, syllabus and textbooks in a rushed manner.

Part 2: Domain wise critique

School education and early childhood education

AIPSN believes that the policy chooses to promote multiple alternate models and speaks of a flexible market model with minimal regulations to give greater flexibility. **Doing this, in the name of creating greater choices for students and healthy competition among schools, without fulfilling even the Right to Education (RTE) Act norms is a dangerous step.**

AIPSN notes with much concern that the policy is in favour of allowing gurukuls, paathshalas and madrasas for the promotion of schooling (*p.71, Chapter 2-3.12*). Thousands of schools have been closed or

merged in different states on the instruction of Niti Aayog¹¹. The policy will formally permit the government to make a shift to the schools run from homes with unqualified teachers and RSS pracharaks who will be entitled to financial support from the governments.

AIPSN believes that the policy gives an open license to the policymakers to include the huge industry of low-cost private schools. The policy proposes to support pathways to learning through non-formal methods, technologies, National Institute of Open Schooling courses and so on. The largest network of Rashtriya Swayamsevak Sangh schools, including its single-teacher Ekal Vidyalas in predominantly tribal regions would be the chief beneficiary.

AIPSN notes that the proposals of remedial instruction aid programmes (RIAP) by unpaid volunteers, the service of army officers, locally available social workers, women and qualified people actually make a mockery of the big talk of improving “teacher education” and of recruiting “qualified teachers” to revamp the system of school education. No class/grade specific teachers are proposed in the policy.

AIPSN believes that the policy is also framed with a view to open up the space for a larger participation of private sector. The committee has a major chapter on technology in education more with a view of reducing the reliance on teachers. The policy has failed to take a comprehensive view on the role of technology in education and online courses.

The policy recommends the implementation of National Tutor Programme (NTP) “where the best performers in each school will be drawn in for up to five hours a week as tutors during the school for fellow (generally younger) students who need help” (*p. 60-Chapter 2-2.5*). The committee forgets that the under achievers need to be taught by qualified teachers having proper training and maturity. The committee does not even ask from what kind of social backgrounds the so-called best performers and underachievers may actually belong in all the different regions of this country.

The policy has chosen to move away from the concept of common neighborhood schools. Equality of outcomes of National Curriculum Framework 2005 is replaced by mere access and participation without linking equality in education with the quality education. Universalization of education and quality in education are regarded as two opposing needs. While on one side the committee has argued for reducing the curriculum load, but also at the same time the policy has chosen to include the language learning load to more as well as classical languages like Sanskrit. The policy needs to attend to the promotion of mother tongue and national and local languages.

The committee has chosen to load the education system with the classical language like Sanskrit at the school stage. It is not desirable to load the young ones with a burdensome load of language learning for no rhyme or reason. The policy also recommends that the core components of the text books will be prepared centrally. The states are only permitted to adapt the centrally prepared books. Private agencies are also permitted to write and introduce the books in this manner.

The policy does not commit minimum support for the majority of the students, but proposes however the principle of more output from lesser input. The committee proposes school consolidation and rationalization-another name for closure and merger of schools. This is a clear prescription to handover

¹¹ The DNEP’s recommendation of ‘School Rationalization’ wherein schools with less than 50 students may be merged into ‘School Complexes’ is in line with the schools closed or merged through executive orders of MHRD and NiTI Aayog. *See Chapter 7, DNEP.*

the schools to school complexes to be built and run by the real estate builders. These are plans for education corridors and education cities. The insertion of corporate into school domain through this new route is also a step in the direction of extreme privatization.

The policy has failed to recommend a central role for a self-reflective and critically active teacher in the classroom. The policy dilutes elementary education to the implementation of foundational learning requirements. The policy has ended up laying the ground for the complete destruction of publicness, academic freedom, role of teacher and democratic governance of the quality of education. The policy discourages democratic participation of unrepresented groups and disadvantaged sections of the parents of students in the decision making. The proposed constitution of SMCs will not allow these sections to influence the system.

The policy of performance assessment and promotion of teachers by parents and other local members of School Management Committees is problematic and objectionable. This recommendation will end up harming the teachers from disadvantaged sections rather than transforming the system of school education. Even while the committee is well aware of the pathetic situation of teacher education and mentions the state of affairs regarding teacher education in many places in the report, but the committee did not care to include a chapter to discuss the latest advances in pedagogy and education.

The policy makes the imparting of elementary education through an unspecified “core” and through a system of public and private institutions maintaining only the minimum standards to be specified through a system of regulation that is tight but light. The policy allows the system to be monitored by a system of regulations which can be easily captured through alignment with the establishment of the day. The policy weakens the accountability of the administration to public representatives.

The policy will not help the country to reduce the student wastage. The policy provides public patronage equally to both public and private institutions at all levels. The policy does not prioritize the role and function of publicly funded school education to promote class mobility and equality in the Indian society. The policy will ultimately prevent the country from also reaping demographic dividend.

Furthermore, the policy has chosen to dilute the commitments made with regard to the observance of minimum norms and standards by all types of public and private schools under the right to education (RTE) Act as adopted by the Indian parliament. This dilution of the RTE Act in the policy will particularly increase the number of school dropouts among the poor people.

Higher education and research

AIPSN believes that the policy fails to address the problems of higher education with a constructive and progressive approach. The policy takes the route of dismantling rather than strengthening the framework of affiliated colleges in an organic way. The three Tier system of higher education is clearly a poor substitute for achieving either excellence or relevance in the existing system. While the policy sets up an ambitious gross enrollment ratio (GER) target of 50% by 2035 in the case of higher education, but how the target will be achieved even without binding the Union Government to making necessary funding commitment.

The mismatch that exists between the demand and supply side of higher education for the disadvantaged sections cannot be removed by shunting them to the third Tier of diploma mills. Further, since there is the problem of jobless or job loss growth that cannot be addressed by the policy on education alone, the committee has missed the opportunity to address what needs to be done to strengthen the linkages

of education with public employment to give the system of education the wherewithal to give work experience and reduce the wastage.

The policy did not think about how to strengthen the system of teaching universities or the affiliated colleges in an organic way. Instead the policy has chosen to focus on how to whittle down or shut-down the system of large affiliating-type universities. The policy has ended up making recommendations that are in practice going to negate the potential. It is possible to pool resources and improve the standards of affiliated colleges. But since the policy is geared to creating space for extreme centralization, extreme privatization and social bigotry it only talks about multidisciplinary education.

The policy explicitly mentions about how multi-disciplinary education is necessary to enable the building of competencies required for addressing the complex and wicked problems of urban planning, water governance, and management of energy, transport and environment. But the policy has no definite binding suggestion to make to the government. It is clueless about how the faculty and students would be given the wherewithal to gain the relevant experience and produce useful knowledge to build multidisciplinary collaborations and tackle the concerns of employability in a systemic way. Note that, presently all of these domains are tackled within the domains of public employment.

The policy could have easily addressed this connection if only it had thought concretely about the mechanism of public employment of three to five-year duration for all the graduates to be implemented by the Union Government. Public employment with full remuneration with the involvement of the educational institutions in the tackling of grand challenges is the need of the hour. India needs this kind of policy instrument to allow the students and faculty to participate in an organic way and build their multidisciplinary competencies. Without such help the higher education system would not be able to contribute systematically to the challenges of urban planning, water governance, management of energy, transport and environment.

AIPSN believes that the proposed three-Tier system of higher education institutions is not a transformative solution. **The policy does not provide a solution to the crisis of purpose, quality, funding and governance that has come to afflict actually the system of higher education.** The policy has chosen to conceptualize the Tier I HEIs as research universities. The policy expects that, over a period of two decades, a couple of institutions, say 150-300 (at another place the target is only 100), will belong to the Type I category, and each will aim for on-campus enrolments between 5000 to 25000 students.

The policy recommends that they will aim to become world-class research universities and compete with global institutions. Note that, these research universities would be granting undergraduate and post graduate degrees as a merit elitist good¹². Only a small section of student body will get admission. There will be a coaching industry to help this small section. Note that, however the conception of research universities has only envisaged undertaking research without even thinking about how are these institutions going to integrate research, teaching and outreach missions.

The Tier II HEIs will be just teaching universities without any kind of linkages with research and outreach missions, many of the Tier II universities are state level institutions supported quite miserly by state governments. Teaching universities will focus primarily on high quality teaching process across disciplines and programmes, including undergraduate, masters, doctoral, professional, vocational, certificate and diploma programmes. Note that, in a contradictory, impractical and illogical way, the policy also adds

¹² Six per cent of students who appear in these examinations or tests pass the eligibility. These institutions are more a way of excluding most of the promising ones and including a very few into the elite system of institutions.

that teaching universities will also be significantly contributing to cutting edge research. High quality teaching without research and funds is a pipe dream¹³.

The Tier III HEIs, as conceptualized in the committee report, are expected to graduate to degree or diploma or certificate granting autonomous colleges. AIPSN believes that in practice these colleges will get reduced to substandard degree granting factories. Autonomous colleges without any kind of public funding cannot be expected to make any kind of significant contribution to the challenges that the country faces and can address only through the expansion of good quality higher education. In fact, the Tier III institutions are only expected to contribute to meeting the target of 50 % GER by 2035.

The policy recommends that the proposed three-Tier system should also be including the domain of vocational and technical education as an integral component of higher education. It must be noted that, in a contradictory, impractical and illogical way, the policy also adds that over time, such institutions can also begin to conduct research across disciplines and introduce graduate programmes, and may thereby aim towards becoming either Type II or Type III Institutions. Although the policy promises to check profiteering using existing laws diligently, but see the details of the existing sources of private funding in the case of state universities in five states (CPRHE, NUEPA, 2017 study). All of this is fine in only theory but how the system of higher education will be supported for integrating this domain is not addressed specifically as the situation stands with regard to the existing gaps in the case of even private universities¹⁴. **The DNEP is full of such deceptive, false and illogical recommendations.**

Erosion of support for public purpose and funding

The policy calls for the rejuvenation of the educational sector through the mobilization of private philanthropic activity. All the educational institutions have been asked to mobilize faculty, funds, admissions and placement for students from all sources of funding. The policy is going to enable the philanthropic institutions to channelize funds to all types of institutions. At the level of infrastructure and funding arrangements and at the level of attracting and recruiting competent teachers for this domain, the policy proposes to treat both public and private universities on par. The policy proposes that all the higher educational institutions (HEIs) would need to prepare institutional development plans to mobilize private funds. They will have to set up the development offices to mobilize philanthropic funding to meet their developmental needs.

¹³ A multi-state study carried out by the CPRHE at NUEPA on the financing of public higher education institutions demonstrates how the sources of financing have undergone significant changes at the state level in India. The state level institutions, which account for 94 per cent of the enrolment, get meagre resources from the central government. The major share of public funding goes to central universities and institutes of national importance. Funding by the state governments is not sufficient for the sustenance of many state level institutions. The empirical evidence based on a study of different institutions indicates that student fees, income-generating activities, and self-financing courses constitute important sources of additional non-State resources in higher education. There seem to be wide variations in the capacity of institutions to mobilize resources from different internal sources. While institutions located in urban and resource-rich areas find it easier to mobilize resources, their counterparts in rural and resource-poor areas find it difficult to do so. In view of the decline in public funding and the difficulty in mobilizing resources, some of the institutions end up spending 96 percent of their recurring expenditures on salaries, leaving them with very little for the conduct of other academic activities in the universities. However, as pointed out earlier, the Central universities are less affected by the declining public funding in comparison with their counterparts supported by the state governments (CPRHE, NUEPA, 2017).

¹⁴ Sangeeta Angom (2015) from NUEPA, Delhi made a study of the output of private universities and pointed out the output is still low and maximum at degree level. Further, the research factor is very low performing, and, as such, enhancing research capabilities remains a challenge for private universities. As the examination system is purely internal in private universities, the quality of their product can always be questioned. As such, the engagement of external examiners by the universities can help in standardizing and even improving the quality of examinations. The infrastructure facilities provided in the universities too vary from one another, with some of them having sufficient facilities within their huge campuses whereas others are not even having their own campus while being housed in rented premises. Most of them have given importance to professional subjects rather than traditional ones.

Even in the current budget publicly funded institutions have been asked to rely on loans to be disbursed through Higher Education Financing Agency (HEFA). The policy recommends private funding for the objectives such as preparing the teachers for doctoral research, infrastructure establishment, faculty recruitment and development in technical and other area of tertiary education, teacher professional development and organizational funding in school education, research and innovation, and so on. Private finance will decide whom to fund from within the system of higher education institutions. Private funding will depend on the ranking obtained by the institution. Thus, not only the elite institutions but even the mass-serving institutions need to integrate the missions of teaching, research and outreach.

The policy speaks of uniform regulatory and assessment parameters for public-funded and private Higher Educational Institutions (HEIs), private-funding of institutional infrastructure through corporate philanthropy, CSR and capital markets, greater contingency in teaching appointments and career progression leading to more professional insecurity and inequity-all of these are coevolved mechanisms to reduce the reliance on publicly funded higher education for the mass of students and limit them to the Tier III higher education institutions.

The policy of Three Tier system of institutions is not expected to integrate all the three missions (research, teaching and outreach). In the design of Tiered system of I, II and III institutions, there will be also segmentation. There will be new silos. Since the policy is already proposing a private funding-based expansion and strengthening of higher education it is not difficult to foresee that India will have very soon an unevenly developing system of highly differentiated education which will be relying less on state funding, more on self-financing for survival and developing through largely private financing. This will be the fate of actually a large part of higher education system of 21st century-if the government is allowed to go ahead with this policy.

AIPSN believes that though in theory the policy claims to strengthen education as a quasi- public good but its policy proposals have ended up making education in practice as a commodity to be sold, purchased, consumed and appropriated. The policy is treating higher education as a commodity as well as a differentiated product to be sold and purchased. Scarcity is being created for no reason or rhyme where there should be no scarcity. A close reading of the fine print of the financing proposals also suggests that the committee has avoided committing to necessary and sufficient regular funding.

Notwithstanding all the lip service that the committee pays to the avowed public purposes in letter and spirit, the proposed policy has not been able to mobilize regular block intra-mural funding for post graduate education and research activity. Project funding rather than regular intra-mural funding for research will be the new normal. Unstable funding, project proposal writing will be the consequences of recommended financing proposals. The policy is implicitly far more devoted to figuring out how the proposals of increased private investment would be implemented. A new class of grant-making private institutions as part of the enabling mechanism will be coming into existence to support the existing institutions and to contribute to the establishment of new institutions. Public funding will go to those institutions which are in position to mobilize private funds.

AIPSN believes that the policy recommendations on private financing will end up creating new silos, disintegrating and damaging the system in practice rather than constructing anything better than what even exists with the proposals to build a three-tier system of degree giving higher education institutions. The policy proposes that business and industrial corporations and religious institutions will be

encouraged to contribute and appropriate pathways will be created to enable this kind of transition in the system of education.

Lacunae of vocational education

There are serious lacunae in many of the specific policy suggestions made in DNEP2019 regarding vocational education that would run counter to the stated objectives of the committee report in respect of the design, duration, curriculum and institutional locus of courses; entry and exit points in higher education institutions (HEI) and corresponding qualifications at entry and exit; correlation with demands for skills and knowledge in industry and professions linked to job mobility, skill upgradation and facilitation of life-long education (LLE); institutional location of imparting practical training/skills in HEI, polytechnics, training institutes etc., towards effective vocational education and the role envisaged for high schools/secondary education in vocational education. The policy suffers from considerable confusion regarding the loci of setting of curricula for vocational education courses, linking of vocational education with industrial needs and of vocational education with the skills component, and institutional responsibility for all these tasks.

Integration of vocational education poses additional challenges for academia in higher educational institutions. Educational institutions will have to be publicly funded to develop considerable expertise to be able to deliver on these expectations from them. They will also have to work closely with standards bodies within industry and with potential employers, so that the graduates from schools and colleges have adequate employment opportunities at the end of their education. HEIs providing vocational education which includes liaising with ITIs, Polytechnics, Industry etc., for skill-training etc., collaborating with National level institutions for vocational education and SCERT for training of vocational education teachers, curriculum preparation for courses etc. will face an impossible task. Individual HEIs can collapse under this burden. It can bring down the entire vocational education edifice of the policy.

AIPSN believes that the policy over-burdens HEIs with several responsibilities for vocational education including primary responsibility for practical Skills too, proposing that funds be provided to them for acquiring labs and equipment (*P.20.1.4*). This is again an impossible task and responsibility. Duplicating similar infrastructure is also not a feasible option. Surely it makes more sense to strengthen both HEIs and Skill training institutions such as ITIs, Polytechnics and working out an institutional arrangement that would enroll students for vocational education simultaneously placing them at HEIs for the Educational component and Skill Training Institutions for the practical skills component.

The policy proposes to hand over the responsibility to individual HEIs of curriculum preparation, stating that “the respective professional councils and the SSCs [Sector Skill Councils] will set the professional standards for each occupation in conjunction with the National Skill Development Authority (NSDA), based on the National Occupational Standards-Qualification Packs (NOS-QPs). It will be left to the universities and autonomous colleges to develop syllabus and curriculum for these courses (emphasis added) (*P.16.1.4*).

Private financing will not help in this beyond a point. Teachers for higher vocational education are not available. Calling upon HEIs to also act as ITIs with all the additional infrastructure, trainers etc. is not a feasible option. The policy fails to address the challenge of integration of vocational education in to HEIs.

Fault lines of healthcare education

The healthcare education section approaches the area from the viewpoint of maximizing opportunities for private sector in healthcare education, rather than public needs for health care. The overall

numerical shortage of healthcare professionals in the job market cannot be addressed without any consideration to the problem of distribution. There are some states and within all states some districts that are generating adequate or even excessive human resources and others which have serious short-falls. But addressing such inequity- by region, by state, by gender, or by more marginalized communities – requires public institutions and public financing in both healthcare education and in subsequent employment- and the policy is completely silent on it. On the other hand **some of the key measures proposed- the permission to educational institutions to charge any level of fees, the phasing out of diploma courses in nursing, the exclusive reliance on common national examinations at every stage- will all only worsen availability in regions with HR deficit and create an unemployable surplus in areas already having an excess.**

Limited, scholarships will not help. Even if they eventually become available cannot compensate for the high fees that private medical colleges are able to already set. Scholarships will not be enough to provide access to healthcare education for those living and wanting to work in all those regions which have the highest deficits in human resources. The policy must clearly call for increasing public investment in healthcare education and subsequent employment in those regions and states that have human resource deficits and that all healthcare education should be free or subsidized. While no doubt private healthcare education will continue, the imbalance in human resources development that is the leading characteristic of the current context can be addressed only by an expansion of public healthcare educational institutions.

While the policy recognizes the need for upgrading District Hospitals to act as healthcare education sectors, such district hospitals should not be outsourced to corporate healthcare providers and private medical colleges who require this linkage for access to poor patients as teaching material. There must be a clear commitment that these district hospitals that are upgraded to support education institutions shall be supporting public educational institutions that provide free or subsidized education and provides preferential access to those who are from under-serviced communities or willing to work there is missing.

On allied healthcare providers also the policy implicitly leads to generating human resources for corporate health care providers by corporate hospitals, when it states that “these training programmes will be hospital-based, at those hospitals that have adequate facilities, including state-of-the-art simulation facilities, and adequate student-patient ratio” The three jobs singled out are general duty assistants- a category that has not been defined, emergency medical technicians and laboratory technicians- and the difference between hospitals, other healthcare and educational institutes has been blurred. The challenges of training allied healthcare providers like pharmacists, occupational therapists, public health managers, epidemiologists and a wide range of para-medical skills- ranging from the community health workers, male and female multi-purpose workers, and mid care providers, mid wives, counselors etc., has not been considered.

The policy should be stating, that technical institutes of education generating a wide range of allied healthcare professionals should be closely linked to public hospitals and select not for profit hospitals and healthcare providers and different field training sites within district health systems to provide the wide range of practical training that the entire wide range of allied healthcare professionals needs. Such hospitals and field training sites should have adequate facilities, adequate staff and student-patient ratios as is required for practical training and mentoring. The policy proposals plan to further weaken an already weak regulatory regime. The suggestion to outsource accreditation and inspection of educational institutions to agencies and to limit statutory bodies to only standards setting, is effectively a form of de-regulation, as there can be no way to measure the integrity of these different agencies and the different conflicts of interest (s) private agencies would have.

But the central concern with the policy is its over-reliance on the common national examination (NEET type) at multiple points. Though justified on the name of quality, these are centralizing devices, which fail to be responsive to inequities and the needs of a diverse nation, duplicate and undermine university role, very ineffective in ensuring quality and with multiple unintended but inevitable consequences. There is a proposal of a common exit examination for the MBBS that will play a dual role as also the entrance examination for admission into postgraduate programs. This exit examination will be administered at the end of the fourth year of the MBBS so that students are relieved of the burden of preparing for a separate, competitive entrance examination at the end of their residency period. While the problem statement is correct, the proposed remedy would only make it worse. The students would now run behind coaching centers in their pre-final and years trying to learn the art of cracking MCQs.

The policy is also unclear about the number of attempts one can take the exit examination and what would be the fate of students who would clear one of the two examinations, but not the other. But the bigger problem is that such a nation-wide exit exam could logically be conducted only on a large scale with objective MCQs type questions and clinical skills and soft skills cannot be evaluated. Medicine is not just facts but includes a wide array of soft skills like ability to listen and document patient history, sound observation, building rapport with patient, skillful deduction in diagnosis and if these skills are not developed due to an emphasis on the MCQs and time during internships cannot compensate it. Even the NEET for entrance to medical education must be re-visited, on similar grounds- that it fails to provide for diversity, undermines affirmative action to find candidates for serving in difficult areas and reduces all assessment of performance to MCQ testing. While there can be little objection to a NEET examination for 15% of seats, states and universities can be allowed to have their own structured and transparent admission process. There is also a strong argument for states to rely only on school board final marks with some weightages applied so as to make the different board examination results comparable.

Too much of pan-India objective examination paves way for mushrooming of coaching industries that unnecessarily increases the medical education expenses and becomes a barrier for those who cannot afford such coaching. Too much of common entrance and exit exams undermine what is truly essential for providing proper healthcare to patient and create a completely flawed understanding of merit. Statutory bodies with adequate staffing can only organize periodic quality reviews and look at governance, inputs and processes within each educational institution to ensure minimum quality is maintained. While entrance and exit examinations must ensure fairness, transparency and quality in selections and certification, universities and state governments must have the autonomy to decide on what is appropriate to meet their healthcare needs for the majority of seats. Common entrance examinations for under-graduation and post-graduation should be limited to filling only 15 to 40% of the seats.

Instead of the mandatory universal exit examination, students could score themselves on national accreditation examination, on completion of their internship, so that employers (including government) can use this as one of the many considerations they look at for providing employment. This would provide the freedom needed for affirmative action to find the appropriate provider for many geographical and social contexts of vulnerability and special needs. With respect to the nursing cadre also these concerns on common national entrance and exit examinations apply- but this time supplying a much larger base for the coaching industry. A further concern is the damage that plans to phase out GNM like courses and have only BSc nursing will do to the availability of nurses in human resource deficit states and regions. There are also major syllabus revisions required. And then there is a proposal for periodic renewal of license through some testing procedure- while there is no such clause for any other category of service providers. The entire

section on nursing education should be re-examined in consultation with key stakeholders, the ministry of health and family welfare, the nursing council of India and in the states, associations of nurses, and others engaged with improvement of nursing and nurse education.

The proposal of a common one or two year across MBBS, dental and nursing examination and then allocating them is neither feasible, nor desirable. There are many who may want to opt for one of the streams and not all of them- and if they fail to qualify for what they want could get stuck. Further this implicitly calls for two NEET examinations, one for the foundation course and then again for allocation. The assumption that all these streams could manage with the same syllabus in the first two years needs to be questioned. As neither evidence nor experience supports this proposal, such innovations are best piloted in relevant contexts before being proposed for national adoptions. In a nutshell, the policy on healthcare education is unclear on its proposed reforms, contradictory to its stated objectives, paves the way for an unhealthy commercialization of healthcare education and does not conform to healthcare needs. There is a need for a comprehensive re-write of this section on healthcare education with more consultation of people who have less conflicts of interests than has been done for the current draft.

Agricultural education and research

The policy proposes to abandon the concept of standalone professional universities in the domain of agricultural research and education to give a push to multidisciplinary education. Various agricultural universities established in early 60's on Land-Grant pattern are highly specialized to cater to the requirements of especially small farmers from various agro- climatic conditions around the country. These universities are well equipped with research farms and laboratories. Dismantling of or merging of agricultural universities with universities providing general education will end up diluting quality. What is needed is actually the strengthening of the component of basic sciences and getting the institutions of agricultural research and education to recognize the diversity in ways specific to the sector of agriculture. If the policy is allowed to go ahead with its proposed plan, it can threaten self-sufficiency in food production (*P16.5.2*).

While the proposal of redesign of undergraduate education is a welcome step, but the emphasis on and inclusion of subjects to cater to the needs of private agribusiness is unacceptable. It will only serve the interests of the corporates and divert the attention of agricultural graduates away from farm research labs and encourage them to become the purveyors of unnecessary inputs and of commercialized extension services to poor and marginal farmers (*P 16.61*).

Proposed grants shared by Centre and States would result in low inflow of research grants since the state governments do have the problem of insufficient funds for agricultural research. Rather than leaving public research in agriculture to the vagaries of funding of state governments and private agri-business corporations the Union Government should increase the component of grants to the scientists working on basic sciences as well as problems of marginal crops and diverse regions to improve the livelihoods of poor farmers and secure food production through publicly funded research (*P16.6.5*).

More than 60 percent of farm land in the country depends on monsoon rains for cultivation of minor millets, oil seeds and pulses by small & marginal farmers. Issues such as drought mitigation, water management, nutrient management & soil health, cropping patterns in rain fed agriculture mostly cultivated by small farmers have been grossly neglected. The priorities of agricultural research and education need to be re-oriented to address problems such as water management, drought management (in the context of climate change), cropping patterns that support sustainable crop production and large-scale production of

quality seed in public sector farms. Rather than focusing modern biotechnology to GMOs that produce costly single season use expensive transgenic hybrid crops should focus on conventional areas such as plant pathology, soil sciences and convention crop breeding (with inputs from modern Genomics and marker election) to mitigate problems in rain fed cultivation. Student curriculum rather than focus on agri- business & management should aim to link research labs to small farms to attain high productivity, profitability and nutritional security in small farms.

Uncertainty of funding for research

AIPSN believes that the policy creates an uncertain future for independent academic and applied research. Compulsory perusal of research priorities that the political establishment will dictate, would be in effect determining the research, teaching and outreach outcomes. Neo-liberal policy frame of financing would become the new normal. The policy suggests how all sources of philanthropic activity will have to be undertaken by the “development office” in the HEIs. The development office will have the responsibility to mobilize funding from individuals, corporate social responsibility funds and community mobilization of funds. Further the policy makes even the less privileged for their education dependent on scholarships based on school performance, national testing agency scores. The policy will deprive the less privileged of quality education and restrict their social mobility by design. Further the policy even leaves the determination of the price of education to the private entities. The policy suggests that the market should be left free and chooses to implement a regulation which is “tight but light” to make the cost of education “reasonable” without describing what is unreasonable.

AIPSN notes with much concern that the policy did not even consider the possibility of the three-Tier system of HEIs to collaborate, co-create and utilize their place and field specific competencies and resources for public purposes. The problems of development that today the professions need to address in a trans-disciplinary way by co-producing knowledge and co-designing solutions require the place based higher education institutions to collaborate with the elite universities with global orientation. Systemic integration and public engagement challenges of the HEIs with the real world are consciously left out from both diagnosis and solutions by the policy. Strategies for the integration of the missions of teaching, research and outreach have not been concretely addressed. Today the HEIs cannot practice integrated scholarship because the eco-system of existing line departments of government, public sector and the national system (s) of production and innovation lacks in the mechanisms for linking all the relevant professions with the higher education institutions for research, teaching and outreach.

NRF a possible recipe for duplication of research

AIPSN believes that while the idea of one more funding source for research is welcome but the idea of National Research Foundation (NRF) needs much rethinking. First of all, it is suggested that the NRF will be focusing on the funding of competitive, peer-reviewed grant proposals of all types and across all disciplines. The existing research funding mechanisms of S&T departments also follow the process of competitive funding and peer review in the case of domain areas of science as well as engineering. Coming to the idea of seeding, growing, and facilitating of research at academic institutions, particularly at universities and colleges where research is currently in a nascent stage, through mentoring of such institutions by eminent research scholars across the country, hiring excellent young research students and faculty, and strengthening and recognizing existing high quality programmes at such institutions, it is again not a new idea. Schemes with such mandates are already in operation and do perform this role. The funding mechanisms of SAC, DST, DSIR, DBT, DAE, DOS, AICTE, UGC, ICSSR and ICHR also play this role for

universities. It is not clear how the NRF would be tackling the problem of duplication which is already the problem of even the existing research funding mechanisms in the funding of scientific and engineering research.

As far as the idea of acting as a mechanism of liaison between researchers and relevant branches of government as well as industry, so that research scholars are constantly made aware of the most urgent national research issues of the day, and so that policymakers are constantly made aware of the latest research breakthroughs to be integrated into policy and/or implementation in an optimal fashion is concerned, this is neither a new idea nor an idea as presented should be even pursued by the NRF. Certainly, there are grand challenges to be implemented under the direct gaze of the Prime Minister Office (PMO). But it is not possible for the PMO to steer and coordinate all the place based and field specific integration of research which may have to involve several or all disciplines. The funding arrangements need to be steered and coordinated by the state and district governments. Coming to the function of recognizing outstanding research and progress achieved via NRF funding/mentoring across subjects, through prizes and special seminars recognizing the work of the researchers, **it is not clear why the PMO should be involved in such a task at all.**

Part 3: Final remarks and demands

Final remarks

AIPSN believes that the idea of heavy promotion of traditions without open scrutiny and assessment is quite scary. Education should not be for the indoctrination of young minds, that too in 21st Century. The policy is emphatic about how learners will have to be taught about the importance of ‘what is right and what is wrong’ so as their actions should not be disturbing or worrying others. The committee has asked the government to implement the step of “heavy promotion” of Indian values, ethos and traditions (*p.283*). The committee is of the view that moral and ethical reasoning will have to be determined by traditional Indian values of seva, ahimsa, swacchata, satya, nishkama, tolerance, honesty, hard work, respect for women, respect for elders, respect for all people and their inherent capabilities regardless of background and respect for environment, etc.

The policy provides support to the Hindutava guided majoritarianism nationalistic tendencies. The policy has ended up proposing a centrally run programme of capacity building to be launched by the MHRD for its immediate implementation without caring that constitutionally speaking, education is a state subject. Public funds have been allocated from the Central government budget for this regressive step and a separate fund has been approved for the teaching of Indian traditions, ethos and values though a crash course to be run by the central government before 2020.

AIPSN believes that the contentions in place over the Indian traditions must be taught to students with an open mind. The committee does not even ask what are those Indian traditions, ethos and values that the teachers should not learn and teach in the schools and colleges. The need to question the regressive parts of Indian traditions, ethos and values did not cross the mind of committee members.

AIPSN believes that the system of education should also remain open to all sorts of ideas. Heavy promotion of critical thinking is the way forward. While in theory the policy seeks to create a new system aligned with the aspirational goals of 21st century education, but it lacked in courage to escape the narrow and sectarian interpretation of what are India’s traditional value systems. It is a monologue undertaken by

the committee on education on behalf of the government in power; what can be done to bring an end to caste, creed and gender discrimination through education is not on the agenda of the committee.

The policy will also end up ultimately legitimizing non-merit as merit, all to the benefit of “new brahmins”. The mass of young minds would be made to act like robots and pracharaks doing chest thumping and blaming the imagined enemies of the nation without demanding minimum human intelligence and showing compassion for the compatriots and from cohorts the responsibility for their counter-productive social actions.

Crisis of education will deepen

AIPSN believes that the policy will make the system substandard, costly and inaccessible for the disadvantaged sections. The idea of common neighborhood schools of Kothari Commission has been wrongly rejected. The idea of school complexes and special educational zones is going to promote adverse integration and social exclusion. The policy will exacerbate the exclusion of national languages, caste and creed (Minorities) and other underrepresented groups such as scheduled tribes and ethnic groups living in North, East, South and West.

AIPSN believes that the policy proposes to continue with the unjust, unscientifically designed schemes of merit testing, for example NEET, GATE and so on. The existing testing systems practice exclusion of the disadvantaged sections. The policy has missed a major opportunity to make the changes in testing schemes. The committee is explicit that the government should not burden the private institutions with the implementation of provision of reservation in faculty recruitment and admission of students (*p.334*).

The proposed policy will have grave consequences for the practice of teaching and learning. The policy enables structurally the system of education to institutionalize new social divides and restrict social mobility of the educationally and socially backward classes through the creation of new silos. The policy will end up making the problem of wastage of education even more acute. The policy will enable the substandard higher education institutions to proliferate and survive with the full sanction of the state.

The Committee report should be debated in all the state legislatures. The people of India should be allowed to debate in the public without fear of reprisals. The far-reaching recommendations that the Committee has made with regard to the Indian system of education needs a social scientific analysis and involvement of educationists and researchers of repute and proven standing and the involvement of lay citizens. The policy is deciding their fate and the future of India.

The policy should be redrafted after wide ranging consultations in line with constitutional provisions and values for which the movements of teachers, students and others have fought consistently to reiterate commitment to basic free and compulsory education through a system of neighborhood school and college programme to ensure all girls and historically deprived sections get access to quality public education.

The policy needs to incorporate the constitutional safeguards against extreme centralization. The policy should not shy away from implementing the time-tested mechanisms of participatory democracy. The proposed timeline of implementation of substantive proposals of the committee namely the immediate and rapid restructuring of higher education and the updating of National Curriculum Framework by 2020 implicitly reveal the implicit thinking.

The committee has suggested a totally unrealistic timeframe for the implementation of recommendations on the higher education. The policy will further aggravate the crisis of education system.

We demand from the government to translate the document in all the national languages and consider the feedback from all the sections with an open mind. India would heavily suffer by implementing the policy recommendations. India will experience several types of systemic inabilities and falter in a big way with the emerging challenges of development and nation building.

The social responsibility of transformation of socio-cultural, economic, political and cognitive landscape will have to be borne far more by the people struggling outside the class room to deal with the challenges of building a just and democratic Indian society in the near future. But since the policy rejects the mechanism of participation of elected representatives of students and teachers in the decision-making bodies the mandates, funding and governance structure and the decisions for curricula, syllabus, admissions and placement would be beyond the direct influence of the faculty and students.

Demands

School Education

- ✓ Neighborhood crèche for 0-3 absorbing anganwadi workers as regular employees as feeders into neighborhood early childhood education 3 to 6 schools;
- ✓ Neighborhood common school based free and compulsory quality public education for 7 to 18 years;
- ✓ Provide freshly cooked breakfast and lunch to all children in all schools using common kitchen and dining arrangements and with regularized mid-day meal workers recruited locally as part of the national school nutrition service and ban all packaged and pre-cooked food;
- ✓ Ensure all the employees of organizations receiving public aid irrespective of their affiliations (public servants, government offices, institutions and professions, public and private organizations in the business sector, non-governmental organizations, public representatives, etc., send their children to neighborhood common schools;
- ✓ National Tutor programme to be replaced by full time state level teacher recruitment to serve in neighborhood common schools;
- ✓ Common norms for all schools whether aided or otherwise;
- ✓ Expand the formal schooling system on the basis of the guidelines of the RTE Act and do not dilute the Act;
- ✓ Elected school management committees with members from all the diverse sections including disadvantaged groups;
- ✓ Education for advancement of secular Indian traditions, transformative and cosmopolitan human values integrated from around the world with the emphasis on incorporation of respect for linguistic ethnic and religious minorities;
- ✓ No change in NCF 2005 without consulting the school teachers and parent associations;
- ✓ Create a national education fund with a view to pool the contributions from philanthropic and corporate sources, tax corporate profits and make allocations and do not ask individual organization to mobilize funds separately on their own on the basis of projects to be submitted to the sources, be they are for profit or not for profit;

- ✓ Implement the formula of local language and English. No imposition of Hindi on any state. Leave the choice to the states.
- ✓ Emphasize on basic education in mother tongue; implement the provision of deprivation points to give preference to girls in schools and young women in higher education;
- ✓ National translation service for exchange of text books and resource materials between different state school boards and CBSE;
- ✓ National Library Network with a target of library in each village, school and college in all parts of the country with the Central and State funds allocated for the programme;
- ✓ Physical education needs to be strengthened with sports and games.
- ✓ Rethink testing and examination schemes; give states autonomy and provide reasonable scope for students to make their choices to suit their own considerations for livelihood and employment options.

Higher education

- ✓ Ensure all higher education institutions create facilities and resources for the integration of research, teaching and outreach; provide public funding and strengthen affiliated colleges and state universities.
- ✓ Do not widen the gap and strengthen linkages between state and central universities; do not run after global rankings; achieve excellence and relevance in an organic way;
- ✓ Scrap all the national entrance examinations for the next level of higher studies at the state level. Give autonomy to the states. Continue with national testing in the case of only central universities, Institutes of National Importance, world-class institutions, IITs, IISERs and other similar institutions.
- ✓ Take steps to democratize all existing systems of regulation and funding through provision for elected representation and through ensuring adequate women's representation in all committees for governing higher education.
- ✓ Provide low cost and affordable higher education as a right to all without diluting its scope and content; equal opportunity to women in technical, professional, higher and vocation education
- ✓ Work within the framework of the Central Universities Acts and the system of Reservation. All relevant Acts should be strengthened to ensure the policy of reservation is even followed by private players and their fee structure is regulated through legislation
- ✓ Bring all the existing assets and facilities of private higher education institutions under public control and link them with the existing university system, rather than disinvesting in the university system and separating regulation from funding
- ✓ Instead of opening Indic studies, HEIs can provide the space for linguistics studies and each State can be encouraged to have Central Institute of Indian languages.
- ✓ No to FDI in education; collaboration with foreign universities through only collaborative programmes in education and research.
- ✓ Support foreign students only from developing countries in Asia, Africa, Central and Latin America and Europe.