
**Concerns, Comments,
Critiques and Alternatives**
to Draft National Education Policy-2019

All India People's Science Network (AIPSN)

Central Secretariat:
Office of Tamil Nadu Science Forum (TNSF),
6, Kakka Thoppu Street, Madurai-625001
aipsnpublic@gmail.com

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Preface

The much awaited Dr.Kasturi Rangan Committee draft on National Education Policy was announced immediately after election results. When the Draft New Education Policy-2019 was released AIPSN wanted to give its feedback to the people and government. Unlike the Government, which prefers one voice, we want to hear many voices from people of diverse fields and state organizations. So we constituted a working group under Dr.Dinesh Abrol who started collecting inputs.

Good responses started pouring from member organizations of the states and individuals. Later it was circulated to all and adapted by AIPSN. Finally the responses were arranged properly and developed into segment wise feedback points to MHRD and NEP. Thanks to great effort of Dr.Kamala Menon and Mr. Raman the inputs were categorized and fed to the govt. website in the given time.

It is heartening to note that educationalists and intellectuals associated with AIPSN started writing critique of Draft NEP in various newspapers and media. In addition to our feedback their opinions were also included in this booklet. Hence the booklet becomes a rich resource book for taking forward as a campaign “education for all” which is missing in the draft NEP.

The draft NEP seems a nightmare. It goes a long way from constitutional obligations of Secularism, Socialism, Social Justice and Equality in education. It takes back India to medieval period. It promotes majoritarian Hindutva culture, wants to produce low level skilled labours as a part of

addressing the unemployment problems wherein the underprivileged are pushed to vocational education and obedient man power to corporates. It is fully based on Hindutva ideology on one hand and corporatisation of education on the other hand

This booklet will give all a great opportunity to meet the people to place the dangers of Draft NEP and put alternatives to people. By interacting with the people let us create a hope and mobilize the people to make changes in the policy. It is possible to change the policy when people start resisting. To cite an example of resistance and change, I wish to remind that resistance from Tamil Nadu on the compulsory imposition of Hindi as third language which led to it being withdrawn overnight. Let us build resistance against draft NEP at all levels. We thank all contributors and Tamil Nadu Science Forum for bringing the book on behalf of AIPSN

P.Rajamanickam
General Secretary, AIPSN.

1.

Feed back 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 but again extended upto Aug 15. 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 IIIT 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

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.

and method of education is not even 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

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, Ahmisa, 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.

⁴See 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.

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 institutionbuilding 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

⁵See 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.

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 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

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.

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

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)*

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.

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 2035 ⁹. 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

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).* legitimacy to RSS backed organizations run schools, which are geared to cultivating - ideologically speaking - conservative values.

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

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

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.

10 st 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).

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 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 notfor 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 spends 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

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.*

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 nonformal 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 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 that teaching universities will also be significantly

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.*

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

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).

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.

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.*

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.

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 massserving 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 multipurpose 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 nationwide 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 conventional crop breeding (with inputs from modern Genomics and marker selection) 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.

2.

Summary of All India People's Science Network (AIPSN) Feedback on DNEP

1. AIPSN is concerned that the Union Government has not waited for the completion of the process of public feedback. A beginning has been made with the allocations provided in the first budget of the Union Government for the National Research Foundation (NRF) and the programme called "Study in India". The Government is viewing the completion of the process of public feedback as merely a formality.

2. The Ministry of Human Resource Development (MHRD) is already reported to be ready with the plans to implement the contentious, controversial National Tutor Programme (NTP) for the facilitation of takeover of the system of education from within. The NTP will now cover not only school education but also higher education.

3. AIPSN notes that rather than strengthening the norms and standards which the Right to Education (RTE Act) provided, the draft policy will remove the norms and standards prescribed by the RTE Act through its proposed amendment. The National Tutor Programme, home schools, volunteer teachers, community schools, flexibility in schooling without even the RTE norms, and alternate low-cost models of school education, philanthropic funding, private financing, market forces (read corporate interests) running "not-for-profit" institutions in name, all of these mechanisms will help the party in power to capture the system from within.

4. AIPSN notes with concern that the ideas of institutional autonomy and accountability have been reconfigured to gain a compliant, confirming and loyal intelligentsia. The draft policy allows the takeover of education to the party in power from within. The draft policy offers complete monopoly over the processes of decision making to the party in power. The draft policy proposals will allow structurally and institutionally the Union Government to push the RSS cadres to undertake the state takeover from within.

5. The proposal reneges on all the statutory commitments given to the nation on all the important constitutional mandates of equality of national languages, secularism, social justice, balance in Centre-State relations and a wide range of areas of governance. The expansion of education will occur through community-controlled colleges (Hindu, Sanatan Dharma, Arya Samaj, Brahmin, Rajput and Yadav or Sikh, Muslim, Christian and Parsi colleges). The political capture of educated minds through these institutions is at stake.

6. The draft 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 wherein the Prime Minister will control by design the functions of steering and coordination, financing, accreditation, regulation and governance.

7. AIPSN notes that 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 draft policy. Therefore, the proposal to remove all the safeguard of participation of the elected representatives of students and teachers in decision making and to provide merely grievance redressal committees is a highly dangerous proposal.

8. AIPSN believes that the imposition of extreme privatization and centralization will harm the integration and transformation of education, research and innovation activity. 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.

9. AIPSN finds that the draft policy will not help to solve the problem of growing wastage in education or help to tackle the challenges of employability. Forget about education system tackling the grand challenges of 21st century namely agrarian crisis, climate change, urban squalor, transportation, energy, environment and water.

10. AIPSN notes that the increased public funding commitment to the extent it is spoken of is not going to be realized. The plans of economic take off are the basis of financing proposals of the committee. The proposed pathways of “extreme privatization” and “extreme centralization” must be rejected and replaced with democratic control and state funding.

11. AIPSN is concerned 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 draft policy promises not do anything to regulate tightly fee structure of the private institutions.

12. AIPSN believes that 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.

13. AIPSN notes that the draft policy will formally promote the acceptance of the posttruth 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.

14. AIPSN finds that the plan of political capture from within 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.

15. AIPSN notes that since the political party in power is pursuing the politics of upper castes and the land and business owning classes and is refusing to acknowledge the centrality of caste, class and gender in perpetuating inequity 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 draft policy did not even consider the option of common neighborhood schools.

16. AIPSN finds that while the draft policy speaks at length about STEM and the humanities and the arts, calling for extensive integration of these, and bats strongly for multidisciplinary 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.

17. AIPSN is concerned that technology is equated with ICT (information and computational technology); the entire attitude to technology is reflective of the predominant culture in education that the draft policy itself seeks to change.

18. AIPSN notes that the draft 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 draft policy talks glibly of “private philanthropic” institutions.

19. AIPSN believes that the draft policy makes a complete mockery of the notions of public accountability. The draft policy will allow the powerful to declare arbitrarily some existing institutions as useless.

20. AIPSN expects the rankings will be manipulated. 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 nonexistent 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.

21. AIPSN believes that 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 draft policy has been formulated without undertaking a rigorous diagnosis of the disease or the analysis of the steps that the previous commissions recommended.

22. AIPSN notes that the committee has set an impossible deadline for the restructuring of higher education system and for the updating of National Curriculum Framework by the year 2020.

23. AIPSN finds that 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 draft 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.

24. AIPSN is concerned that the draft policy does not commit minimum support for the majority of the students, proposes however the principle of more output from lesser input. School consolidation and rationalization is another name for closure and merger of publicly funded schools. This is a clear prescription to handover the schools to school complexes to be built and run by the real estate builders.

25. AIPSN believes that the draft policy has failed to recommend a central role for a selfreflective and critically active teacher in the classroom. The draft policy dilutes elementary education to the implementation of foundational learning requirements. The policy of performance assessment and promotion of teachers by parents and other local members of School Management Committees (SMCs) is objectionable. This recommendation will end up harming the teachers from disadvantaged sections rather than transforming the system of school education. The proposed constitution of SMCs will not allow the disadvantaged sections to influence the system.

26. AIPSN notes that the draft 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.

27. AIPSN notes that while the committee report explicitly mentions about how multidisciplinary 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 draft policy has no definite binding suggestion to make to the government.

28. AIPSN believes that the draft 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 faculty of educational institutions in the tackling of grand challenges is the need of the hour.

29. AIPSN notes that the research universities or the world class institutions have been granting undergraduate and post graduate degrees as a merit elitist good in India with disproportional funding going for a select few. Only a small section of student body gets admission. There is a coaching industry to help this small section. The draft policy is clueless about the role and conception of research universities and world class universities. The has only envisaged research as an adjective added without even thinking about how are such institutions going to integrate research, teaching and outreach missions.

30. AIPSN notes that the draft policy recommends that the proposed three-Tier system should be including the domain of vocational and technical education as an integral component of higher education. The draft policy also adds that over time the Tier II and III 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. High quality teaching or research without infrastructure, faculty and funds is a pipe dream. The Tier III HEIs, as conceptualized in the committee report, are expected to graduate to degree or diploma or certificate granting autonomous colleges. In practice these colleges will get reduced to substandard degree granting factories.

3.

The contents of the Draft NEP are not consistent with the vision statement

- **Dr.C.Ramakrishnan,**
President, National BGVS.

The basic vision of the document is stated at page

“The National Education Policy 2019 envisions an India centred education system that contributes directly to transforming our nation sustainably into an equitable and vibrant knowledge society, by providing high quality education to all.”

There can be no disagreement with this basic vision. The problem is that the contents of the Draft NEP are not consistent with this vision statement.

Transforming our nation into a modern knowledge society, from where it is today, cannot be done by casual declarations of intent. This is not just an academic task. It will require a close meshing of education policy with a vision/plan of economic development and employment generation.

If we are serious about this task, we must begin with a sober base line study of the present.

1. Absence of base line and homework deficit.

A base line completely lacking in this document. This is the first fundamental flaw in the Draft NEP 2019. There is no understanding of the ground reality, no narration of history,

progress and problems, no summary of relevant data, either in matters of economics and development, nor in the field of educational development. How deep is the disconnect with ground realities we will see later in this note.

The draft document laments:

“While crafting the Policy we had a serious problem with acquiring authentic data in both quality and quantity. Education policies are largely the outcome of analysing trends in the patterns of evolution of important parameters of education. A major effort is called for in the country for data collection, organisation, analysis and the building capability to study trends and patterns of the various aspects of education.”

There is little evidence that the data already available has been studied carefully in the preparation of the NEP 2019 project. The Chairman of the Kasturirangan Committee is the well known former head of ISRO. He would be aware about the amount of ground work and preparation that precedes a rocket launch. He would know that a rocket would never take off, with the kind of homework deficit evident in the Draft New Education Policy 2019.

2. Retreat from RTE and NCF 2005, in the guise of extending RTE.

The second fundamental flaw with NEP 2019 is that there commendations made are erosions of the rights of child Indian citizens already acquired under the RTE Act .

Education of ‘good quality’ for all child citizens between the age of 6 and 14 is a fundamental right mandated by

section 8 of the RTE Act. What is 'education of good quality' is also defined clearly in NCF 2005, which has been notified u/s 7 of the RTE Act.

The objective of DNEP 2019 in the area of school education is defined thus :

Objective: Achieve access and participation in free and compulsory quality school education for all children in the age group of 3-18 years by 2030.

This is a major retreat from RTE 2009 read with NCF 2005. The authors seem to be unaware of the existing provisions and rights under RTE and NCF 2005. 'Equality of outcomes' of NCF 2005 is replaced by mere 'access and participation' in DNEP 2019.

A strong aspect of the NCF 2005 is the linking of 'quality education' with 'equality'. NCF 2005 defines quality education as that which delivers 'equality of outcomes', not just 'equality of access'. The most fundamental flaw of DNEP 2019 is the abandonment of this perspective on quality for equality, which is, in fact, a central objective of the NCF 2005. Whether this is merely due to the insufficient study by the members of the Kasturirangan committee (KC) of the NCF 2005, or whether this is a deliberate omission by the KC, after due study of the NCF 2005, is an open question on which we will not surmise.

However, it is pertinent and necessary to reproduce here some excerpts from NCF 2005 on the issue of 'what is quality education'.

The formal approach, of equality of treatment, in terms of equal access or equal representation for girls, is

*inadequate. Today, there is a need to adopt a substantive approach, towards **equality of outcome**, (emphasis ours), where diversity, difference and disadvantage are taken into account.*

A critical function of education for equality is to enable all learners to claim their rights as well as to contribute to society and the polity. We need to recognise that rights and choices in themselves cannot be exercised until central human capabilities are fulfilled . Thus, in order to make it possible for marginalised learners, and especially girls, to claim their rights as well as play an active role in shaping collective life, education must empower them to overcome the disadvantages of unequal socialization and enable them to develop their capabilities of becoming autonomous and equal citizens.

This is further elaborated thus :

Another major concern is that quality school education has still not reached to a large section of our population. There is no doubt about some 'islands' of excellence, but the large majority of marginalised groups such as girls, socio-economically disadvantaged children, etc., do not get meaningful learning experiences in school, which will give them a sense of dignity and confidence. Curriculum design must reflect the commitment to Universal Elementary Education (UEE), not only in representing cultural diversity, but also by ensuring that children from different social and economic backgrounds with variations in physical, psychological and intellectual characteristics are able to learn and achieve success in school. In this context, disadvantages in education arising from inequalities of gender, caste, language, culture or religion need to be addressed directly, not only through policies and schemes

but also through the design and selection of learning tasks and pedagogic practices, right from the period of early childhood. Education must empower them to overcome the disadvantages of unequal socialisation and enable them to develop their capabilities of becoming autonomous and equal citizens. The National Curriculum Framework-2005 is focused on providing quality education to all children.

NCF-2005 has two very significant things to say about the twin major concerns expressed above. First, universalisation of education and quality in education are not to be regarded as two 'opposing' needs. They are complementary and reinforce each other. Quality cannot flourish for long in a society that is not based on equality and justice for all. Likewise, universalisation can be an empty slogan unless quality is assured for all. Second, NCF-2005 interprets the quality dimension holistically, departing from its narrow connotation of excellence in particular subject areas.

We have already agreed that 'quality' is inclusive of universalisation. The document clearly explains that quality is a systemic characteristic rather than only a feature of instruction or attainment. The attempt to improve the quality of education will succeed only if it goes hand in hand with steps to promote equality and social justice. Equality in education can be brought by enabling all learners to claim their rights as well as to contribute to society and the polity. Quality education should promote these social values necessary for a democratic society such as ours.

b. As is clear from the above , the crucial mandate of 'Universalisation of education of good quality', which is the substantive content of the RTE Act, is truncated in NEP 2019

to mere Universalization of ECCE. Except for one mention of Universalization of ECCE, in the entire document, the word 'universalization' is absent. While adding ECCE to the mandate of RTE is welcome, the price cannot be a withdrawal and retreat from existing rights under RTE 2009/NCF 2005.

The DNEP 2019, itself states, at page 26 : "In the decades since Independence, we have been preoccupied largely with issues of access and equity, and have unfortunately dropped the baton with regard to quality of education."

This, evidently, applies to its own perspective on quality education.

3. Inconsistency of DNEP 2019 with the rights and powers of states vis-à-vis the centre stipulated in the Indian Constitution.

Education is in the concurrent list. DNEP 2019 being a government document, its recommendations made have to be consistent with the Indian Constitution. **A government document cannot propose that the constitution itself must be amended to make space for its major recommendation.**

This applies to the entire content of Part IV, Chapter 23, titled "Transforming Education".

The recommendation made here is to concentrate all policy making and administrative powers in the hands of the Rashtra Shiksha Aayog. The relevant provisions are excerpted below :

The collective vision, under the leadership of the PM, of a body of eminent educationists, researchers, and

professionals, with their holistic understanding of the complex demands of the knowledge society will provide an effective high level direction to the national education endeavour. This will also ensure that the NEC/RSA is flexible, responsive and adaptive to the imperatives of a dynamic fast changing environment. Educational governance as a standalone effort will not achieve the desired success unless the rest of the components of the society have the appropriate attitude and culture. **This Policy, for its realisation in the coming years, would certainly call for extraordinary steps in governance, which are unprecedented, and in a sense will precede similar action that India would have to adopt in other national endeavours, in the context of realizing the totality of development.**

A new apex body for education - the Rashtriya Shiksha Aayog: A new apex body, designated as the RSA / NEC, will be constituted. The RSA will be responsible for developing, articulating, implementing, evaluating, and revising the vision of education in the country on a continuous and sustained basis. It will also create and oversee the institutional frameworks that will help achieve this vision.

Chairperson of the RashtriyaShikshaAayog: The PM of India will be the Chairperson of the RSA. The PM will convene a meeting of the RSA at least once a year, or as often as is deemed necessary, to review the progress of education in India in its totality, and to appropriately empower and motivate the RSA as needed through his/her authority.

Vice Chairperson of the Rashtriya Shiksha Aayog: The Union Minister for Education (UME) will be the Vice Chairperson of the RSA. The UME will provide leadership and chair key operating bodies of the RSA, as detailed in the following.

Over a period of time, as the roles and functions stabilise, the RSA will be given Constitutional status through an Act of the Parliament.

Rashtriya Shiksha Aayog Appointment Committee: A RSA Appointment Committee (RSAAC), consisting of the PM, the Chief Justice of India, the Speaker of the Lok Sabha, the leader of the opposition in Parliament, and the UME, will be constituted to enable the appointments to the RSA and to other key related roles and structures.

Executive Director of the RashtriyaShikshaAayog: The executive head of the RSA will be the Executive Director (ED), who will also be the Vice-Chairperson of the EC and a member of both the Standing Committees on Coordination (SCCs; see P23.10). **The ED will be appointed by the RSA** and will have the rank of Minister of State. The ED will be a person of eminence in education, with deep understanding of India's education system, a record of stellar public contribution, and broad experience of administration and leadership. The ED will have a five-year term of appointment, which will be renewable one time.

Membership of the Executive Council: The EC will have 10-15 members who **will be nominated by the RSA** for five-year terms which will be renewable just once. All members of the EC will be people with expertise, integrity, and distinction in their respective fields. Two-thirds of the members of the EC will be people from education and research. One-third of the members of the EC will be people who have significant leadership roles in administration, policy, and other fields of development. This will also include senior bureaucrats from the Ministry of Education, the Secretary from

the Ministry of Finance, and the Chief Executive Officer of the Niti Aayog.

Standing Committees on Coordination: The Vice Chairperson of RSA will also chair two SCCs. The first will consist of the Ministers of Education from all the States. The second will consist of Union Ministers from all the relevant ministries connected with education. They will be supported by the Joint Review and Monitoring Board (JRMB) (see P.23.14) to **ensure timely coordination and implementation of goals and targets associated with the vision for education articulated by the RSA.**

Responsibilities of institutions within the new regulatory framework: The responsibilities of each institution within the new regulatory architecture and framework shall be clearly delineated. The existing Acts under which existing regulatory authorities as well as professional bodies have been created shall be modified as necessary to provide an enabling framework; at the same time they shall be separately and collectively held accountable for the quality of educational outcomes in the country.

Overlaps in jurisdiction shall be avoided, and formal mechanisms for coordination between the bodies worked out by the RSA, which will be the apex body for education in the country (see Chapter 23). For this, each body shall be governed and run by an Independent Board (IB) consisting of people with expertise in relevant areas, integrity, commitment and a demonstrated track record of public service. **All the IBs shall be constituted by the RSA,** unless specified otherwise, e.g. for PSSBs - even in case of exceptions, the IB may have to be ratified by the RSA. **The chairperson and the chief executives of all the bodies shall be**

appointed by the RSA. These bodies shall be accountable to the RSA through their IBs

In the new structure proposed , the role of the states is limited as excerpted below :

Standing Committees on Coordination: The Vice Chairperson of RSA will also chair two SCCs. The first will consist of the Ministers of Education from all the States. The second will consist of Union Ministers from all the relevant ministries connected with education. They will be supported by the Joint Review and Monitoring Board (JRMB) (see P.23.14) to **ensure timely coordination and implementation of goals and targets associated with the vision for education articulated by the RSA.**

Rajya Shiksha Aayogs / State Education Commissions: Similar to the RSA, aRjSA/State Education Commission (SEC) **may be** constituted in each State, chaired by the Chief Minister with the Minister of Education, nominated by the chair, as Vice-Chair. The respective SECs can have as its members the ministers of education, ministers of other stakeholder ministries related to education, eminent educationists and professionals, and a senior representative from the RSA. **The creation of the SECs in the States will facilitate better coordination with the Centre.**

*The above represents a comprehensive disempowerment of the States in the sphere of education. With education in the concurrent list, the present rights of the states under the Indian Constitution are eliminated and they are reduced to mere **coordination** with the Centre and **implementation** of policies decided by the Centre. At the Centre, also, all effective powers are concentrated in the*

hands of a five member RSAAC, with majority representation to the ruling party.

At present the BJP is in power in just 10 states- four in the North East, two hill states (HP, Uttarakhand), and Jharkhand, Haryana and UP. The curtailment of the rights and powers of the states proposed by DNEP 2019 is unlikely to be accepted by the remaining state governments in the country.

4. The flawed Economic Foundation of DNEP 2019

The NEP 2019 is built on the following premise :

“Our ten trillion economy will not be driven by natural resources, but by knowledge resources.”

How valid or useful is this premise ? This is a basic question. An alternative premise could be

“The economy of the future will be based on a rational and sustainable utilization of the natural resources of the nation and the world , for which we will have to build India as a knowledge society.”

This is not a minor difference of emphasis. In fact it may be said that this is a fundamental issue of perspective.

The underlying presumption of DNEP 2019, repeatedly emphasized, is that Artificial Intelligence (AI) and the ‘Fourth Industrial Revolution’ (FIR), is going to solve the problems of our country- that ‘data’ is going to replace manufacturing and agriculture as the mainstay of the economy of the future. This is an astonishingly superficial and shallow understanding of

the matter, and is perhaps a consequence of the fact that there was no economist on the committee. This flawed understanding also underlies the recommendations in regard to the organization of research in India of the future.

'Artificial Intelligence' appears 26 times in the document. By contrast there is only one mention of '**manufacturing**' - in the context of 'computer aided manufacturing'.

4.a. Education and Employment

On a close examination of the document, a real disconnect between 'education' and the problem of 'employment' is apparent. **Unemployment** is mentioned only once. There is no mention of **job loss, jobless growth, employment generation, economic viability, cooperatives, industrial worker, industrial workforce**. '**Farmers**' are mentioned only twice.

The document has comprehensively ignored major sectors which are driving the Indian economy today and creating employment. Some examples below:

- ⌚ Absence of **railways, rail transport, road transport, water transport, aviation** Absence of **Communication technology, microwave, 4G, 5G, optical fibre, data transfer**.

- ⌚ Absence of '**Information technology**'.

- ⌚ Absence of **fermentation, leather, meat, protein, carbohydrate, oil, oilseeds**,

- ⌚ Absence of **cinema, television, entertainment, media, film industry, advertising**.

- ⌚ Absence of '**self employed**', '**self help groups**', **SHG**,

- ⌚ Absence of **tourism, travel industry**.

- ⌚ Absence of **retail trade, wholesale trade, trading**.

4 b. Education and modern ST

Shallow attention in the DNEP 2019 to the needs and requirements of modern STEM is also apparent in the following glaring omissions:

- ◆ Only one passing mention of **STEM**
- ◆ Absence of **Universe, Cosmos, earth, atom, molecule, atomic theory, periodic table, biochemistry, rare earths, carbon, silicon, material science,**
- ◆ Absence of **Darwin, Evolution, molecular biology, genetics.**
- ◆ Absence of **Inquisitive, spirit of enquiry, questioning attitude.** What is scientific temper without questioning ?
- ◆ The word '**Experimental**' is used only in the context of experimental kits
- ◆ Absence of **geometry, algebra, mathematical sciences, mathematical physics,** probability, mechanical engineering,
- ◆ Some catch words, but low on content – for example 27 mentions of the word '**ecosystem**', but no mention of '**ecology**', except one in the context of ancient India.

4.c. Education and Sustainability

The disconnect in the document from the vision objective of 'sustainability' is apparent from the following omissions:

- ☞ Absence of biodiversity, **forests, biomass.**
- ☞ Absence of **carbon, carbon dioxide, carbon footprint,**
- ☞ Absence of '**pollution**'.
- ☞ Absence of **global warming,**
- ☞ Absence of **resource depletion, non renewable**

resources, renewable resources, degradation, environmental degradation,

☞ Absence of **hydrocarbons, fossil fuels, fuels,**

☞ Preservation of language and culture, but **no preservation of the environment.**

☞ Absence of **waste, waste management, waste reprocessing, recycling,**

☞ renewable energy , solar energy , each mentioned just once.

5. The Cultural and Ideological blinkered vision of DNEP 2019

The attempt in the document to redirect and even censor the public discourse is apparent in the following omissions:

◆ Absence of **Directive Principles, Preamble of Constitution,**

◆ Absence of **republic, freedom struggle, freedom movement, secular, secularism,**

◆ Absence of **Nehru, Subhash Bose, Maulana Azad, Bhagat Singh, Mahatma Jotiba Phule, Savitri Phule, Shahu Maharaj, SayajiRao Gaekwad , B.G. Tilak, Ranade, Gokhale, Vidyasagar,**

◆ **Mahatma Gandhi** mentioned once

◆ Mention of **Chandragupta Maurya**, but no mention of **Ashoka.**

◆ No mention of **Shivaji, Akbar, Jai Singh,**

◆ Absence of **Thiruvalluvar, Tukaram, Dnyaneshwar, Basavanna, Sree Narayan Guru.**

◆ It has **'apnaapan'** but no **'sarva dharma sambhaava', 'ahimsa', 'composite culture', 'humanism',**

◆ Absence of **Dravidian, migration, 'peopling of India', multicultural, multireligious,**

◆ No mention of Samkhya, NyayaVaishesika ancient schools of Indian philosophy.

◆ In the name of 'multilingualism', there are 23 mentions of Sanskrit, 24- English, 12-Hindi, 5-Tamil, 3- Kannada, 3- Odia, 2-Malayalam, 2-Telugu, 2- Urdu, 0- Bengali, 0- Marathi, 0- Gujarati, 0- Punjabi , 0 – Konkani, 0- Kashmiri, 0- Nepali, 0- KokBorok etc. .

4.

The Draft New Education Policy 2019 – Basic blunders and Fundamental flaws.

Dr. Vivek Monteiro

Mob.7506648602

vivekmonteiro@yahoo.com

**There can be little disagreement with the basic vision
of the Draft NEP 2019:**

“The National Education Policy 2019 envisions an India centred education system that contributes directly to transforming our nation sustainably into an equitable and vibrant knowledge society, by providing high quality education to all.”

The problem with DNEP 2019, however, is not just in the details. It is basically and fundamentally flawed in at least four main areas.

1. Comprehensive Disempowerment of States

Its final chapter, Chapter 23 is its main flaw. To put it briefly, the provisions of this chapter grossly violate the federal basis of the Indian Constitution. Chapter 23 of the DNEP proposes to completely reformat the strategic policy and operational decision making structure of the Indian education system. It proposes to concentrate, in totality, all policy making and administrative powers in the hands of a Central Rashtra

Shikshan Aayog'. A few of the relevant provisions are excerpted below:

The collective vision, under the leadership of the PM, of a body of eminent educationists, researchers, and professionals, with their holistic understanding of the complex demands of the knowledge society will provide an effective high level direction to the national education endeavor.

*Educational governance as a standalone effort will not achieve the desired success unless the rest of the components of the society have the appropriate attitude and culture. **This Policy, for its realisation in the coming years, would certainly call for extraordinary steps in governance, which are unprecedented, and in a sense will precede similar action that India would have to adopt in other national endeavors, in the context of realizing the totality of development.***

A new apex body for education - the RashtriyaShikshaAayog: A new apex body, designated as the RSA / NEC, will be constituted. The RSA will be responsible for developing, articulating, implementing, evaluating, and revising the vision of education in the country on a continuous and sustained basis. It will also create and oversee the institutional frameworks that will help achieve this vision.

RashtriyaShikshaAayog Appointment Committee: A RSA Appointment Committee (RSAAC), consisting of the PM, the Chief Justice of India, the Speaker of the Lok Sabha, the leader of the opposition in Parliament, and the UME, will be constituted to enable the

appointments to the RSA and to other key related roles and structures.

The role of the states is limited:

Standing Committees on Coordination: *The Vice Chairperson of RSA will also chair two SCCs. The first will consist of the Ministers of Education from all the States.... They will be supported by the Joint Review and Monitoring Board (JRMB) (see P.23.14) to ensure timely coordination and implementation of goals and targets associated with the vision for education articulated by the RSA.*

RajyaShikshaAayogs / State Education Commissions: *Similar to the RSA, aRjSA/State Education Commission (SEC) **may be** constituted in each State, chaired by the Chief Minister with the Minister of Education, nominated by the chair, as Vice-Chair. The respective SECs can have as its members the ministers of education, ministers of other stakeholder ministries related to education, eminent educationists and professionals, and a senior representative from the RSA. **The creation of the SECs in the States will facilitate better coordination with the Centre.***

*Chapter 23 proposes a comprehensive **disempowerment of the Indian States in the sphere of education.** With education in the concurrent list, the present rights of the States under the Indian Constitution are eliminated and they are reduced to mere **coordination** with the Centre and **implementation** of policies decided by the Centre. At the Centre, also, all effective powers are concentrated in the hands of the five member RSAAC, with majority ensured to the ruling party.*

The Kasturirangan Committee (KC) which formulated the DNEP 2019 included some very eminent persons, with a record of high achievement in their areas of specialization. Therefore it is difficult to understand how they gave their approval to Chapter 23. Though expert in their specializations, they appear to be politically uninformed and unaware of fundamental provisions of the Indian Constitution in regard to federalism and education.

However, those who ultimately drafted the DNEP 2019 are aware about the constitutional obstacle. This is clear from one sentence which recognizes that the recommendations will require amendment to law :

Over a period of time, as the roles and functions stabilise, the RSA will be given Constitutional status through an Act of the Parliament.

The DNEP 2019 is a document published by the MHRD - a government body. Any government document must necessarily be consistent with existing law. It cannot make recommendations which are in violation of constitutional provisions. Chapter 23 of the DNEP is therefore a basic blunder and foundational flaw, which cannot be rectified except by withdrawal.

Apart from this fundamental objection it is also difficult to comprehend how members of the Committee gave their acquiescence to the sweeping powers of the RSA and the RSAAC even on simple academic considerations. Were they not aware of the essential and close connect between education quality and academic independence ? At the risk of appearing ridiculous, it could be asked : would have they

assented to a proposal putting President Donald Trump in charge of all education in the United States ? But that is essentially what they are recommending for India !

2. Absence of base line analysis and the homework deficit.

A second major flaw of DNEP is its homework deficit. A base line is completely lacking in the document. There is no description of contemporary ground reality, no narration of history, progress and problems, no summary of relevant data, either in matters of economics and development, nor in the field of education .

On the other hand, the draft document contains the following lament :

“While crafting the Policy we had a serious problem with acquiring authentic data in both quality and quantity. Education policies are largely the outcome of analysing trends in the patterns of evolution of important parameters of education. A major effort is called for in the country for data collection, organisation, analysis and the building capability to study trends and patterns of the various aspects of education.”

Anybody familiar with the state of education in India, will be aware that absence of data is not the problem. There is a huge body of data on education at various levels which have been systematically collected and documented by many statutory bodies and institutions at the Centre and in the states over the years. The authenticity of this data is also not in question.

There is little evidence in the DNEP that the data readily available on the state of education in the country has been at all looked at in its preparation. The '*serious problem*' as regards data referred to above appears to be only a pathetic excuse for a **serious lack of homework**.

The Chairman of the KC is himself a well known former head of the ISRO. He would be undoubtedly aware about the amount of homework and preparation that precedes a rocket launch. He would know that with the kind of homework deficit evident in the Draft New Education Policy 2019, a rocket would not even reach its launch pad, leave alone take off..

3. Retreat from RTE 2009 and NCF 2005

A third fundamental flaw in the DNEP is in the area of school education.

The objective of DNEP 2019 in this area is defined thus :

Objective: Achieve access and participation in free and compulsory quality school education for all children in the age group of 3-18 years by 2030.

While this might appear to be a welcome proposal for extension of the coverage of the RTE to the age groups 3-5, and 15-18, it is actually a big step back from the existing provisions of right to **education of good quality** for the children between the ages of 6-14.

Education of 'good quality' for all child citizens between the age of 6 and 14 is a fundamental right mandated by section 8 of the RTE Act. What is 'education of good quality' is also defined clearly in NCF 2005, which has been notified under section 7 of the RTE Act. The members of the KC seem

to be unaware of these provisions and rights. 'Equality of outcomes' of NCF 2005 is sought to be replaced by mere 'access and participation' in DNEP 2019.

A central pillar of the NCF 2005 is the linking of 'quality education' with 'equality'. NCF 2005 defines quality education as that which delivers 'equality of outcomes', not just 'equality of access'. What DNEP 2019 proposes is therefore a dilution of the NCF 2005 and the abandonment of this perspective on quality for equality. Whether this is merely due to the insufficient study by the KC members of the NCF 2005, or whether it is a deliberate decision taken after due study of the NCF 2005, is an important but open question about which we will not speculate here.

It is pertinent and necessary to reproduce here excerpts from NCF 2005 on the issue of 'what is quality education'.

*The formal approach, of equality of treatment , in terms of equal access or equal representation... is inadequate. Today, there is a need to adopt a substantive approach, towards **equality of outcome** ,(emphasis ours), where diversity, difference and disadvantage are taken into account.*

A critical function of education for equality is to enable all learners to claim their rights as well as to contribute to society and the polity. We need to recognise that rights and choices in themselves cannot be exercised until central human capabilities are fulfilled . Thus, in order to make it possible for marginalised learners, and especially girls, to claim their rights as well as play an active role in shaping collective life, education must empower them to overcome the disadvantages of unequal socialization and enable them

to develop their capabilities of becoming autonomous and equal citizens.

Another major concern is that quality school education has still not reached to a large section of our population. There is no doubt about some 'islands' of excellence, but the large majority of marginalised groups such as girls, socio-economically disadvantaged children, etc., do not get meaningful learning experiences in school, which will give them a sense of dignity and confidence. Curriculum design must reflect the commitment to Universal Elementary Education (UEE), not only in representing cultural diversity, but also by ensuring that children from different social and economic backgrounds with variations in physical, psychological and intellectual characteristics are able to learn and achieve success in school. In this context, disadvantages in education arising from inequalities of gender, caste, language, culture or religion need to be addressed directly, not only through policies and schemes but also through the design and selection of learning tasks and pedagogic practices, right from the period of early childhood. Education must empower them to overcome the disadvantages of unequal socialisation and enable them to develop their capabilities of becoming autonomous and equal citizens. The National Curriculum Framework-2005 is focused on providing quality education to all children.

.... First, universalisation of education and quality in education are not to be regarded as two 'opposing' needs. They are complementary and reinforce each other. Quality cannot flourish for long in a society that is not based on equality and justice for all. Likewise, universalisation can be an empty slogan unless quality is assured for all. Second, NCF-2005 interprets the quality dimension holistically, departing from its narrow connotation of excellence in particular subject areas.

In the entire DNEP , the word ‘universalization’ is absent, except for one mention of ‘Universalization of ECCE’. The crucial mandate of ‘Universalisation of education of good quality’, which is the substantive content of the RTE Act, is truncated in DNEP 2019 to mere ‘Universalization of ECCE’. While the addition of ECCE to the mandate of RTE is welcome, the price cannot be a withdrawal and retreat from existing rights of school children.

What the DNEP 2019 states, (page 26,) that “In the decades since Independence, we have been preoccupied largely with issues of access and equity, and have unfortunately dropped the baton with regard to quality of education”, **evidently, applies to it’s own perspective on quality education.**

4. The Missing Concerns

It is not only the word “**Universalization**” which goes missing in the document. Several other missing concerns speak loudly about the real concerns of the DNEP 2019, and constitute a fourth fundamental flaw.

A real disconnect between ‘education’ and the problem of ‘employment’ is apparent. **Unemployment** is mentioned only once. There is no mention of **job loss, jobless growth , employment generation, economic viability, cooperatives, industrial worker, industrial workforce.** ‘**Farmers**’ are mentioned only twice.

The document has also comprehensively ignored major sectors which are driving the Indian economy today . The examples given below have not earned even a single mention in the DNEP, despite being among the main drivers of employment and growth in the Indian economy :

- ◆ railways, rail transport, road transport, water transport, aviation.
- ◆ Communication technology, microwave, 4G, 5G, optical fibre, data transfer.
- ◆ 'Information technology'.
- ◆ fermentation, food preservation,
- ◆ leather, meat, protein, carbohydrate, oil, oilseeds,
- ◆ cinema, television, entertainment , media, film industry, advertising
- ◆ 'self employed', 'self help groups'
- ◆ tourism, travel industry.
- ◆ retail trade, wholesale trade, trading.

There is scant attention in the DNEP 2019 paid to the needs and requirements of STEM (science, technology, engineering, mathematics) education, which is considered essential for a modern society. There is just a single mention of STEM along with the following glaring unmentionables:

- ◆ Universe, Cosmos, earth, atom, molecule, atomic theory, periodic table, biochemistry, rare earths, carbon , silicon, material science,
- ◆ Darwin, Evolution, molecular biology, genetics.
- ◆ Inquisitive, spirit of enquiry, questioning attitude.

What is scientific temper without questioning ?

- ◆ geometry, algebra, mathematical sciences, mathematical physics,
- ◆ Long on catch words, but short on content – for example 27 mentions of the word 'ecosystem', but no mention of 'ecology', except one in the context of ancient India.

The disconnect in the document from its vision objective of 'sustainability' is apparent from the following omissions:

- biodiversity, forests, biomass.
- carbon, carbon dioxide, carbon footprint,

- 'pollution'.
- global warming,
- resource depletion, non renewable resources, renewable resources, degradation, environmental degradation,
- hydrocarbons, fossil fuels, fuels,
- mentions of preservation of language and culture, but no preservation of the environment.
- waste, waste management, waste reprocessing, recycling,
- renewable energy , solar energy , are each mentioned just once.

5. More unmentionables

The Cultural and Ideological blinkered vision of DNEP 2019

An ideological thrust of the DNEP is starkly clear in its following unmentionables :

- ❖ Directive Principles, Preamble of Constitution,
- ❖ Secular, secularism, republic, freedom struggle, freedom movement,
- ❖ Nehru, Subhash Bose, Maulana Azad, Bhagat Singh, Mahatma Jotiba Phule, Savitri Phule, Shahu Maharaj, Sayaji Rao Gaekwad , B.G. Tilak, Ranade, Gokhale, Vidyasagar,
- ❖ Mahatma Gandhi is mentioned once
- ❖ Mention of Chandragupta Maurya, but no mention of Ashoka.
- ❖ Shivaji, Akbar, Jai Singh,
- ❖ Thiruvalluvar, Tukaram, Dnyaneshwar, Basavanna, Sree Narayan Guru.
- ❖ 'sarva dharma sambhaava', 'composite culture', 'humanism',

❖ **Dravidian, Sino-Tibetan, Austro-Asian, Indo-Aryan, migration, 'peopling of India', multicultural, multireligious,**

There are however, 18 mentions of multilingualism. In the name of 'multilingualism', there are 23 mentions of Sanskrit, 12-Hindi, 5-Tamil, 3- Kannada, 3- Odia, 2-Malayalam, 2-Telugu, 2- Urdu, Among the unmentionable languages are Bengali, Marathi, Gujarati, Punjabi , Konkani, Kashmiri, Nepali, Assamese, Manipuri, KokBorok, Khasi, Santhali, Mundari and all the other languages of the Eighth Schedule of the Indian Constitution.

English is mentioned 24 times. It is singled out as being the language of the economic elite in India, whose use *"has resulted in the marginalisation of large sections of society based on language..... This attitude has kept the elite class and the jobs they control segregated from the economically weaker sections of society, which of course contain many hardworking, smart, high quality, highly skilled, and educated people who happen not to speak the language of the colonists and current elite.*

For true equity and inclusion in society, and in the education and employment systems across the country, this power structure of language must be stopped at the earliest. A major effort in this direction must be taken by the elite and the educated to make increased use of languages native to India, and give these languages the space and respect that they deserve ... An importance and prominence must be returned to Indian languages that has been lost in recent years."

How serious is the intention of the present government to include everyone in the discussion on the New Education policy is evident in the fact that DNEP 2019 has been published only in English and Hindi.

Though there are a few welcome recommendations and aspects, like those for ECCE, upgrading the Mid-day meal scheme, and a section on Scientific temper, the bulk of the DNEP is just a shabby political document.

At present the BJP is in power in just 11 states- four in the North East, two hill states (HP, Uttarakhand), and Jharkhand, Haryana, Maharashtra, Gujarat and UP. The curtailment of the rights and powers of the states proposed by DNEP 2019 is unlikely to be accepted by the remaining state governments in the country.

The flaws in the DNEP are so fundamental and basic, that the document cannot be rectified by redrafting. It should be withdrawn in the interests of Indian education.

After withdrawing the DNEP 2019, there need not be a long wait till another draft policy is produced. The unfinished tasks and the quality mandate of the RTE 2009 and NCF 2005 can well be taken forward on the basis of the excellent comprehensive SSA Quality Framework document 'Framework for Implementation', published by the MHRD in 2011, which is still available on the MHRD website and also at www.navnirmitlearning.org.

5.

Draft National Education Policy Pushes Centralising Agenda, Short Changes Poor Students

The draft describes a ‘severe learning crisis’ but hides behind words such as ‘flexible’ and ‘fun’.

- Anita Rampal

EDUCATION

A draft National Education Policy coming out decades after the second National Policy on Education was promulgated in 1986 and distilled through five years of several draft panels and national consultations naturally carries expectations. However, the 2019 draft seems to only air some loud and naive thinking, some well-intentioned but unsubstantiated ideas and some smartly crafted statements on contentious intended action.

The draft’s eponymous chapter on ‘foundational literacy and numeracy’ describes a severe “learning crisis” and warns that the country could lose “10 crore or more students — the size of a large country — from the learning system”. It then goes on to resolve that this cannot be allowed to happen. “The cost is far too great— to crores of individuals and to the nation. Attaining foundational literacy and numeracy for all children must become an immediate *national mission*,” it notes.

It then goes on to state, almost tautologically, that the reason behind this is a “lack of school preparedness”, a problem which the draft says acutely ‘afflicts’ children from

disadvantaged socio-economic backgrounds without access to pre-primary education.

Hiding behind terms like ‘fun’

It asserts that early grade schooling does not lay emphasis on reading, writing and speaking or on mathematical ideas and thinking, but moves quickly on to rote learning. In actual fact, ‘rote’ learning frames all of schooling, its expectations, syllabi, texts, teaching and assessment at all levels, as has been recognised and discussed by all the earlier policies. So how does this policy acknowledge, understand or face that systemic challenge? It does not, but continues with “If and when rote learning is used, it will always be pre-accompanied by context and motivation and post accompanied by analysis and discussion” (p. 76).

Moreover, it adds, “If students are given a *solid foundation* in reading, writing, speaking, counting, arithmetic, mathematical and logical thinking, problem-solving...then all other future lifelong learning will become...more enjoyable.”

Enumerating counting, arithmetic and mathematical thinking as different elements of foundational numeracy indicates a lay understanding of ‘learning’ that runs through the document, often hiding behind the repeated use of terms such as ‘flexible’ and ‘fun’.

In Curriculum and Pedagogy (chapter four), we get a dream menu of permutations and combinations of this ‘fun’. From ‘interactive fun classrooms’ (p. 76), to language teaching in a ‘fun and interactive style’ (p. 85) as done by Samskrita Bharati and Alliance Française, for Sanskrit and French (but probably not for those in their early years).

Contrary to theories of learning, it recommends harnessing the “extremely flexible capacity” (p. 79) of young students, from pre-school onwards, who would be “exposed to three or more languages with the aim of developing speaking

proficiency and interaction, and the ability to recognise scripts and read basic texts, in all three languages by Grade 3” (p. 81). It also states that during grades six to eight every student will take a ‘fun course’ (p. 86) on the languages of India. Multilingualism and an understanding of diversity are important aims but not done in such an ad-hoc manner.

It adds that puzzles or competitions to write on a topic without a given sound/alphabet can offer a “*fun* way to understand and play with language” (p. 93).

Incidentally, such ideas have been used in NCERT language or mathematics textbooks, but not as arbitrarily and definitely not for ‘fun’, as they seem to be listed in the policy.

Lack of focus on how students will imbibe skills

A crucial theme on integrating work and education, not for a vocation but as a medium of learning from life and for life, which has been implemented by the Zakir Hussain Committee (1938), has not been seriously discussed at all. The draft claims that “exposure to practical vocational-style training is always fun for young students” (p. 94) and recommends, without any modalities, that every student will take a fun year-long course on a survey of vocational skills and crafts, sometime between grades six and eight, with some hands-on experience of carpentry, electric work, gardening, pottery, and so on.

It states that the National Curriculum Framework of 2005 has given excellent strategies for “accomplishing a more constructivist type of learning” (p. 101). Indeed, this is still relevant, but the draft gives no understanding of how the “shrinking of the curriculum content to its core” (p. 102) will be achieved or what the ‘core’ implies.

High dependence on technology, industry funding

Meanwhile, the list on Constitutional values includes, among other things, equality, justice, plurality, scientific temper, and a 'true rootedness and pride in India'. The last phrase looks new, while secular values are conspicuously absent (p. 96).

The draft's highly centralising agenda also comes to the fore. Both the government-controlled Rashtriya Shiksha Ayog and the well-funded National Research Foundation, with links with the industry to "ensure that most urgent national issues are researched" merit discussion.

Attempts to control and dictate research topics through the government's wishlist have been made earlier but with an influx of funds, this can have crippling consequences.

Similarly, high dependence on technology through the National Educational Technology Forum, for all kinds of 'adaptive' assessments which obscure the agency and autonomy of teachers, and the National Repository of Educational Data which will house digital records of all institutions, teachers and students is a contentious proposition triggering due concerns on data privacy.

A highly contentious recommendation in chapter three proposes school 'rationalisation or consolidation' through the set up of 'school complexes'. This would be done through mergers and by closing down 'unsustainable' small schools, something which has long since been targeted by corporate NGOs and funding agencies. Many states under pressure from Niti Ayog have already closed thousands of schools; this policy's claims of ensuring access through buses, paid walking escorts or rickshaws to parents, are not practical or realistic.

Right to Education curtailed

The most brazen attack is on the Right to Education Act, which while being proposed to be extended has been hugely curtailed with. Its most basic requirements like the quality of provision, qualification of teachers, and so on will be removed, “to allow alternative models of education such as *gurukulas*, *paathshaalas*, *madradas*, and home schooling” to flourish.

A ‘flexible’ market model with minimal regulations, to give “greater *flexibility* (and) create greater educational *choices* for students and healthy *competition* among schools” (p. 71), is sought to transform the nature of school education. The euphemism of multiple ‘alternate models’, helps to also include the huge industry of low-cost private schools, ‘philanthropic-public partnership’ schools, religious schools, and the largest network of Rashtriya Swayamsevak Sangh schools, including its single-teacher Ekal Vidyalayas in predominantly tribal regions, for which “multiple pathways to learning” (p. 69) through non-formal methods, technologies and National Institute of Open Schooling courses (equivalent to grades three, five and eight) are being justified.

These models are violative of the fundamental right of children to good quality education in regular schools; removing Right to Education regulations amounts to depriving the poor and disadvantaged of their most basic entitlements.

Moreover, the draft policy makes mockery of the rights of under represented groups through its National Programme of Tutors (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).

Contrary to known theories of learning and experience in India, it still advocates for ‘each-one-teach-one’, for schools and also for adult education.

Poor students cheated of quality education

Another brazen agenda to short shrift the poor, who need nurturing attention from qualified teachers, is the Remedial Instructional Aides Programme (RIAP). The term 'remedial' is demeaning and demotivating, indicating a deficit or illness in need of a remedy, and the Ministry of Human Resource Development had stopped using it soon after enacting the Right to Education. Initially, RIAP has been presented as a 10-year project to employ instructional aides — especially women from socio-economically disadvantaged communities (who have completed the highest grade in school available in their region) — to hold such classes during and after school, and during the summer.

The draft says 'true local heroes' will be trained to teach foundational literacy and numeracy, to bring back students who might drop out, not attend, or never catch up. Glorifying deprofessionalisation in education is being used by different governments for their own agendas.

Foundational learning offers a new garb to segregate the disenfranchised into ghettos of low cost, minimalist skill programmes, while allowing unqualified unregulated 'heroes' to be 'employed' and to influence the agenda of schools.

Ironically, qualified teachers, who are not available for these children, are expected to consistently monitor their learning, and also this army of volunteers, peer tutors, and instructional aides.

Anita Rampal retired from the Faculty of Education, Delhi University. Courtesy: WIRE

6.

Professional Education in India Problems and Prospects of Transformation

- **Dinesh Abrol**

Introduction

This article examines the crisis of professional education emanating from the failure to incorporate public purpose in to degree and diploma programmes offered by the private sector educational institutions in India. It argues that the proposals on professional education by the Draft National Education Policy (DNEP), 2019 cannot ensure the activities of knowledge production and utilization to get started with the interdisciplinary and transdisciplinary programmes and courses of professional education for the domains like integrated development of urban planning, water and sanitation, energy, mobility, industrial symbiosis, built environment, medical devices, healthcare equipment, biological agriculture, additive engineering, industry 4.0, Artificial intelligence (AI) based local industry and service sector and so on in the private sector educational institutions with the conditions of extreme privatization in place. The pathways of de-privatization will have to start with giving the students access to the programmes and courses incorporating greater public purpose, ensuring directed state funding for the recruitment of competent faculty, free admissions, fellowships and scholarships and providing for greater social control over the managements to the faculty, students, users and public interest groups working in the proximity of private sector professional education institutions.

Nature and source of crisis

The post-80s decades were characterized by the mushrooming of second-grade institutions offering self-financed courses of professional education. India saw a drastic decline in the state funding for publicly funded higher education courses. Private institutions filled the gap. The Indian state was experiencing campus unrest to which the political response made the country to shift to private education. Massification of professional education was seen as a solution to student unrest. This response did help the ruling classes to diffuse the student protests building at that time around the demand for better paying jobs. Student protests were for the democratization of education through the implementation of demands for participation of elected student and faculty representatives in governance, job-oriented education and better paying jobs. The Indian state was shifting to the pathways of liberalization, greater role for private sector in economy and education and globalization of the economy. In these conditions, private higher professional education became in a way also the vehicle for stabilizing the shift to neo-liberal political governance for the Indian state. Private higher professional education helped the ruling classes to serve quite well initially the immediate demand from the information technology enabled services (ITES) sector. Private sector educational institutions began to be seen as a systemic solution to the failures being experienced by the Indian state which has chosen to make a shift from the path of dirigisme to neo-liberalism to continue with the agenda of ruling classes and the middle classes in an underdeveloped capitalist country¹.

The second-grade institutions of professional education providing self-financed courses added to their list not only the programmes of information technology and management but also the programmes of electronics, electrical and

mechanical engineering to meet the needs of the local private sector industry undertaking capital accumulation using foreign collaborations with very little effort for the absorption of imported technology. All of this helped the private capital to meet the demand emerging from the services sector and the manufacturing sector requiring engineers capable of undertaking the functions of assembly, marketing and aftersales service. This arrangement worked well for almost a decade and half for the Indian capitalism. Of course, the collateral damage was that the manufacturing sector also failed in getting the engineers required for the activities of production, investment, research and development and innovation. The cookie began to rapidly crumble after the mid-nineties with the falling rate of growth of placements; the rapidly growing engineering graduate surplus was officially taken note of in the U R Rao committee appointed by the Government of India in the year 2003.

Professional education in India, includes a wide range of degree and diploma programmes in agriculture, medicine, technical education covering courses in engineering, technology, management, architecture, town planning, pharmacy, hotel management and catering technology. Currently the private educational institutions account for over four fifths of the seats of professional education programmes. It is also a significant fact that the private investment in professional educational institutions has been growing as for-profit investment with the support of a class of politicians of ruling class parties to which the legitimacy was provided by the upper stratum of middle classes to get trained in information technology and other types of marketable engineering courses during the early period of economic reforms in India.

Private investment started the career with a robust demand environment during the 80s. When the conditions for private

investment were still conducive these institutions did not make the investment of required quality of faculty and infrastructure. The processes of extreme privatization ultimately ended up creating a crisis of purpose, financing, quality and governance. Credibility of private education has touched the rock bottom. Many institutions are unable to continue education in a meaningful manner. Professional education is not-for-profit only in theory. It is in practice fully for profit for suppliers and consumers of professional education programmes. Professional education is seen as investment producing “employment ready graduates” for industry not capable of producing, making and creating in India.

Professional education is merely a vehicle for the expansion of marketing and servicing of semi-knocked down (SKD) kits, imported intermediates, components and products in the private sector industry, be of foreign or local origin, undertaking low value added local production activities. Professional education has not been geared to building the national innovation system. India is unable to carry out locally the activities of production, engineering and design and research and development. Unfortunately, the new generation of graduates today cannot meet their aspiration of dream jobs and feel cheated by the system of economy and education under development.

Currently the private sector institutions face an acute crisis of demand for the standard programmes and courses of engineering and management offered by them to the mass of students. Empty seats, ghost campuses and unemployable graduates describe the crisis of private sector professional education. As this crisis has been building up due to the decline in demand for the courses of second grade institutions, there was the need on the part of providers and consumers to shift to the programmes of emerging areas of interdisciplinary and transdisciplinary professional education.

But since the bubble for private investment in courses of standard disciplinary variety has now burst with the job market becoming extremely tight for the seats of the for-profit private sector institutions many institutions have no option and they are closing their shops. Investment is unsustainable; private sector institutions have failed to adjust to the demand for from the mass of students. Professional education has been a business not only for the suppliers but also for the consumers. Professional education is provided as a highly differentiated product in the market. Neither the cost and quality are determined through perfect competition nor the suppliers and consumers of degrees and diplomas have the ways and means to reduce uncertainty and control the effects and consequences of the choices made by them at some point of time. Professional education programmes are today subject to almost all the possible conceivable processes of extreme privatization. Capitation fees are common. Commercialization is rampant.

Engineering and technology, agriculture, pharmacy and management, almost all of these programmes and courses are now reported to be suffering from the problems of overcapacity, shortage of faculty, poor quality of faculty and weak pedagogy. At least the crisis of engineering education is visible. The crisis is being experienced in the erosion of public purpose, mismatch between supply and demand, lack of equity, uneven regional distribution, faculty shortage, poor curriculum and quality of pedagogy, inadequate infrastructure and underequipped labs and so on. Engineering programmes are producing unemployable graduates. The low enrolment, lower placements, and low employability are a big cause for concern for the new generation of students of professional education. Currently more than fifty per cent of the seats in engineering programmes have no takers. The state of affairs is one of deepening crisis; the cost of crisis is underestimated

for the students coming from weaker sections. Many private colleges are either on the verge of closure or have closed the engineering programmes. Currently they are getting attracted to pharmacy. Private investment is shifting to pharmacy education. However, there are also similar types of problems existing in the pharmacy programmes. Rapid commercialization of professional education institutions is reflected in the rising costs of fees and loans. As a great majority of the technical education seats are in private sector institutions (80 % of engineering, medicine & management), this development has inherently weakened the right to higher education as a public good. Extreme privatization excludes majority of poor who do not have the equal opportunity and the required financial means to enter into professional education.

The report of Times of India (Mumbai Edition) of 25 May 2013 brings out the failure quite well when it takes note of how the AICTE approved 11 new colleges even though the state government had warned it that nearly 1.44 lakh engineering, management and architecture seats were lying vacant. Even in 2013 vacancies were reported across the fields and included automobile branch, followed by electrical branch, information technology (IT) and biomedical, computer engineering, civil engineering, electronics, and so on in 2013 in a state like Maharashtra. In 2018, the Hindu Business line also reports the conversation taking place between a bureaucrat and a senior politician of Tamil Nadu on the problem and challenge of private investment. A senior politician is reported to be telling a bureaucrat that “Let somebody simply run the engineering college and service the debt. We can finalize the take-over after they break even. I cannot deal with it anymore. The bureaucrat advisor suggests it is better to wait for 2-3 years, and the politician shakes his head and suggests “Get a buyer”.

For the state of Tamil Nadu, the same report also states, the number of engineering colleges more than doubled to 584, from about 250 in 2003. At the start of the 2016-17 academic year, 1.27 lakh seats, nearly half the sanctioned number, were vacant. No student had been to 23 private colleges, including two teaching architecture. Just 14 colleges had filled their entire allocation of sanctioned seats. Twenty colleges had opted to close in Tamil Nadu in 2016-17. The starting salaries for teachers too had come down in the past five years as admissions had decreased. When you cut the pay and commercialize education, quality faculty will leave to find better jobs. Mediocre staff takes over is obviously the necessary outcome of a vicious cycle in place. It is no surprise that even fifteen years later, in Karnataka, one of the first few states to open the doors to private engineering colleges, there are reports in the local media that at least thirty-five (35) engineering colleges were forced to shut down this year seventy-five (75) courses. This is also the case with the other Southern states. Telangana, Andhra Pradesh, Tamil Nadu and Kerala are also reporting the closure of engineering courses. Private colleges were started in the eighties in the Southern states. Even in the states like Uttar Pradesh, Haryana and Madhya Pradesh where the private colleges got only started later closures have been experienced.

The report of Careers 360 of 22 August 2014 stated that of the 1.26 Lakh seats on offer in Uttar Pradesh, nearly 4/5th found no takers. 58 colleges could not fill a single seat. 187 engineering colleges of UP saw only 1% to 20% of total seats filled. Only 7 private engineering colleges which are from NCR could fill 100% of seats. In Haryana, Bhagwan Parshuram College of Engineering is reported to have given the workshop set up for mechanical engineering students to learn and practice lathe machining is the wrestling academy started Yogeshwar Dutt, the London Olympics bronze medalist. It is

to be noted that though a part of the college is now an akhada, has been renewing its AICTE approval every year in the hope that the interest in engineering will revive and its fortunes see a reversal. Even in 2019 the institute paid Rs. 3 lakhs to renew AICTE approval though it didn't admit any students. The report adds that if the AICTE shut us down, who will repay s for the investment made. The AICTE should take over these colleges, instead of shutting them down. Then they will know how difficult it is to run one.

According to All India Council of Technical Education (AICTE) campus placements have come down below 50%. The intake was around 75,000 annually. In 2016-17, total intake capacity at undergraduate level was 15, 71,220, of which total enrolment was 7, 87,127, which is just around 50.1 per cent. The latest 2019 decision of the AICTE was about scrapping 2.6 lakh engineering seats and approving an increase of approximately 24,000 seats in pharmacy. Number of engineering seats fell by 9.12% and medicine seats rose by 13.39%. The Indian Express analyzed the data of enrolment of the period between 2012-13 to 2016-17 (a report published on June 8, 2019). 70% of engineering seats were lying vacant. 128 institutes were closed during this very period. Maximum number of institutes that discontinued IT programme were from Telangana (157), Tamil Nadu (104) and Andhra Pradesh (128). Of the nearly 370 technical colleges that are experiencing low admissions, 153 are engineering colleges.

In the early 1980s, there were only about one hundred engineering colleges admitting around 25,000 students each year. The existing publicly funded educational institutions became insufficient to cater to the rising demand from the mass of students for professional education. There was also unrest building up among the students in the university campuses. During successive Five-Year Plans (FYPs) and particularly with the implementation of the policy of

liberalization and globalization the governments chose to allow and facilitate the private sector to set up technical institutions on self-financing basis. The process started with the opening up of about 50 new private engineering colleges in Tamil Nadu. This mushroom growth was opposed by the democratic movement at that time. Academic community feared that as this mushrooming would adversely impact on the standard of engineering education this path needs to be abandoned. Signs of the crisis becoming acute have been noted since the beginning of 2000s. The U R Rao committee formally took note of these developments. In the year of 2003, it several recommendations to fix the system. The Committee had suggested a five-year moratorium on all approvals for undergraduate technical institutions in states where the student intake exceeded the then national average of 150 seats per million. This figure was 1047 for the Southern States, 486 in the West, 131 in the east and 102 in the north. The recommendation of U R Rao Committee was never implemented. The reverse happened; the country actually witnessed an increase in seats.

Although the gross enrolment ratio (GER) increased from 5.9 % in 1990 to 21.1 % in 2012, but privatization of public funded institutions occurred on account of the adoption of cost-recovery measures due to the decline in public funding of higher education persisting for almost over a period of forty years. The next phase was establishment of private universities, between (2002-2011). 178 private universities were established in India. Over 140 of foreign such institutions face the issue of credibility due to their limited contribution and value of functions performed and interaction undertaken with the system of production. Expansion of private investment in education enabled by political and bureaucratic apparatus with full legitimacy provided from the side of media, big business, lack of conscious (creative) political activity among

students and faculty connects the dots of private investment in education to a vicious cycle where education becomes a commodity which incentivizes the rich not only to earn money but also to exclude from higher education the majority of poor people who also are educationally backward.

Today, India produces annually close to 1.5 million engineering students from around 3500 engineering institutions. The supply is unbalanced discipline wise; standard programmes are dished out. Emerging and new disciplines have little place in the system of private education. The quality of education in these private engineering colleges is poor. Many of these colleges lack even basic facilities essential for good engineering education and have practically no quality teachers at all. Deemed university status, institute of eminence status, and many other such labels have mushroomed with the full support of policymakers. A very few have excelled and can claim to have produced competent teachers on their own for the undergraduate through the integration of post graduate teaching and research. Most institutions do not belong to the same class as those recognized as such twenty years ago as either deemed universities or institutes of national importance by the central government. Earlier this provision was reserved for a few truly outstanding education and research institutions, with a consideration that they would bring depth and variety into the education system.

In agriculture and allied sectors, the state of affairs is no different. Over 1000 unregulated private agriculture colleges which have sprouted across the nation churning out degrees like street food. Many are without proper labs, infrastructure or farm land. After the adoption of the Punjab State Council for Agricultural Education Act 2018, came into the force last year, the notice issued a warning to students taking admission to BSc Agriculture. The notice read, "Students may take

admission in these institutions at their own risk and cost. 82 institutes out of 107 institutes failed to submit a status report with regards to admission, affiliation and curriculum. Five private universities, including Lovely Professional University, Shri Guru Granth Sahib World University, Chandigarh University and Sant Baba Bhag Singh University and 20 colleges figuring in the list of 25 institutes had submitted the report but were found to be not fulfilling the conditions of the Act.

Come to the field of medicine, India has the highest number of private medical colleges. India has approximately 300 medical colleges producing 30,000-35,000 graduates every year. Out of the 385 medical institutions in India in 2014, around two-thirds were established after 1990 and are largely in private sector. The regional spread of medical education is much skewed. The opening up of private hospitals has commercialized our medical education to a great extent. Students who are unable to secure seats in government medical colleges pay hefty fees and take admissions in private colleges. The quality of education in private colleges is not at par with the government ones. This is because the treatment in most private medical colleges is costly and the patient load is poor with bed occupancy less than 50%, depriving the medical students of the constant and continuous availability of patients for exam and learning skills.

Merit good, deregulation and elite and non-elite education

The structures of professional education system have been treating the delivery of higher education as a merit good. Private institutions have been recovering the full cost plus their own margin from the students or their parents. Poor quality courses of professional education supplied from the second-

grade institutions are mostly consumed by the non-elite mass. Professional education has been built as a highly segmented system of education in the country. If you leave aside a few, most of these institutions are only delivering paper degrees and diplomas rather than education. A large mass of students who take admission in these institutions does not come any more from the wealthy families. Many of them cannot afford “quality” school education or access to coaching institutions for their children. And their misery does not have much to do with the merit possessed or the quality of student. Their only fault is that they could not qualify the entrance exams that have been erected to create and maintain the elite of professionals as small as possible. The system of IITs, NITs, IIMs, NIPERs, IARI and SAUs, SPA and many other elite institutions have been serving this purpose. These entrance exams have been testing students to create the elites in their respective domains. These exams have been utilized by the system to socially exclude the mass from entering in to the elite institutions that continue to receive significant public funding from the central government.

India has created with open eyes a highly differentiated education system taking one step after another towards the system consciously embracing the conditions of extreme privatization. Policymakers have continued this way during the long period of forty years. In order to meet the rapidly growing demand for degrees and diplomas policymakers have maintained the system this way by design. Policymakers have allowed the for-profit institutions to function openly with impunity. Deregulation guarantees high returns from the private investment in making. The public sector of professional education has also embraced the path of self-financing. De-facto deregulation of private investment and the policy capture by the vested interests of private investors and the completely warped imagination of the middle class has contributed to the building of crisis of professional education.

Working conditions of the faculty of non-elite institutions have deteriorated due to increased teaching load. Decreased autonomy; financial pressures have contributed to ever-increasing demands of “accountability”, addition of several new functions; relations with industry, consultancy. Unrelenting criticism in media, it is very often bordering on virtual vilification of the academic profession as a whole. Changing nature of internal and external brain drain, Indian born scientists and engineers (S&E) top the list of foreign-born S&E in the US. Dependence on dependence, weakening of R&D and manufacturing and producer services have not been deliberated as systemic and structural outcomes of the reform process in the media. Supply of unemployables, expansion without equity and excellence, slowdown of the demand from global economy, have not triggered the policymakers to look at the systemic crisis of professional education.

Disenchantment with the credibility and purpose, lack of market demand and fulfillment of explicit and implicit role of professional education provide the entry points for intervention. The skill that forms one of the prominent outcomes of professional education is gradually becoming exclusionary in character whereby majority of citizens would not be able to access it. Furthermore, professionals who get technical education are more committed towards earning money than contributing to society and nations which usually manifests in brain drain to western countries. Professionals graduating exhibit an outward orientation and their linkages with the domestic industry and society are still low. The state of affairs of professional education is actually a huge failure of reforms that the society is yet to realize and accept.

While the advocates of reforms continue to view the crisis of private higher education institutions as essentially arising from over regulation, but actually the main source of crisis of the system of professional education lies in the cycle of

reproduction of the conditions of extreme privatization. This source needs to be hit and targeted directly, and need an immediate course correction from the side of the state, society and private capital by taking to the pathways capable of promoting the incorporation of public purpose in professional education. The policy discourse on professional education needs to change in favor of working out plans and policies that India requires to push to initiate the systematic perusal of de-privatization of public and private institutions providing professional education programmes and courses.

Draft National Education Policy, 2019

The Draft National Education Policy (DNEP, 2019) has ended up recommending a highly centralized framework of command and control for the promotion and regulation of private and public sector institutions. All entities would get effectively governed by the rules and norms of market coordination; DNEP, 2019 provides only for a semblance of partnership between the Centre and State governments. Even the academic community would have hardly any leeway to decide on the purpose and content of education. Little space would exist in such a framework of governance for the achievement of public policy goals. Philanthropy and private investment cannot be trusted to take care of the integration of national purpose and inefficiencies noticed in respect of the needs of the working classes (See AIPSN Feedback, 2019).

The DNEP, 2019 talks of the integration of public purpose by shifting the system of professional education in to multi-disciplinary university environment and abandoning the idea of specialized institutions. The committee is afraid of talking about how the crisis has emerged and persisted in the fields of professional education in agriculture, engineering and management, medicine and pharmacy. The real source of failure of the non-elite system to educate the professionals in

the ethic and importance of public purpose is not even acknowledged. It proposes to continue with the pathways of extreme privatization. No separate mechanisms have been framed for even those areas of educational demand that are linked to the strategic interest of the nation as a whole or to the collective problems of the specific regions that are not going to be served by the market. There is also the question of educational programmes whose aims are academic and for critical intellectual enquiry. No effective mechanism has been provided to the political leadership, academics or users for a conscious intervention to redress such failures (See AIPSN Feedback, 2019).

The DNEP, 2019 talks of the need to integrate the system of undergraduate professional education into higher education. It mentions the need for integrated education within professional disciplines through the integration of technical and vocational education and training and the provision of vocational education at all institutions offering professional education and the provision of vocational education during senior secondary school stage and multi-disciplinary education with multiple entry/exit points. With no analysis of how the supply and demand can be transformed by the as existing system to provide for these elements these suggestions appear as empty promises of the new government. At least the first budget and policy announcements of this government did not show any signs of course correction on the financing front.

The DNEP, 2019 states that professional education in India, in agriculture, healthcare, and technical education must seek to develop individuals with the capacity to combine the ability to connect theory to practice, develop an understanding of how their own profession has to contribute to the professional practice and act as an ethical compass and disposition on the practice of business, society and state. It

suggests the remedy of philanthropy as a private investment to be negotiated at the individual institutional level to deal with the problem of silos, shortage of faculty, isolated entities, limited choice, absence of interdisciplinary approach, outdated syllabus, lack of postgraduate education and research, non-existent experiential learning, deficient on vocational training (See AIPSN Feedback, 2019).

The DNEP, 2019 does not touch the private interests or the entrance exams which have been used to maintain the elite and non-elite divide in the Indian system of higher education. Centralized entrance exams will continue to test who will get in to elite and non-elite systems. The silos will also continue in practice. The policy permits the practice of deregulation of fees for professional courses to both public and private educational institutions. While the policy does talk of building a holistic approach with the help of philanthropy to education and getting the faculty and students to develop competencies for decision making, critical thinking, problem solving and user communication, but as the problems of professional education are connected to the promotion of structures of extreme privatization, the political will continue to eliminate the divides and bridge the gaps that exist in the case of professional programmes in India (See AIPSN Feedback, 2019).

Even the views of policymakers on the purpose of Tier I institutions that include IITs and IIMs which are capable of providing programmes of good quality engineering education is a good instance of the wider misrecognition as to what ails professional education. Let us not forget, even with adequate financial support (at a level that is ten times what is given elsewhere) and elite status, they have failed to serve the core processes of national development of industry and agriculture, transportation, energy and environment. Programmes for their contribution to the upgrading of non-elite educational

institutions have mostly remained on paper. Similarly, even while it is generally accepted that the neglect of research by their faculty has prevented these institutions from becoming world class, but not being able to integrate the mission of extension with their teaching and research is a big failure. The policy does not focus on the lack of connection of the graduates of these institutions with our economy and society. These important failures cannot be brushed aside with the defense that there are now more chief executive officers (CEOs) and startups coming out of IITs / IIMs (Dinesh Abrol, 2006, 2010).

The moot issue is how come such corporate enterprises are still marginal to tackling the problems facing the domestic economy with regard to building manufacturing and creating jobs. This is because these individuals are largely serving those businesses for which readymade markets exist due to the expansion in outsourcing opportunities. In spite of meagre financial support, it is the largely second rung publicly funded non-elite institutions that contributed more than IITs and IIMs to the departments of space, atomic energy, thermal and hydro power, private and public sector industrial units in India. Most students graduating from the elite institutions end up getting lucrative jobs from multinational corporations (MNCs) in India or abroad. The brain drain today occurs mostly in India within itself where the top students get jobs in finance and management. Most students who pursue post graduate degrees in engineering are those who tried and could not get such jobs or secure admission in foreign universities. The IITs and the NITs are not even under the purview of the regulatory bodies such as the UGC and AICTE. Of course, the command and control framework of regulatory institutions, unless replaced by the facilitating framework capable of undertaking planning of the schemes for handholding and co-creation (Dinesh Abrol, 2010).

The neo-liberal policy regime, which has generally favored reduced state funding to the non-elite sectors of higher education and the privatization of technical education, has done its greatest damage here. When the IT bubble burst, with the urgent need to fill the seats in engineering colleges, the regulatory bodies lowered the eligibility criteria for admission into engineering to bail out the private investment already made in engineering colleges by the powerful groups and communities. Presently, there are about 6432 engineering colleges and 3479 management institutions in India which together constitute majority of the higher educational institutions. Inability of the government to put in place proper checks and balances to ensure quality of education, profiteering motive of the institution, inability of the system to provide quality teachers, and attract good quality, have resulted in poor quality outturns (Source: AICTE-2016). Fortunately, until recently the job opportunities provided by the IT sector could easily absorb the surfeit of engineers. IT education is also in crisis (See NASSCOM reports).

Close to half our engineering and management and IT products are unemployable. India is producing only about 3000 engineering doctorates compared to 9000 in China and USA. This has resulted in engineering teachers being either post graduates, or in most cases, mere bachelor degree holders. It must be stated upfront that the policymakers did introduce schemes such as research promotion scheme to improve the state of research in the institutions regulated by AICTE. The B.E./B.Tech. students pursuing M. Tech./M.E. degree studies is about 4% which is lower than any other discipline. The Early Faculty Induction Scheme introduced stipend for students interested in becoming teachers to do M. Tech. did not even take off as these students with a degree from top notch colleges were able to gain highly paid jobs in big companies. The poor salary structure at their parent

institutions failed to attract them back. The lack of infrastructure in large number of engineering colleges has resulted in poor exposure to practical/laboratory work. It is apparent that the schemes launched by AICTE did not bear desired results. Engineering institutions continue to suffer from shortage of quality staff, inadequate physical infrastructure, and funds, rigid and outdated curriculum, poor quality of training, absence of R&D activity, and ineffective linkage with industry and public services providing agencies (Dinesh Abrol, 2006, 2010, AIPSN Feedback, 2019).

It should be recognized that the policies promoting the disease of commercialization and the merit good mindset cannot produce professional excellence or training students in the professional ethics. In fact, the case made for the continuation of IITs and IIMs and Tier I institutions in the DNEP, 2019 is reminiscent of Indian caste system. Autonomy of higher educational institutions is closely related to the issue of ownership. Where there is public ownership there are possibilities of practicing autonomy. If the leaders are able to provide the complementary conditions of participation of faculty and students in decision making bodies of the institutions. In the private space there is no possibility of practicing autonomy. If the institution is in private sector, more controls will be necessary. Innovations are even more difficult to introduce when education is naked commerce. This means that the private institutions will be second or third tier institutions forever. In India, accreditation becomes an occasion for inspection and fault-finding rather than facilitating achievement of individual aspiration or institutional missions and vision. Radical transformation of the system of financing, governance, accreditation and regulation is needed, the government, society, faculty, students and parents have a big role. Extreme privatization and centralization are certainly not the way forward.

DNEP 2019 and medical education

More than the 57% of the allopathic doctors engaged in practice do not have any medical qualification and just 18.8 per cent of qualified workers are working in rural areas. There has been a phenomenal growth of private medical education in India with its share increasing from 3.6 percent to 54.3% between 1950 till 2014. States from the southern region have an excess of medical colleges, while many states from the eastern and northern regions which also have poor health indicators face an acute shortage. This regional disparity results in poor health indicators in these States. 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 the integration of public purpose into medical education (Dinesh Abrol, et al., 2016).

Some of the key measures proposed in the draft national education policy 2019 - 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 deficit and create an unemployable surplus in areas already having an excess. Many private medical colleges are owned and managed by the politicians and businessmen without any medical background and are viewed as a business. These institutions charge huge capitation fee and dispense poor quality of education. There

are gross inequalities in the availability of health personnel at the sub-national level. Higher density of doctors in the southern and western states shows the link between production and availability of doctors. Rural-urban divide is another dimension of this divide. Density of doctors (per 10,000 populations) in urban areas is four times higher when compared to rural areas. Students from private medical institutions are more likely to end up working in urban areas, even though rural areas need them the most.

There is shortage of qualified doctors, teachers and training staff in most private medical institutions. Private colleges with larger intake of students are unable to provide adequate number of teachers and professionals because of which the quality is often compromised. Participation of doctors in research, training and other outreach activities is neglected which is evident from the fact that during 1990-1994, 20 per cent of medical colleges had not published a single paper. Commercialization of education in general and medical education in particular has deteriorated the quality of health services in India. 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 DNEP, 2019 has put its faith in the common national examination (NEET type) at multiple points. The common exit examination for the MBBS that will play a dual role as also the entrance examination for admission into postgraduate programs will be administered at the end of the fourth year of the MBBS. The policy suggests that students will get 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 the situation worse. The students would now run behind coaching centers in their pre-final and years trying to learn the art of cracking MCQs. 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. If these skills are not developed due to an emphasis on the MCQs, then even the time spent during internships cannot compensate.

Too much of pan-India objective examination will only pave 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. 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. 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 (See AIPSN Feedback, 2019).

DNEP 2019 and agricultural education

The DNEP, 2019 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 agroclimatic 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 and not ensure in any way integration of public purpose in to agricultural education which the Radhakrishnan Commission dreamt of and the Prof. S. K. Sinha, Director IARI and Vice President of Delhi Science Forum resurrected at the time of the 10th FYP formulation. Actually, what is needed is one, the strengthening of the component of basic sciences and two, getting the institutions of agricultural research and education to recognize the diversity of agriculture in India. If the DNEP, 2019 is allowed to go ahead with its proposed plan, it can even threaten self-sufficiency in food production (See AIPSN Feedback, 2019).

While the redesign of undergraduate education by the DNEP 2019 is necessary, 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. 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. 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 to deal with the current challenges of high external input responsive agriculture and of the diversity of farm situations prevailing in India. 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 agribusiness & management should aim to link research labs to small farms to attain high productivity, profitability and

nutritional security in small farms (See AIPSN Feedback, 2019).

Attempting integration of public purpose

The Higher Education Commission, called also by many as Radhakrishnan Commission (RC), was the first and last committee to discuss how the Indian nation should integrate the public purpose into higher education system through the implementation of appropriately chosen university designs and joint planning. It began by highlighting that, as reported by the 1941 census, about 85% of the population of India live in villages. It argued further that new, free beginnings were possible, unhampered by the colonial past, taking advantage of advances in world educational thought and practice. Because of the tendency of an old and dominant institution to impose itself on any new institution in a similar field, it is a matter of practical necessity that new universities aiming at extending educational opportunities to the great mass of rural India, by giving vitality and quality to rural life, should have their own independent design and programme (Dinesh Abrol, 2007).

The RC's proposal for the establishment of "rural universities" was guided by the understanding that the universities established by the colonial masters — besides some qualitative limitations — had only touched the fringes of the world's newest and most populous democracy. The way the RC addressed the issue of integration of national purpose into the design of rural universities is quite instructive. India was asked to decide on whether to aim at its largest sections, making villages prosperous, interesting and culturally rich places, with such a range of opportunity and adventure that young people would find more zest and interest, more cultural advantages, and more pioneering opportunities

there, than in the city; or whether to turn to centralized industries, with labour taking direction either from the state or from private corporations. It also noted that there should be no feeling of conflict between existing and new types of (rural) universities, any more than between engineering and medical education. (Dinesh Abrol, 2007).

It suggested that because the pattern and spirit of existing universities is so distinctly urban centric, enormous and pioneering efforts would be required for evolving new institutions of higher learning which would answer to the needs and aspirations of our democracy. It stressed that rural universities will have to share many of the qualities and methods of existing universities, and, further, that there will be general co-operation and interaction, with the European university, with offspring institutions in India and America, whose services should be those of consultation, friendship and advice, but not of authority and direction. The RC's rural university had aimed at the integration of teaching and research and made the functions of teaching, research and extension subordinate to the requirements of the selected pathway of development. Extension was not a spillover to be harnessed. Knowledge (re)production would perform by contributing to the goals of rural-urban development "Indian style" (Dinesh Abrol, 2007).

Similarly, when the Commission recommended the formation of "City Universities" it recognized that rural and urban universities should supplement each other through a framework of regional development. It argued that universities so far had been established to meet the needs of cities or limited areas. Thought needed to be given to the formation of regional universities to serve the distinct requirements of diverse natural, linguistic, cultural or economic regions. The

RC was clear that the full genius of a country develops only with freedom to create variety. Foreign control could best advance itself by regimented uniformity. Something new and different would threaten such control, and was therefore looked at with suspicion. Part bureaucratic unimaginativeness, and part administrative convenience, whereby a foreign ruler could rule with a small administrative staff, regimented authority has become a habit of mind in Indian higher education (Dinesh Abrol, 2007).

The RC recommended that when the UGC decides the degree of recognition and support to be given to any institution, the criteria should not be the likeness of that institution to others of a standard type, but a judgment of whether that institution is making a substantial contribution to the economic, intellectual, cultural and spiritual life of India. For this to happen, however, a disruption of the “natural drift” through definite governmental and educational policy and a change of public attitude are required. But the policy drift continued. The authority and direction of agricultural universities were handed over to teams led by the Rockefeller and Ford Foundations supported by the two Agreements signed for Indo-American S&T cooperation in 1955 and 1960, which, unsurprisingly, completely violated the rural university design model proposed by the Commission.

Higher education in India is shaped by conflicting ideas about the scope and purpose of higher education and also the normative role of state in promoting higher education, influence of political processes and social process in promoting higher education. Higher education system should not be at the mercy of the market forces and the elites embedded in the social fabric of the Indian middle classes. Across domains society needs to be mobilized to redefine

and integrate the public purpose of professional education. Elite and non-elite institutions need to pull together the efforts to leverage their own respective local advantages-organizational as well as eco-system specific access to resources, capabilities and markets to create the proposed transformative spaces, meet the aspirations, expectations of students and parents, employers and faculties and help the political leadership to govern the system of technical education for the restoration of public purpose, academic freedom and creativity. of autonomy and accountability in both the sectors-public and private (See for details the point developed in Dinesh Abrol, 2010, 2011).

Significant changes have taken place in the conditions of reproduction of the three missions in all the fields of professional education. Engineering, agriculture and medicine, pharmacy, architecture, town planning, all of these domains need to redefine the contents and pedagogy. Explicit role of the system of professional education in the process of social change & development and in the production of professionals, intelligentsia, highly skilled labour & research output needs to be revisited to meet the perceived needs of extension and outreach in the country. Crisis of productivity and sustainability, jobs and incomes for the educated youth and the deterioration in the quality of livelihoods of rural and urban poor require that the pathways of development should be re-envisioned, better planned, coordinated and governed with an open mindset and deliberated in a democratic manner inside and outside the universities. Changes in the conditions for the fulfilment of the implicit role of the system of higher technical education and middle level of technical education in the building of new values, institutions of public sphere, elite training & socialization to tackle skill building, social differentiation, class mobility. The emerging challenges

arising out of the need to revitalize professional education in agriculture, manufacturing, medicine and education.

There are distinct challenges facing the elite as well as non-elite institutions. In order to provide for the access to and reproduction of excellence and relevance with the help of those sections who have the capacity to contribute to the development of productive forces namely artisans, peasants and laboring sections as a whole both of them need to come together to use their complementary assets. This important pathway can save the future of professional education as a whole in a holistic way. The need to bring them together needs the help of democratic movements of the faculty, students and people in India. The agenda of freedom movement promoted such an open mind in the 1930s and 40s. Although it is very much possible to leverage today also and combine the relative advantages of elite and non-elite institutions for the larger purpose of self-reliant industrial and agricultural development, but this cannot be attempted without involving the democratic movement. Development of infrastructure is not the complete story of development. The meaning of development includes ecological, economic and social justice. The challenge lies in bringing together the faculty and students of elite and non-elite institutions to deal with the erosion of public purpose.

Elite and non-elite institutions will have to redefine the meaning of access and equity. They will have to join hands for the creation of new advantage (s) for the people of a voluntarily brought together multinational Indian nation state where the Central Government and State Governments are facilitators and hand holders rather than controllers. This vision can materialize through the integration of their differential yet complementary access to knowledge creating assets provided by them through the state aid being directed towards

the goal of formation of dispersed, networked and decentralized development paths to industry and agriculture and services of the states in place specific, resource and context specific ways at the local, state, regional and national levels.

Due to the lack of integration between funding and national purpose that HEIs face an acute crisis of credibility today with the society due to the failure to practice transdisciplinary education. The problem of growing wastage of students graduating from the system of technical education is impacting on the credibility of India's higher education and vocational education institutions. Wastage in higher education is a growing problem, both public and private colleges and departments of state universities which offer standard degree programmes to the largest proportion of students across the entire range of faculties of engineering, science, social science, arts and humanities are turning out "ill prepared" unproductive graduates. Extreme privatization has led to the shrinkage of public purpose, rising incidence of uneven quality, decreasing public funding, concerns about autonomy, growing dependence on short-term funding, declining space for societal engagement and attacks on critical thinking, academic freedom and participation of faculty and students in governance of higher education in India. Policymaking for professional education needs to use an alternate approach to de-privatization and the creation of value (purpose), functions and interaction in the case of elite and non-elite institutions of professional education.

Transforming project needs a democratic politics. An alternate framework for the planning and governance of professional education will have to come from within the womb of the democratic movements active in the country to fight for ecological, economic and social justice.

Transformational processes need to be re-envisioned with the aim of integrating a sense of national purpose in an organic way in to all types of existing higher education institutions (HEIs). It is possible to seek many joint contributions from the elite as well as non-elite institutions by duly involving them in the building of mechanisms of value co-creation for the development of such paths locally without overseas investment. Non-elite institutions of public and private origin need to be saved from the curse of commercialization of higher education. Policymakers can get much help from these institutions to upgrade the national science, technology and innovation (STI) system.

The agenda of systemic transformation of professional education needs to be approached as a project of joint planning between Central government, state governments, faculty, students and society. The process of joint planning will have to be attempted with a facilitating rather than commanding and controlling framework. It will have to be implemented in a transparent, open, decentralized / distributed way with a democratic mindset. Joint contributions to the processes of knowledge production, diffusion and utilization from the elite and non-elite institutions can be planned much better at the state and district level. If the state funding is ready to seed the initiatives, their existing strengths can be mobilized to provide context specific solutions for the benefit of agriculture, rural industrialization, urban sustainability, healthcare, and upgrading of public health and education. It is possible to deal with the contemporary challenges of sustainable development of livelihoods and jobs and dovetail the plans of ecological, industrial and technological development in the case of organized as well as unorganized sectors through the introduction of multi-level planning.

With the current policymakers washing their own hands and trying to escape the social and political responsibility of undertaking the necessary correctives it is well apparent that the social responsibility of initiating the processes of transformation has fallen on the dissenting voices. The democratic movements have been weak in the domain of professional education. Although the seeds of weakening of dissenting voices on the problems and challenges of higher technical education are connected to the structure and ideology of the hierarchical and segmented system of professional education, but there is also contribution from the socially neutral imaginaries of scientific and technological knowledge and the vested interests of elites dominating the system of education who wish to maintain the status quo.

The voids and weaknesses of Indian system of technical education should not deter the democratic movements of the country to collaborate and experiment with the aim of regenerating and putting these institutions once again in the search of pathways to transformations. Policymakers should be compelled to define the performance indicators in the case of non-elite and elite institutions in such ways that they do join hands for the realization of public purpose, autonomy from market, academic freedom and creativity by getting started with value co-creation to undertake real world experimentation for the joint transformation of elite and non-elite institutions. This demands that these institutions are developed as transdisciplinary institutions and mobilized to strive for the establishment of collaborative mechanisms among themselves and with the potential users to be identified by them in their own zones of competence with the aim to contribute to the activities of societal engagement in a systemic manner.

Facilitated under the framework of joint planning of education, research and outreach with the help of not only the government but also the democratic movements, the process can be started in a state or at the all India level by the governments to frame a new set of initiatives embedded in the programmes of five to ten year duration to undertake the challenges of integrated development of urban planning, water and sanitation, energy, mobility, industrial symbiosis, built environment, medical devices, healthcare equipment, biological agriculture, additive engineering, industry 4.0, Artificial intelligence (AI) based local industry and service sector and so on. The grand societal challenges can be tackled only by launching the programmes capable of integrating education, research and outreach missions for place specific expansion of sustainable development programmes. Five years of compulsory public service can be assured to the graduates, post-graduate and above being turned out from the institutions of professional education as a part of such programmes with the total funding coming from the pool of funds obtainable from the central, state and local governments and the organized industry and service sectors as a societal obligation of the employers as their contribution to the solving the place specific problems of development.

The processes of de-privatization cannot get started with the help of philanthropy. Long-term patient state funding is necessary. De-privatization should get started with the infusion of public funding for improving the access of non-elite institutions and their faculty and students to elite institutions. Policymakers need to bring together the elite and non-elite institutions to join hands to deal with the faculty shortage with the help of state funding and not philanthropy. Transformative spaces would have to be formed to mobilize the public administration to build the mechanisms for innovation

financing, incubating social entrepreneurship and hand holding of the faculty and students in non-elite institutions. Pathways to transformation of the teaching, research and outreach functions lie in the development of local, regional and national economies as systems in themselves. Since the transformative spaces for value co-creation would have to be constituted with the aim to overcome the emergent divide by reconnecting the students and parents with the users of knowledge in our own society (Dinesh Abrol, 2010, 2011).

Resources for experimentation by the faculties and administrators of institutions of professional education should also be available to the movements of teachers, students, trade unions, farmers unions, industry organizations and professional associations. The democratic movements should also compel the policymakers to abandon the idea of National Research Foundation as an entity to be run from the office of Prime Minister. Public funds for postgraduate education and research need to be allocated in a proportional way to provide for the participation of diverse groups and regions in the initiation of experimentation within the institutions of professional education (Dinesh Abrol, 2010, 2011). Efforts must start from the side of the Central and State governments to get the non-elite institutions to alter the conditions of extreme privatization of purpose by targeting the formation of transformative spaces within professional education institutions. Exemplars created in the Tier I institutions can also help in a big way because they have financial as well as human resources.

An “alternate governance framework” would have to clearly ensure that the activities of higher education are not geared to providing merely the competencies that the middle classes have a preference for. It should ensure at the level of

integration of purpose all those activities to be also taken up in institutions of higher education which can develop the competencies of all its citizens (peasants, artisans, rural labour, small businesses, patients and ordinary people). In policy making bodies there will have to an active participation of societal forces with diverse ideological orientations working along with the various constituents of the academic community in a systematic manner. Even the principle of social control needs to have a meaning beyond the achievement of social justice in the form of affirmative action

Even the limited experience of TRCSS, JNU, PSMs and many other such experiments being undertaken by the innovative communities in the domain of education. Three idiots film brought home this message from Ladakh where at the school level experiment had been in making. It shows that trans-disciplinary innovation clusters can be created anywhere and everywhere. It is possible to jointly find solutions to the renewal of public purpose, building of quality and credibility of degrees, increasing the share of public funding, upgrading the autonomy and accountability and renewing the sources of societal engagement with the problems of national, regional and local development. The mechanisms of multi-level decentralized planning can play an important role in the creation of educational programmes for the benefit of subaltern classes; they would allow the working people to organize themselves better for emulation as well as competition with globalized big business (Dinesh Abrol, 1997, 2005, 2008).

The alternate governance framework would have to consciously pave the way for the creation of university designs that cater to the construction of new pathways of development to avoid the recurrence of mismatches and gaps. The World Class Universities (WCUs) will not come out of slavish

imitation of the institutions evolving elsewhere in their own respective context specific situations The Indian system of higher education should be providing the country with knowledge and skill for sustainable livelihoods and the systemic development of local economies. Experience tells us that global market forces prefer to foster uniformity in higher education institutions (HEIs) and homogenize cultures. Achievements of ecological sustainability and social justice are not only a matter of implementing affirmative action and picking up some readymade green technologies from the market. Distinct pathways of sustainability have to be constructed; then only will the enterprises and occupations of the deprived be able to contribute to the achievement of ecological and social justice (Dinesh Abrol, 1997, 2005, 2006, 2007, 2011, 2012, 2013, 2014, 2017a, 2017b).

Concluding remarks

While framing the alternate governance framework, it would have to be recognized that the country urgently needs to deliver the competencies for publicly valued knowledge based services of natural resource management, technological upgrading of unorganized industries, development of technological infrastructure for area based development, development of education for meeting the needs of SMEs, development and maintenance of civic infrastructure and services for appropriate water, energy and transport management, environmental protection, sustainable development of habitat (housing, public space, recreation, slum transformation for better quality of life and livelihoods for urban poor), pre-school education, public provisioning for crèches and delivery of childcare, integrated systems of medicine and healthcare, continuing education, development of elementary education, planning of socio-economic

development, promotion of democratic culture, cultivation of local arts, social regulation of citizen rights and duties and so on.

As far as the mechanisms of steering, planning, funding and evaluation of departments or disciplines covering the academic fields of sciences, engineering, social sciences, arts & humanities are concerned, diverse, decentralized and dispersed arrangements are a better solution. Therefore, the democratic movements need to explore and propose a new set of arrangements for the development of centers of excellence in education and research for the benefit of areas of social demand / demand of other classes which the established disciplines / specialties are able to ignore and which require to be finalized in consultation with user groups. All these new arrangements of joint planning should be made operational through the establishment of state level councils of higher education and research. State level councils can also be made to support the incubation of (state level and local area—district / cluster of districts level) user groups for the planning and implementation of such innovations in educational programmes. Policymakers should be made to form a new set of sector wide councils for the development of decentralized processes of planning and funding of research and education to meet the unmet social demand in education, health, food and agriculture, rural industries, habitat development, information and communication, natural resources, environmental protection. In this way the governance framework would be doing a better job for the classes whose interests we wish to advance in an accelerated way.

An alternate governance framework would need the enabling instruments to ensure the participation of the larger

democratic movement in the development of education in their neighborhoods in a framework of politically democratic and socially inspiring cooperation. The principle of social control needs to be taken forward. So far, we have the experience of setting up elite public universities as self-organized bodies. Academic activity should also be accountable to the people by partnering suitably with relevant user groups. Needless to state, each and every educational programme would have to come up to the prescribed standards of integrated scholarship. Some of the trade unions, developmental NGOs, people science movements (PSMs) have teams that are better motivated to incubate innovative educational programmes. To get started they can be mobilized by social and political movements to take up experiments and implement innovations in HEIs around this alternate perspective (Dinesh Abrol, 2010).

Alternate proposals

Ensure all public and private higher professional education institutions create facilities and resources for the integration of research, teaching and outreach;

Provide public funding for the regeneration of public and private professional educational institutions with the obligation that all the institutions follow the same common low fee structure for admissions and the same salary structure for the faculty

Strengthen affiliated colleges and state universities, do not dismantle the non-elite institutions, be they have been formed as public or private institutions, through the proposed path de-privatization through de-commercialization and of incorporation of public purpose into education, research and outreach functions.

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

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Notes

ⁱThe crisis of higher education came early during the implementation of Fourth five-year plan, the Central government was found to be advising the states to stop the expansion of higher education. Except for IITs and IIMs which came up as a part of the elite higher education system of institutions, the Indian universities were faced with student protests in a large number of states of North, Central and East India. Students were seeking political change; the inability of the system to absorb the graduates and post graduates coming out of these universities was the reason. While the Indian state has been maintaining the funding privilege of elite institutions, but expectations of the students of non-elite institutions were not being met. The impact of mismatches between supply and demand was showing up in the growing

numbers of unemployed and in the socio-economic disparities.

ⁱⁱ BVR Mohan Reddy in his report to AICTE states that currently (2017-18) capacity utilization in undergraduate and post graduate level is as low as 49.8% (Capacity vs. Enrolment). We recommend that we do not create any new capacity starting from the academic year 2020. The creation of new capacity can be reviewed every two years after that. We recommend that no additional seats are approved in traditional areas. Creating any further capacity is a big drain on investments since at the very basic level it involves the creation of physical infrastructure like buildings and lab infrastructure. BVR Mohan Reddy feels that the primary reason behind a college failing to survive lies in its inability to offer any differentiation, value for money and most importantly, internships and industry connect, which is crucial for engineering and MBA institutions. Which is why, he says, he has decided to set up their own faculty development institute modelled on the lines of staff training colleges of banks along with a focus on internships. BVR Mohan Reddy states that Institutions should be encouraged to current capacity in traditional disciplines to emerging new technologies. It may be very important to take immediate steps to improve the quality of our teachers. Training of existing teachers at teachers training institutes, using quality improvement programs (QIP) and using IIT/NIT faculty and infrastructure are some of the immediate interventions we recommend.

ⁱⁱⁱ In the domain of engineering education, there is the distinctive feature that the south is an important contributor to the total seats with a high concentration of 50.2 per cent and almost the same proportion in intakes. This is across Telangana, Andhra, Karnataka, Tamil Nadu and Kerala. Reddy says, "What we have ended up with seems to have been a result of an unplanned and aggressive expansion in capacity

creation without any focus on building quality faculty,” See the findings and recommendations of the report entitled “Engineering Education in India-Short & Medium Term Perspectives, prepared by BVR Mohan Reddy Chairman & Members of AICTE Committee for preparing “Short and Medium-term Perspective Plan for Technical Education”.

^{iv} E Kumar Sharma New Delhi, June 25, 2019 reports that many engineering entities could not attract students, some of those failed to renew their licenses as well. If colleges fail to admit more than 30 per cent of their capacity for three consecutive years, they automatically stand to lose their licenses and cannot admit more students. Besides, the land and the real estate they invest in would hardly yield any return. In most cases, there were no added attractions to be in the space. For example, incentives such as fee reimbursement for weaker section students under student sponsorship programme had been withdrawn by some states like united Andhra Pradesh (before bifurcation into Telangana and Andhra). All of this put a question mark on their financial viability, especially in cases where there was no corpus fund and a philanthropic mindset to start with.

^{vi} Pharmacy education means educating the student in the art and science of manufacturing and dispensing of drugs prepared by natural and synthetic sources, and using them for the treatment and prevention of diseases. Pharmacy encompasses various professional skills, such as knowledge for drug synthesis, quality control tests, and detection of degradation products and storage of pharmaceutical products as well as dosage form preparation, route of administration, drug-drug and drug food/herbal interactions. Unfortunately, private pharmacy institutions in India have been reduced to training pharmacists in the selling of medicines. The Indian educational and pharmacy practicing standards require extensive revision.

^{vii} Even the crisis of “bandwagon expansion” of electronics and IT education undertaken through the low-grade private sector engineering institutions can be seen as having its roots in the failure of the centre and states to undertake joint planning. Although there existed the capacity in the public sector to tap home market demand under development in the sectors of industrial electronics to supply low cost automation, telecommunications, power and railway electronics, rural electronics and e-governance to the small and medium scale (SME) sector, but the Centre and State governments did not proceed to bring together the non-elite educational institutions and the SME sector to provide the wherewithal to the engineers for the tasks of production, investment, research and design. Previously now-the-elite institutions of public sector, regional engineering colleges (RECs), were also neglected and not of as much interest due to their small size then. It had been forgotten that they also exist and can still perhaps serve the nation.

7.

Healthcare Education in National Education Policy

Dr.T.Sundaraman

There are many aspects of the National Education Policy that are of serious concern for those who are working for peoples health. The larger concern is that the overall trend in the policy is for an accelerated push towards centralization and commercialization of education, and little concern for equity in access or the use of education to address existing inequities in society.

Of special concern to the Jan Swasthya Abhiyan is how these trends play out with regard to healthcare education. The Healthcare section of draft National Education Policy approaches this 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 NEP 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, even if they eventually become available cannot compensate for the high fees that private medical colleges set and 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-served 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 etchas 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 JSA is further concerned that the NEP proposals 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 interests private agencies would have.

But the central concern with the NEP 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.

The proposal “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 studying for a separate, competitive entrance examinations 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 draft 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 nationwide 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 boards examination results comparable.

Too much of pan-India objective exams 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-

The JSA calls for a policy where statutory bodies with adequate staffing can organize periodic quality reviews- that 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 NEP's proposal on having 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 draft NEPs section 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 this section on healthcare education with more consultation of people who have less conflicts of interests than has been done for the current draft.

8.

Draft National Education Policy – Seductive Sophistry in Service of the RSS

Venkatesh Athreya

The declared vision of the draft National Education Policy (DNEP) prepared by a committee chaired by the former chairman of Indian Space Research Organisation (ISRO), Dr. Kasturirangan, is '...an India centred education system that contributes directly to transforming our nation sustainably into an equitable and vibrant knowledge society, by providing high quality education to all.' (Emphasis in original) But the policies recommended in DNEP will not provide high quality education to all. Instead, they will Image for representational use only. Image Courtesy: Velivada increase the degree of exclusion that is already such a defining feature of the education system in India.

There are three basic features of DNEP that it is unable to camouflage despite its clever attempts to do so. These are: complete commercialisation and corporatisation of education; enormous centralisation of the education sector in terms of policy-making, regulation, evaluation, assessment and financing; and a communal slant that assigns to one strand of 'Indian' traditions a privileged status, while showing no commitment to the constitutional values of secularism, social justice, democracy and federalism.

In direct opposition to treating education as a basic human right to be guaranteed by the State, the DNEP makes recommendations that turn education completely into a commodity, to be bought and sold. Further, it not only takes



forward with rapidity the process of privatisation and commercialisation of education at all levels, which are already under way in the neoliberal regime prevailing since the early 1990s in India, but also seeks to corporatise the education sector. Along this path, the DNEP makes several seemingly grand but essentially empty declarations with no related operational commitments. Its recommendations – both with regard to school education and with regard to higher education – notwithstanding some reasonable remarks on pedagogy, some of the ills of the present education system, teacher training and so on, run counter to inclusive and equitable education at all levels.

At the school level, its call to close down small schools on grounds of non-viability and to create larger school complexes, containing within one campus a whole gamut of institutions from those delivering early childhood care to those providing instruction from classes 9 to 12 will imply much longer distances and more expenditure for children to attend school, and will result in reduced access for the Underrepresented Groups (URGs), especially girls. When it comes to higher education, the DNEP proposals are even more drastic. It calls

for closing down the system of affiliation of colleges in a given territory to a university, and recommends only three types of higher educational institutions (HEIs): (i) universities focussing primarily on research, (ii) those focussing primarily on teaching and (iii) stand-alone, autonomous colleges empowered to grant degrees without any affiliation to any university. It also insists that individual HEIs of each type should be large with several thousands of students and have a multiple of disciplines. The call to close down the system where a number of colleges in a region are affiliated to a university in the same region completely fails to appreciate the mutual benefits that the university and its affiliated colleges derive from this system and its positive impact on the quality of collegiate education. Moreover, it centralises HEIs geographically, thus raising the private cost of education for the individual students who may have to travel a considerable distance to reach the HEI and may in fact have to bear the costs of residential accommodation in many cases. It talks breezily of reducing the current number of HEIs which is close to 50,000 to a fifth of this number in a decade or so.

The DNEP swears by “autonomy” whereby each HEI becomes an autonomous, degree-granting institution and moves rapidly to a situation of academic, administrative and financial autonomy. But this does not imply commitment to democratic functioning of HEIs. In fact, DNEP means quite the opposite of this. It sets up a corporate model of management for HEIs. It is the autonomy of the “Board of Governors” and the “CEO” of the HEI that DNEP celebrates. It makes no proposal for democratic participation of teachers, students and non-teaching staff in the running of HEIs. It wants as little regulation of HEIs, especially private ones.

DNEP sets a target of a gross enrolment ratio (GER) at the level of tertiary education by 2035 of 50% from its present level of 25.8%. It seeks to achieve this not by expanding brick

and mortar HEIs but primarily through mass open on-line courses (MOOCs) and open digital learning (ODL). It pays no heed to evidence that shows the weakness of MOOCs. Digital learning cannot be a substitute for class room interaction between teachers and students. It can only be a supplement. The stress on MOOCs and ODL derives directly from the implicit view of the DNEP that government cannot find the money to finance the order of expansion envisaged in the GER target of 50%.

This is the crux of the issue. Within the neoliberal regime, the State is committed to low levels of the “fiscal deficit” which is defined quite simply as total expenditures minus *non-debt receipts* (thereby delegitimising government borrowing). The fiscal deficit target, moreover, must be achieved not by mobilising the resources from the rich and the corporate sector, but by drastically pruning expenditure. DNEP implicitly accepts the fiscal constraint thus defined and refuses to specify where the financial resources for its grand plans will come from. By default as well as through some explicit remarks, DNEP expects the share of private funding of education to be substantial, but since it also wants education not to be driven by profit, it makes the comforting but absurd assumption that such private finance will come through philanthropy and Corporate Social Responsibility (CSR) funds!

Not only is DNEP committed thus to privatisation, corporatisation and commercialisation, it is also in favour of centralisation of an extreme kind. The supreme body here is the Rashtriya Shiksha Ayog (RSA) which will be chaired by the Prime Minister and will consist of some Union ministers, senior bureaucrats of the Government of India, a chief minister or two, and a small number of select “educationists”, all to be nominated essentially by the Prime Minister. The RSA will, in turn, make all appointments to the new decision making

bodies in higher education that will, regulate HEIs, assess them, give them grants and fund their research, respectively. Out goes any pretence of “cooperative federalism”, not to speak of democratic decentralisation!

In addition to its commitment to commercialisation/ corporatisation and centralisation, the DNEP is also quite willing to go along with communalisation by privileging one strand of so-called Indian traditions, the one favoured by the ideologues of Hindutva.

To sum up, the DNEP has three main thrusts: corporatisation and privatisation; centralisation as against federalism and the rights of various linguistic and cultural nationalities; and a communal reading of India’s composite traditions and history.

Courtesy : newsclick.in

9.

Draft National Educational Policy, 2019: Response on Higher Education.

S.Chatterjee

Retired scientist, Indian Institute of Astrophysics,
Bengaluru.

S.Krishnaswamy

Retired Professor, Madurai Kamaraj University.

Parthib Basu

Professor, Zoology Department, Calcutta university.

The 480 page document does not read like a policy but a manual with pious aims, thrown in. In terms of word length, it is longer than the Indian Constitution.

The document lays bare a display of inconsistencies. Its underlying aim is to give a free access to private parties to enter Education industry, with the entire nation being converted to a market. In order to justify this, it makes very pious effort to explain that private profit in education can lead to public good.

Even before recommending the changes, it has not made any attempt to review if the higher education system could be restructured by other means, e.g. is there any review of the institutions like UGC etc. What would happen to the existing institutions, like, universities, colleges, IITs, IISc, ISERs? Have they satisfied their mandate or are all of them to be treated in

the same way and thus give way for mega universities and institutions? Who is going to build them? The answer, unstated though, is “Private Philanthropy”.

Further, while granting “HEIs will have real and complete autonomy-academic, administrative and financial- to unleash their full potential for excellence...” [P17.1.20] the entire system will be controlled by an RSA and the states too will have to accept the RSA’s control! **HOW does that satisfy autonomy???**

Thus while taking away academic autonomy, it will give financial autonomy. But the document does not state how public institutions are to execute their financial autonomy while the private players are known to find means to satisfy the financial autonomy and that freedom is given to them.

The document, while exhorting the desire for “Promotion of Indian Languages” [Chapter 22] did not consider it fit to make complete translations into all Indian languages in the Eighth Schedule, being thus limited in access to only those who know English and Hindi. Only a partial summary like document was made available belatedly in a limited number of languages. Its intent does not match with its actions.

The consultation process appears to be biased and not inclusive of the political and religious diversity. Only some groups with political leanings similar to the ruling party have been included. A broad based democratic consultation is required involving students, teachers, parents and other stakeholders.

The State Governments have not been included in the consultation process and the rights of the States have been

completely ignored, especially considering that Education is in the concurrent list. **The draft NEP2019 should be repealed and a fresh draft should be prepared after extensive consultation and taking into account the feedback received.**

The comments given below are limited only to points related to Higher Education.

Comments:

Concerning the vision:

1. The document expresses a pious dream of transforming the mindset of the wealthy so that they make concessions to their amassment of wealth and wake up to the societal duties, in the area of higher education.

2. It thus laments that “While India has had a long history of private philanthropic educational activity and direct institutional intervention in education, this impetus was lost after first half century post-Independence”[A1.2.5: Role for non public sources of funds, p404] and thus “calls for rejuvenation, active promotion and support for private philanthropic activity in the education sector” [A1.2.6: Approach of the Policy to encourage not-for-profit, public spirited private funding in education, p 405]. In order to satisfy this task, one [presumably, the state] has to take into account “ the hurdles that philanthropic initiatives face, and the philanthropic intent of the public, especially the wealthy” . In essence, preaches “***Benevolence of the wealthy.***”

3. While lamenting that public funding of education is desirable, it does not assert the states’ [governments at the

centre and the states] duties but assures that “In line with the spirit of providing autonomy to educational institutions to charter their own course, fees for professional institutions will be left to the management of educational institutions, both public and private.” [P 16.5.1: Fees for professional education: p299]. This assures a ***freedom to exploit the education market.***

4. The above shows that the main idea is to create a philosophical framework that will abdicate the Government’s duties towards education. That role would be replaced by private philanthropy, aimed at public good, being monitored by “Light but tight regulations” [P9.8], i.e. ***“private profit can lead to public good”***

5. Even with such faulty approach, it hopes that with the freedom given to the private industry [better to be called education business], it will be possible to provide “ Equitable access to quality professional education” [P16.5.2] and “Improving equity and inclusiveness in technical education.”[P16.9.3]

6. And the above is to be achieved, by the following measure, “ ...Up to 50% of the students qualifying for admission must receive some degree of scholarships, and a minimum 20% of these must receive full scholarships.” [P16.5.1: p 299]. Question arises, “In how many institutions, public and private, has such a scheme been attempted and implemented?”

Concerning the operational scheme:

7. The document notes the **“Lack of teacher and institutional autonomy”** [p 204, Bold in the original] and

“The lack of research at most universities and colleges”[p.205]. How does it aim to rectify the problem? That is sought to be done by creating a 3-structured system of institutions, with Type 1 as Research Universities, Type 2 as Teaching universities and Type 3 as Colleges “To follow high quality teaching” [see P10.3]. Then how are these institutions’ performance to be judged? For example, for type 2, what should be the mix of teaching and research? And for type 3, would research to be made a mandate? Why should they be judged in terms of something that is not in their mandate?

8. Further, if the idea is to attract talented individuals to the profession of teaching, i.e. to have an “Energised, Engaged, Capable Faculty” [Chapter 13, p 255] how would it attract such motivated individuals if they have to serve a five year’s probation?

9. To reinvent a Takshashila or Nalanda in the 21st century is anachronistic and a-historic just as it is a wasteful drain on one’s faculty to have a “Liberal Education accompanied by rigorous specialisation” to be promoted through “Multidisciplinary Education and Research Universities”[p.221].

10. What is the need of a National Research Fund (NRF)? Whom is it to support? Who should fund it? Most likely, it will be funded by the public. Do not, our private business also raise their funds from public financial institutions? And when the private business crashes, is it not the public financial institutions that provide the exit route for the private business? In this case too, the private business in education will most likely be financed through public funds. Or, let it be made clear that the NRF will be purely used so that “Financial autonomy will be achieved by adequate public funds being committed and being given to the Public HEIs, with stability and certainly”

[p.319] and NOT for private institutions. What about the government's budgetary allocations??? That should be 6% of the GDP for education and 1% for science and technology.

11. Let us look at the staggering numbers. About 150-300 Type 1 Research universities with intake of 5000-25000 students will have 7 lakh 50 thousand -75 lakh students. Type 2 Teaching universities will number 1000-2000 with 5000-25000 students and will thus have 50 lakh -5 crore students and the envisaged 5000-10,000 Type3 colleges with 2000-5000 enrolment will have 1 crore to 5 crore students. All these add up to 5 crore – 10 crore enrolment. This means that 1/13th of the population in terms of the 2019 projected population would be in higher education!!!! How does one make sense of these, when we know that in Karnataka 60% of the seats remain vacant [The Hindu, Bengaluru edition, 12.08.2019], when there are “Few takers for PM research scheme”[Deccan Herald, Bengaluru Edition, 24.06.2019] ,while vis a vis “Strategic thrust on new and emerging disciplines in professional education” [P16.9.2], “Encouraging industry interaction”[P16.9.3] and “Improving equity and inclusiveness in technical education”[P16.9.4] the document makes no reference to the ground condition that “Bankruptcies galore in the manufacturing sector”[Deccan Herald, Bengaluru Edition, 12.08.2019].

12. While aiming at providing autonomy to institutions of higher education, the document produces a National Higher Education Regulatory Authority to as the “sole regulator for all higher education”[P18.1.4, p 326] with a Rashtriya Uchchatar Shikha Abhiyan to plan it!!! What happens to the states and their federal duties.

These inconsistencies are too serious to be glossed over when the nation's future is to be decided by the given document. It is in fact a conglomerer of inconsistencies that mingle with conflicting aims and actions.

The DNEP 2019 is a document that has all the ingredients to justify its rejection.

10.

Comments on NPE 2019:

Geeta Mahashabde,
Navnirmithi

About the committee –

Most members are not related to school education. No one is related to Early childhood education. Such committees should also have field officers, elementary, secondary and university teachers.

About the process –

The draft policy should be shared in Indian Languages. Three months should be given after that for sending comments. (state, district, block and village level deliberations should be done during this period). Government officers and drafting committee members should also do such deliberations themselves. That will help them to carefully consider the opinions of various stakeholders.

Comments on the contents of the draft :

Disconnected Draft :

⌚ The draft is not rooted in history of education in India. Does not take cognizance of the constitutional mandate of RTE 2010, its implementation to some extent in all states, NCF 2005, the NCERT textbooks based on NCF 2005, state textbooks thereafter. It suggests new things without having connection with where the country is today. It also suggests many things which are already part of the education system (e.g. clusters working as a group of schools, continuous assessment, etc)

⌚ Many suggestions in this draft are attractive propositions

but they are suggested without considering today's reality on the ground. E.g. sharing resources between school complexes is not practical at many places because of geographical barriers. Schools', Teachers' and officers' motivation level and their today's capacities, corruption etc)

⌚ Another example – Teachers should not be overburdened, especially with non-teaching activities, or with the teaching of subjects outside their expertise. RTE has specifically mentioned which national duties teachers will be asked to do. But if teachers are seen as the only educated resource in the field by all departments, if they are answerable to multiple departments, this is not going to happen. There are no structural changes suggested made to change this situation.

⌚ **Education does not happen in isolation.** It happens in the schools, which are within societies, run by the members of society. So, if we want equal, just culture in the school, the government has to ensure that the same will be there in the society. Today the document is talking about big dreams, but the government is taking things in the opposite direction. E.g. the document talks about dignity of all persons in the schools. The government is pushing citizenship bill which excludes muslims. The document does not talk about secularism at all. How will children learn that 'all human beings are equal' .?

Attacks on/ dilution of constitutional mandate, values and commitments

⌚ Draft NEP mentions foundational pillars of access, equity, quality, affordability and accountability. Does not mention constitution, equality, secularism, democracy as foundations of this policy.

⌚ Centralization of education in the hands of Rashtriya Shiksha Aayog headed by prime minister is suggested. This undermines states' rights as a subject of concurrent list.

⌚ The words and concepts of socialism and secularism are completely missing from draft NPE 2019. There is not a single mention of these words.

⌚ Though the draft talks about extending RTE act to the age of 3 to 6 and 14 to 18, it has diluted its commitments in various ways.

⌚ **NPE 1986 says** –It mentions education as *furthering the goals of socialism, secularism and democracy enshrined in our Constitution*. It also warns that *India's political and social life is passing through a phase, which poses the danger of erosion to long-accepted values. The goals of secularism, socialism, democracy and professional ethics are coming under increasing strain*. It further says, *All educational programmes will be carried on in strict conformity with secular values*.

Draft NPE 2019 –the words secularism and socialism are dropped.

- ◆ The draft has a section on Development of constitutional values. The preamble of constitution and citizen's duties as per directive principles should have been included here. Even from the list of values mentioned here, the words socialism and secularism are dropped.

- ◆ Equality is used as a value, but no emphasis on 'children having equal rights'. The actions suggested are against this right (e.g. NIOS for migrant and CWSN children). Equal rights is replaced by inclusion.

- ◆ Instead of equality and equity, the document talks about inclusion and equity.

- ◆ It talks about sensitising students towards human values such as respect for all persons, empathy, tolerance, inclusion and equity (Secularism and equality are missing)

- ◆ In a flowery title of 'multiple pathways to learning' NIOS is suggested to give programmes equivalent to grade 3,5 and 8, for 'children who are not able to attend a physical school.'. This is violation of children's constitutional right of education and also of their right to equal opportunity.

· **RTE**

The documents appears to be extending RTE act to the ages of 3 to 18. This step is welcome. It also has a good mention of MDM. ECCE has some good points. But if you get into details, it's a huge retreat and/or dilution in main part of RTE. In fact, it is complete undermining of RTE done consciously.

· **Dilution of RTE in the following manner –**

□ Right to education is replaced by mission mode and is left to peoples' voluntarism.

□ National Tutor's programme (NTP) – Is based on the idea that peer tutoring in Gurukuls was successful. Peer tutoring in gurukuls was mugging up. There was no learning.

□ Remedial Instructional Aides Programme (RIAP) – The failure of curriculum and system is put to local community volunteers. Local community members holding remedial classes means tuition classes.

□ RTE talks about right to quality education till **completion of quality elementary education**. Draft NPE at most places talks about '**Access to quality education, or opportunity to participate in quality education.**' The substantive approach taken by NCF 2005 of equality of outcomes is missing from this document.

□ RTE has rigorous definition of 'school' - NPE Proposes multiple pathways to learning involving formal and non-formal education modes, (CWSN and children of migrant workers are mentioned here – page 71 -this suggestion should be outrightly rejected) NIOS to offer education at A, B and C level (grade 3, 5 and 8) for children who cannot reach physical school.

□ RTE gives minimum norms on infrastructure. NPE suggests to dilute this. Page 187

□ RTE – Section 8 - Responsibility of the government to ensure good quality education for every child till completion

of elementary education. NPE Page 366 – Responsibility of the school to ensure that all students continue to remain in school till completion of grade 12.

□ RTE explicitly mentions that it is responsibility of the govt to ensure that every child gets education of good quality. Central and state government have concurrent responsibility of funds. NPE does not explicitly give the responsibility to the government this, neither does it reject this. But explicitly encourages private philanthropic school sector and public spirited private schools.

□ RTE talks 'every child learning to the fullest of her potential and completion of elementary education' as child's constitutional right and government's responsibility. NPE directly and indirectly suggests the path of skill education for underachievers, and competitive exams and merit based scholarships / incentives for performers. This is discriminatory and therefore against the constitutional right.

□ RTE sees education as a constitutional mandate for the government. NPE sees education as a national agenda.

□ RTE clearly defines 'child belonging to disadvantaged group, child belonging to weaker section' . NPE talks about 'Underrepresented groups' which is not clearly defined.

□ RTE makes it compulsory for private schools to admit 25% children from disadvantaged and weaker sections. NPE suggests to make it optional and suggests to motivate the managements to do it voluntarily.

About Early Childhood Education –

→ Title is still ECCE and not ECE important as the care (nutrition, immunization etc) will be looked after by MWCW.

→ Education is not just literacy and numeracy but much deeper—thinking and self expression, awareness, etc..

→ ECE is considered to be a precursor to something—

like primary education, jobs, etc. However ECE is important in itself. That needs to be taken seriously. Otherwise the first standard curriculum will be pulled down.

→ they are talking about system of ECE institutions—page 48. There are no such institutions. There are very few training institutions.

→ p.48—Elementary education needs to be defined.

→ the whole framework is task or activity based. The image of a child as a capable learner needs to be articulated as the curriculum will emerge from it.

→ p.50— Are they planning to give one extra anganwadi worker to each anganwadi for ece?

→ material includes a lot of prescriptive and closed ended material.

School complexes – Way to closure of small government schools?

In Maharashtra, 1314 schools having less than 10 children were decided to be closed. Most of these schools have parents who have no voice in this system. Most of these have 100% SC/ST students. In Akole block of Ahmadnagar district 14 schools were in this list. Out of that 9 were having 100% ST children.

About 300 such schools have been closed before there was any noise from teachers, parents and communities. State is moving towards closing schools having less than 20 students.

Dilution of ‘Education’ to ‘Literacy and Numeracy’

✗ Foundational skills do not include thinking.

✗ Students of grade 5 are expected only foundational literacy and numeracy.

✗ RTE assures completion of quality education upto class 8. Draft NPE 2019 talks about ‘access to quality education’ at most places.

✎ RTE and NCF 2005 mention higher order learning objectives. NPE talks about foundational literacy and numeracy.

Education seen only in a perspective of economy and to be managed in corporate way–

❖ **NPE 1986 says** - *Education develops manpower for different levels of the economy. It is also the substrate on which research and development flourish, being the ultimate guarantee of national self-reliance. In sum, Education is a unique investment in the present and the future. This cardinal principle is the key to the National Policy on Education.*

The word self-reliance is missing from draft NPE. It says a positive thing about investment in education as follows - *It needs to be noted that this Policy considers all financial support and spend on education as investment', and not as 'expenditure'. Clearly, monies spent on education are all investment into the future of our nation.*

But when it talks about ECCE it says - *Investment in ECCE is among the very best investments that India could make, with an expected return of Rs. 10 or more for every Rs. 1 invested.*

Thus NPE sees at Education in the language of ROI, capital.

❖ NPE says - India 'aspires' to become the third largest economy by 2030-32. Our ten trillion economy will not be driven by natural resources, but by knowledge resources. So, the priority has shifted from welfare of all to the economy.

❖ Corporate model of education management. E.g. Performance appraisal process for teachers.

Encouragement to privatization (Philanthropic / public spirited private schools etc)

Though there is discussion on 'public education'. Favours to private schools like

- ☞ TO be encouraged
- ☞ Dropping compulsion of 25%
- ☞ Allowing to increase fees (reasonable)
- ☞ Autonomy

Harmonization of functioning bodies

The main reason is lack of quality in spite of multiple efforts was lack of harmonization between dept of education, various bodies under it and SSA. Therefore SCERT was declared as an academic authority. Other bodies were either merged with SCERT or were supposed to work in close coordination with it. There is evidence that when all bodies work in harmonization quality of education can be improved.

NPE has proposed exactly the opposite. It proposes that Rashtriya Shiksha Aayog (RSA) will take care of policy, Department of school education (DSE) will take care of operations and State School regulatory authority (SSRA) will take care of regulation and SCERT will take care of academic matters. This will create new issues of harmonization.

Other observations -

- ❖ Ethical/moral reasoning instead of evidence based rational reasoning
- ❖ CCE in various forms to computer based adaptive assessments
- ❖ Opportunity to participate instead of Capacity building
- ❖ Learners instead of 'every child'
- ❖ Obligatory for 'public system', instead of obligatory for the 'government'
- ❖ Communication instead of expression
- ❖ National tutors' programme (NTP) + Remedial instructional aides programme (RIAP) instead of special training as per RTE

❖ In NPE 2019, On one hand the policy recommends increase in expenditure on education, and on the other hand it talks about

- o 'finding' funds quickly
- o philanthropic funds for infrastructure, learning materials, workbooks etc.
- o It talks about merging of schools having less than 20 students by calling them 'non-viable'.

❖ Creating parallel structures instead of strengthening the existing ones. E.g. high quality stand alone preschools will be built in areas where existing anganwadis and primary schools are not able to take on the educational requirements of children in the age 3 to 6 (page 50).

❖ It uses the word 'unfortunately' for talking about biases. They talk about prejudice and bias based on gender, economic status .. but do not mention cast and religion.

❖ It talks about sensitizing learners for inclusive education. But doesn't talk about sensitization of the system from government to teachers.

❖ It talks about change in school culture, to sensitize everyone for respect and dignity of all persons. In a country of killings of rational people and mob lynching how is this going to work only inside schools?

❖ Right diagnosis and right principles on many issues, but wrong solutions. E.g. many children of class 5 cannot read, write and do arithmetic. The proposed wrong solution is over-emphasis on foundational literacy and numeracy.

❖ Objectives of NCF 2005 are lost in the programme like foundational literacy and numeracy. (page 55)

❖ In Remedial instructional aides programme they have suggested to group children by level and pace. (so merit for the toppers and skills for the weakers???? As hidden agenda??)

❖ Statements like 'a large proportion of students who fall

behind during their elementary school years in fact fall behind during the first few weeks of grade 1' are against pedagogical principles and spirit of NCF 2005. They are proved wrong in practice in examples like Kumathe Beet and many others.

- ❖ The schools need autonomy and strength. – Right diagnosis. Schools complex will give it may not be the right solution.

- ❖ The processes which are already supposed to be there (e.g. making of school development plan to SDP) are suggested as new solutions , without addressing the issues of why they are not properly functional.

- ❖ Subject selection at class 9? Also allowed to drop some key subjects at class 9? Dilution of rigorous subjects.

- ❖ DSE must facilitate accreditation but DSE officials will not be involved – How would they own the observations?

- ❖ Accreditation of schools, promotions of teachers etc dependent on SMC, peer schools/ teachers and SCMC. What about the corruption and politics there?

- ❖ **School complex –**

- It may not be possible to share resources because of physical distance and geography.

- Closure of smaller schools seems to be on agenda

- Team at school complex may have too many bosses.

- Entry to corporates may be easy in school complexes

- Hostel/transportation cannot be relied upon in today's

circumstances.

- ❖ A major effort of data collection is suggested. Are they taking into consideration their own tampering of data in NSSO.

- ❖ Wrong data page 82 ?– 54% Indians speak Hindi?

- ❖ Pedagogically correct point picked up for pushing hidden agenda e.g. 3 language point page 80

- ❖ Trying to 'establish unity' instead of/before celebrating 'diversity'

- ❖ Sometimes tradition and scientific temper may clash, or ethical reasoning may clash with evidence based reasoning. What is the reference point to resolve these issue?
- ❖ Ethics being taught as a subject?
- ❖ Only essential core content in NCERT textbooks? (page 102).
- ❖ Private people encouraged to write textbooks (page 103)
- ❖ Assessment has to be closely linked to learning. NPE proposes to disconnect it. Creating parallel structures – National testing agency (NTA).
- ❖ Singular interest groups to be run on funding, rigorous merit has funding, remedial etc to be based on voluntary.
- ❖ High respect for teachers is to be restored. Want best future for students and nation. This can be done only by giving ‘best possible present’ to our teachers. No such plan seen. Performance, merit, performance based confirmation and salary (only for teachers?), incentives etc is suggested as solutions. Corporate ways.?
- ❖ Local language speaking teachers in rural areas. ...???

Motivation –

The draft accepts that the entire system needs motivation. But instead of having constitutional dream of “Every Indian citizen being able to live with dignity, in equal and just society and having decent living” it has a dream of “bringing back the ancient Indian education system”. It is silent on girls and children of some casts not having access to education in ancient India.

Role of Education – Aims of Education

NPE 1986Draft	NPE 2019
<p>THE ESSENCE AND ROLE OF EDUCATION 2.1 In our national perception, education is essentially for all. This is fundamental to our all-round development, material and spiritual. 2.2 Education has an acculturating role. It refines sensitivities and perceptions that contribute to national cohesion, a scientific temper and independence of mind and spirit - thus furthering the goals of socialism, secularism and democracy enshrined in our Constitution. 2.3 Education develops manpower for different levels of the economy. It is also the substrate on which research and development flourish, being the ultimate guarantee of national self-reliance. 2.4 In sum, Education is a unique investment in the present and the future. This cardinal principle is the key to the National Policy on Education.</p> <p>The National System of Education will be based on a national curricular framework, which contains a common</p>	<p>From ancient India – The aim of education in ancient India was not just the acquisition of knowledge, as preparation for life in this world or for life beyond schooling, but for complete realisation and liberation of the self.</p> <p>The vision of India’s new education system has accordingly been crafted to ensure that it touches the life of each and every citizen, consistent with their ability to contribute to many growing developmental imperatives of this country on the one hand, and towards creating a just and equitable society on the other. We have proposed the revision and revamping of all aspects of the education structure, its regulation and governance, to create a new system that is aligned with the aspirational goals of 21st century education, while remaining consistent with India’s traditions and value systems.</p> <p>It seeks to ensure that human capital, the most</p>

core along with other components that are flexible. The common core will include the history of India's freedom movement, the constitutional obligations and other content essential to nurture national identity. These elements will cut across subject areas and will be designed to promote values such as India's common cultural heritage, egalitarianism, democracy and secularism, equality of sexes, protection of environment, removal of social barriers, observance of small family norm and inculcation of scientific temper. All educational programmes will be carried on in strict conformity with secular values. India has always worked for peace and understanding between nations, treating the whole world as one family. True to this hoary tradition, education has to strengthen this world-view and motivate the younger generations for international cooperation and peaceful co-existence. This aspect cannot be neglected. To promote equality, it will be necessary to provide for equal opportunity for all, not only in access but also in the conditions of success.

vital form of capital that would fuel the necessary transformation, is secured and strengthened. Highest priority is accorded to the task of ensuring universal access to an education of high quality and breadth that would support India's continued ascent, progress, and leadership on the global stage - in terms of economic development, social justice and equality, environmental stewardship, scientific advancement and cultural preservation, and help develop and maximise our country's rich talents and resources for the good of the individual, the country, and the world.

The common core curriculum shall aim to develop broad capacities and important dispositions, including but not limited to: critical thinking (e.g. courses on statistics, data analysis, or quantitative methods); communication skills (e.g. courses on writing and speaking); aesthetic sensibilities (e.g. courses in

Besides, awareness of the inherent equality of all will be created through the corecurriculum. The purpose is to remove prejudices and complexes transmitted through the social environment and the accident of birth. National Policy on Education, 1986

Commitment RTE – Right to good quality education.

Quality defined by NCF 2005 which is notified as per RTE – The formal approach, of equality of treatment, in terms of equal access or equal representation for girls, is inadequate. Today, there is a need to adopt a substantive approach, towards equality of outcome, where diversity, difference and disadvantage are taken into account.

A critical function of education for equality is to enable all learners to claim their rights as well as to contribute to society and the polity. We need to recognise that rights and choices in themselves cannot be exercised until central human capabilities are fulfilled. Thus, in order to make it possible for marginalised learners, and especially girls, to claim their

music, visual art, or theatre); scientific temper and the scientific method; an understanding of India, our context, and our challenges (e.g. courses on India's history and diversity, or on the social realities of contemporary India); Constitutional values and their practice; social responsibility and moral and ethical reasoning; an adequate exposure to multiple disciplines and fields including the arts, humanities, and sports; and science in relation to society and the environment.

(Secularism deleted from list of Constitutional Values)

<p>rights as well as play an active role in shaping collective life, education must empower them to overcome the disadvantages of unequal socialisation and enable them to develop their capabilities of becoming autonomous and equal citizens.</p>	
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Half truths/ lies used to push RSS agenda. -

* Ancient tradition is mentioned by over emphasis, but doesn't talk about exclusion of other casts and women from that system. e.g. page 27

* *The Right of Children to Free and Compulsory Education Act, 2009 (RTE Act) which came into force in April 2010, entitles every child of the age of six to fourteen years to the right to free and compulsory education in a neighbourhood school till the completion of elementary education. However, despite progress in some aspects, a mind-numbing uniformity prevails in the education system today, one in which students are not nurtured for their individual potential, incomplete antithesis to our ancient traditions.*

11.

Comments on Vocational Education (VocEd) (with some Comments on related aspects of Technical/Professional Education)

...**D.Raghunandan**

Delhi Science Forum &
All India Peoples Science Network

1. The proposals in NEP2019 on Vocational Education are to be seen in the context of the overall new policy framework on Secondary School Education and Higher Education. Detailed comments on different aspects of the NEP2019 are given in separate Annexures. This Note confines itself to Vocational Education. However, some Comments on a few related aspects pertaining to Technical and Professional Education are also given so as to round off the discussion on VocEd.

2. The Perspective The broad perspective with which Vocation Education (or Technical & Vocational Education and Training as it is more widely known) is approached in NEP2019 has been well stated as follows: “The matter of social status hierarchy of occupations has vexed higher education [in India] in multiple ways. It has significantly influenced the public perception of vocational education and thus the choices that students make in higher education. There is no gainsaying the fact that vocational education has been less desirable to students making these choices. [The] ‘hard’ separation of vocational education from academic and professional education, most clearly manifested in complete institutional and curricular separation from school onwards,

has had a role to play as has the mostly indifferent quality of vocational education institutions. *This situation is in urgent need of change.* Vocational education must become an attractive option for students to choose from. This is crucial for the wellbeing of the millions of people joining and already in the workforce. *It is equally important for the national economy.*" (P.20 page 357) (emphasis added throughout).

2.1 This marks a clear and welcome departure from the manner in which VocEd has been viewed and institutionalized thus far, from being seen as an inferior option for academically weak students and potential school drop-outs, leading to a rigid separation of "education" from "skills," the former being for middle-class white collar students and the latter being for working/lower class, blue collar youth who need only physically skills but no knowledge inputs. Correlation with India's caste system and division of occupations between the "upper" castes in intellectual work and business, and the "lower" castes in manual work including artisanal crafts and trades, is inescapable.

2.2 This past and current state of affairs has not only limited skills that may be imbibed by youth, since commensurate educational or knowledge components are missing, but has also hampered the development of modern industry in India where a severe shortage of adequately skilled and educated workforce is one of two major deficits of the Indian economy cited by both foreign and domestic industrialists/ investors along with poor infrastructure. The XIIth Plan data cited in NEP2019 of less than 5% youth (19-24 years) workforce in India having had formal [quality] VocEd training and education compared with 55% in the US, 75% in Germany and 96% in South Korea, (p.357) as well as other comparatively advanced industrial economies in the latter set of countries, is proof

enough of the impact systematic, quality VocEd can have on the economic status of workers and on the national economy in general. China too has been moving in this direction, and is therefore poised to make a huge transition from low-end mass manufacturing to playing a global lead role in high-end high-tech research and manufacturing in frontier areas of AI, robotics, autonomous and electric cars etc.

2.3 A corollary missed in NEP2019 is that professionals with Technical Education in India also lack adequate manual skills, which severely reduces their professional competence and also impairs their design-development and innovation capabilities in several sectors. This has also created a vast middle-class in India with poor manual and technical skills, even for simple household repairs and DIY tasks, dampening the skills and technical knowledge ecosystem in the country. India is perhaps the only country where renowned furniture maker Ikea, which elsewhere in the world sells furniture in the form of CKD kits, sells its furniture kits in India accompanied by skilled workmen from services aggregator UrbanClap to assemble the kits at the buyer's home, market study having taught Ikea clearly that middle-class buyers in India are incapable or unwilling to undertake the final assembly themselves! Therefore integrating VocEd in some form with tertiary education will be socially transformative too, especially as regards broad-basing what may be termed "technological temper" in India.

2.4 However, there are serious lacunae in many of the specific policy suggestions made in NEP2019 regarding VocEd that would run counter to the stated objectives, such as in:

- ❖ the design, duration, curriculum and institutional locus of VocEd 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 VocEd; and
- ❖ the role envisaged for high schools/secondary education in VocEd

2.5 This note offers some comments and suggestions in this regard in the hope that these would be taken seriously and incorporated in the form of modifications in the NEP2019. It would be a great pity if what has been put forward as a transformative policy frame for VocEd starts off on the wrong foot and, because of practical infirmities, is soon rolled back towards the current dysfunctional VocEd set-up.

3. VocEd in HEI and Secondary Schools

NEP2019 proposes that “the National Policy on Skills Development and Entrepreneurship (NPSDE) announced in 2015 specified that 25% of educational institutions would target offering vocational education. We make a major departure from this policy to specify that not just 25%, but *all educational institutions - schools, colleges and universities* - must integrate vocational education programmes in a phased manner” (emphasis added) (p.359) and that 50% of learners are covered by VocEd by 2025 (p.357).

3.1 This Note is in full agreement that all HEIs should offer VocEd, but strongly opposes VocEd in Secondary Schools (Classes 8-12) up to NSQF 1 to 4. In brief, this Note asserts that VocEd is a part of tertiary education, hence to be

conducted in HEI only, and has no place in the School system. This is explained in greater detail below. Subsequent remarks and suggestions in this Note regarding VocEd therefore assume that it is conducted in HEI only.

3.2 The idea that VocEd is conducted in all HEI is welcome, with the proviso that this covers NSQF 1-7 rather than only 5-7. This will ensure that VocEd is not walled-off in separate and “second class” trade institutions but is offered in normal HEIs, allowing for interaction with other disciplines and for actualizing student aspirations to migrate upwards to higher qualifications than they currently possess and to mainstream under-graduate/professional degrees and beyond, and at different stages of their careers.

3.2.1 It is further suggested that, whereas NEP2019 does not include Polytechnics and other such institutions offering education only upto Diploma level as HEI, Polytechnics should also be fully included in the VocEd ecosystem and encouraged to offer VocEd upto appropriate NSQF.

3.3 The idea in NEP2019 that VocEd would be conducted in all Secondary Schools (Chapter 20), with students receiving VocEd during Classes 9-12 in at least one Vocation covering NSQF 1-4 is completely untenable. Absurdly, NEP2019 even takes this a step further and suggests that students be provided foundational training in some Vocations in Classes 6-8 so as to enable them to make informed choices in Classes 9-12 (P.20.3)! This entire framework is a carry-over from antiquated past and present educational policies, and is a hangover from an earlier time when VocEd was viewed as an alternative stream in Secondary Schools to assist (read push) academically weaker or economically poorer students into jobs right after School with lower competencies and career

prospects than “normal stream” students. It is also directly contrary to the perspective articulated by NEP2019 elsewhere in Chapter 9 (which speaks of “more and more students aspiring to higher education” as “India moves towards becoming a true knowledge society and economy — and in view of the forthcoming fourth industrial revolution” — p.201), Chapter 16 on Professional Education (see especially P.16.1.3 and P.16.1.4) and Chapter 20 itself on VocEd, all of which make clear that the knowledge and skills deliverables expected from VocEd can only be obtained through HEIs. This is especially true in the very examples cited in NEP2019 of VocEd in Secondary Schools “in disciplines related to agriculture, law, technical and healthcare education” (P.16.1.5).

3.3.1 It should also be stressed that the modern, international experience and practice suggests that all students should complete full 12 years of School education. Academically weaker students may not clear all subjects, but would obtain whatever credits they are entitled to commensurate to their school leaving performance, allowing for subsequent completion of full 12th standard qualifications or subsequent mid-career entry into VocEd at HEIs at appropriate NSQF levels based on secondary school credits obtained and appropriate Recognition of Prior Learning (RPL) as per their work experience and any other educational qualifications.

3.3.2 Skill, crafts etc vocational training can and indeed must be offered in Secondary Schools Classes 9-12 as suggested in NEP2019 but at foundational level only, enabling students to gain insight into their aptitudes and preferences, build skills including towards future tertiary VocEd training and/or careers. Appropriate credits may also be awarded for this, and count towards RPL.

3.3.3 NEP2019 itself acknowledges that choices of subjects for VocEd would be limited in the Secondary School system, shaped by availability of skill training institutions nearby, jobs available locally and so on (p.359 & ff). Further, NEP2019 suggests (P.20.3) that VocEd students in Secondary Schools spend time in local industries etc gaining work experience, further detracting from academic achievement and prematurely forcing them into work environments. None of these are ideal ways for preparing young students to face the modern world of work, especially for equipping them with capacities suited for the demanding, knowledge- and tech-based contemporary and future employment scenarios.

4. VocEd Entry & Exit Points, Duration and Qualifications

NEP2019 proposes that HEIs would be empowered to offer vocational education “through Diploma, Advanced Diploma and B.Voc. degrees that are aligned with NSQF (National Skills & Qualification Framework) Levels 5, 6 and 7.” Firstly, of course, this should be extended to all NSQF levels 1-7. It is also not clear what duration these courses are intended to be. And the hierarchy of Qualifications, starting with a lowly Diploma and ending with the much vaunted Degree so highly prized in India, betrays a carry-forward of older concepts of education, superimposed onto VocEd, and does not match the vision of VocEd as a modern system of acquiring progressively higher knowledge and skills, especially as part of Life-Long Learning (LLL) for workers and professionals. There is therefore absolutely no need for a “B.Voc. Degree”

4.1 The main point under discussion here, however, is that just 3 Qualifications aligned with NSQF 5, 6 and 7 are not enough, and severely limits the scope of entry into and exit

from VocEd courses, especially in the context of upgradation of qualifications, re-skilling/re-training, and mid-career higher qualifications. Qualifications obtained through VocEd should be telescopic, enabling easy movement to higher qualifications at any stage of the student's career, and taking into account work experience and RPL. The highest VocEd qualification, along with work experience and RPL, should enable transition to full-fledged undergraduate academic or professional education and beyond. In this context, the NEP2019 suggestion that "the NSQF, and the equivalent of the NHEQF (QFs for Higher Education) for each of the professional disciplines, must be brought together to enable this," (P.16.1.6) is correct.

4.2 Courses of different duration, both full-time and part-time, day and evening, would require to be designed, allowing students to take a break from careers or attend VocEd courses while working as suitable. Full-time "Sandwich" courses of durations, varying from 18 weeks to 36 weeks for different NSQF levels and Qualifications, with the remaining period being spent in the work place, would also permit suitable employer sponsorships and/or study leave and could also be suitable for Apprenticeship programmes.

5. Curricula, Skill Development & Standards

NEP2019 suffers from considerable confusion regarding setting of curricula for VocEd Courses, linking with industry and Training Institutions for the skills component, and institutional responsibility for all these tasks.

5.1 NEP2019 states that "integrating vocational education poses additional challenges for academia. 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. Educational institutions will therefore have to develop considerable expertise to be able

to deliver on these expectations from them” (Chapter 20, p.360, emphasis added). This idea is reiterated in many other sections of NEP2019 too. HEI and other tertiary education institutions providing VocEd should not have to be answerable for employment opportunities after education. Broad VocEd Course structure, educational and skill standards, as well as curricula and expected knowledge/skills deliverables should all be specified by appropriate Higher Education/Professional authorities based on periodic assessment of industry and market demand updated from time to time. Institutes of manpower planning, industry associations and management institutes could also be brought into this process. At one time, the Planning Commission could have played a nodalizing role, but now that perhaps “planning” itself is a dirty word, maybe the Niti Aayog could conduct studies towards this end. In no other country are the HEIs made responsible for employment opportunities of VocEd students.

5.2 The above statement in NEP2019 is followed by a long to-do list for individual HEIs providing VocEd which includes liaising with ITIs, Polytechnics, Industry etc for skill-training etc, collaborating with National level institutions for VocEd and SCERT for training of VocEd teachers, curriculum preparation for VocEd courses etc. This is an unnecessary and in fact impossible task for individual HEIs which will collapse under this burden and also bring down the entire VocEd edifice. The co-ordination between the Skill Training component and the educational component of VocEd should be handled in a structurally integrated manner involving both MHRD and MSDE (Ministry of Skill Development & Entrepreneurship), so that the VocEd courses are planned

and implemented in an integrated manner covering both the Educational and Skills components.

5.3 In fact, NEP2019 completely over-burdens HEIs with responsibilities for VocEd 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. This is virtually calling upon HEIs to also act as ITIs with all the additional infrastructure, trainers etc., duplicating similar infrastructure Surely it makes more sense to strengthen both HEIs and Skill training institutions such as ITIs, Polytechnics etc, and working out an Institutional arrangement that would enroll students for VocEd simultaneously placing them at HEIs for the Educational component and Skill Training Institutions for the practical skills component. A District-level body set up and overseen jointly by MHRD and MSDE could handle student applications and enrolment at respective Institutions for both components of VocEd. Integration of VocEd with HEI, and Skills with Education, does not necessarily mean that both have to be done in the same institution! NEP2019 suggests setting up of an inter-ministerial National Committee for Integration of Vocational Education (NCIVE) (see Chapter 20). Although this sounds somewhat like kicking the can down the road, perhaps the proposed NCIVE could work out the necessary details.

5.4 Similarly, NEP2019 also burdens HEI with 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).” If each HEI prepares its own syllabus and curriculum for each VocEd course, this would lead to complete chaos. The same applies to the NSQF where NEP2019 requires that “course content and assessment criteria, and appropriate curricular and assessment frameworks will be standardised by academic institutions” (P.20.2.1).

Based on standards set as above, model syllabi, curricula and assessment frameworks should be developed by designated committees/bodies of MHRD and MSDE, leaving some freedom to individual HEIs to slightly modify these within specified limits, not affecting learning outcomes, to suit local employment needs and other conditions.

5.5 Incidentally, NEP2019 calls for close co-ordination between MHRD and MSDE, and all other ministries involved in providing skills training, “given the crucial role that mainstream academic institutions can play in delivering vocational education to millions of young Indians at the earliest” (P.20.1.5). Indeed, NEP2019 offers an excellent opportunity to revisit the very decision to constitute a separate Ministry for Skill Development & Entrepreneurship, guiding functions that earlier came under the Ministry of Labour. Both institutional arrangements perpetuate the very same “hard separation between vocational from academic and professional education” that NEP2019 bemoans at the very outset and therefore suggests a framework that integrates VocEd with academic/professional education. It is strongly urged that MSDE be once again brought as a Department under MHRD, whose very terminology of “human resource development” suggests an integrated approach to both skills and academic education.

12.

The Draft National Education Policy 2019 and the Social Counterrevolution

Archana Prasad¹

There is no doubt that education plays an important role in the quest for an egalitarian society, a dream that can only be fulfilled through the substantive transformation of the society. That this transformation will be anti-patriarchal in its character and content was recognised even in the last National Education Policy, 1986 (NEP 1986) when it stated: “Education will be used as an agent of basic change in the status of women. In order to neutralise the accumulated distortions of the past, there will be a well-conceived edge in favour of women. The National Education System will play a positivist; interventionist role in the empowerment of women... This will be an act of faith and social engineering” (p.6). This formulation clearly implies that merely education will not change the patriarchal system. Rather, the content of education has to be such that it addresses all forms of discrimination within the society.

From the perspective of women and women’s organisations, this objective of the National Education system, not only remains unfulfilled, but is crucial to the development of a secular consciousness that lays the foundation of a non-patriarchal society. The partial successes of such a transformational and emancipatory project can be attributed

¹ *Dr. Archana Prasad. Professor Centre for Informal Sector and Labour Studies, Jawaharlal Nehru University, New Delhi*

to significant struggles by the women themselves and also to liberal democratic vision that was a result of the Constitutional values that were agreed upon in the decades after independence. However, the developments of the last few decades have resulted in the growing influence of right wing and socially conservative forces in a neoliberal economic framework.

The connection between social conservatism and neoliberalism is important to understand because it provides an important explanation repeated assaults on the emancipatory project of the democratic women's movement. This is reflected in the increasing rates of violence against women, the growing commodification and stereotyping of women by the market economy, the reversal of several measures of social reform and aggressive advocacy against basic rights of women by politically backed obscurantists and the withdrawal of the state from the provisioning of social services and infrastructure. All these measures can together be seen as a social counter revolution which is bent on disrupting an ongoing emancipatory project. The DNEP, when placed in this context, needs to be interrogated on whether it will further or intensify the assault on the long-standing struggle for women's emancipation in Independent India.

FROM SUBSTANTIVE TO FORMAL EQUALITY

As mentioned earlier, the NEP 1986 did not address the problem of gender equality merely in terms of access of girls and women to school and higher education. In other words, improving access will not automatically lead to the weakening of patriarchal relations. This social reality is totally discarded by the DNEP, when it makes a case for the expansion of access to education without addressing its transformative content. For example, the increasing rate of enrolment of girls

at all levels of school education is seen as one of the biggest achievements of the post-Right to Education Act. But this does not necessarily imply that the environment for girl students has either become safer or that girl students have not been subjected to societal pressures that infringe their basic rights. Such a discrepancy between access and empowerment is not addressed by DNEP because of the following reasons.

First, the proposed policy subordinates the National Educational System to social and political power structures in a manner that is wholly unconstitutional in character. In the first place it replaces Constitutional values as the guiding principles of makes repeated references to local values and classical cultures of the pre-Islamic period. For the proposed policy, India is composed of a 'diversity of cultures' but the glory of these cultures is to be assessed through ancient achievements. At the outset, in its introduction, the document clarifies that the achievements of the Indian civilisation are a result of a culture of assimilation. It therefore implies that the dominant mainstream culture, represents a blend of all cultures since till the arrival of the British (p.26). This one-sided notion of Indian culture essential represents the evolved culture of the martial ruling classes, who in fact, stamped out all traces of alternative and heretical cultures which were the cradle of many a resistance even before the arrival of the British. In order to delegitimise this contention votaries of the policy may state that the document valorises and popularises Buddhist influence on Indian culture. Mission Nalanda and Taxashila are meant to be commemorative of the 'Buddhist' influence over Indian 'culture'. However, it must be remembered such a culture only developed under the patronage of the State and Great Empires and were known as the hubs of promoting Brahmanical Vedic scholarship.

Therefore, it is safe to say that the notion of 'culture' reproduced in the DNEP is in fact a dominant majoritarian

culture which is representative of the ruling classes. In their essence, such a culture justified the ownership and subordination of women, where women were to be dutiful to both the family and the nation on the basis of certain stereotyping of the pure and honourable woman. Hence the conception of the 'good' 'honourable' woman rooted in the dominant Indian heritage and is very much at the heart of the contemporary Hindutva project. In this sense the undercurrent in the DNEP is one which promotes anti-women political and social tendencies.

The above-mentioned theme is present in the second overarching emphasis of the DNEP on subordinating education to social and political institutions that will have overarching powers to decide the content and administration of schools, colleges and universities. The Policy will setup a centralised and unrepresentative Rashtriya Shiksha Aayog under executive control, that is the government of the day will have a full say in what type of education should be offered to the people. This will replace already existing representative bodies, many of whose powers and autonomy have been eroded over a long period of time. In other words, the complete dominance of a political stratum which consists of socially and economically powerful interests who are likely to influence the penetration of their own cultural values into the curriculum. More importantly, the narrow, but already existing spaces for women to influence the syllabus content are set to be wound up and replaced by nominated Board of Managements at different levels. It is also particularly important to note that the school complex management committees with limited representation from parents and women will have an adverse impact on the rights of parents. Though the school management committees make some appropriate noises about representatives of local self-government on committees, it is clear that the democratic deficit in the proposed structure has the potential to increase the influence

of socially powerful patriarchal forces on the education system.

Third, the proposed policy has no concept of equality as far as higher education is concerned. This is reflected in the fact that there is a singular bypassing and ignorance of any discussion on women's education at different levels of higher education and even the constitution of the Rashtriya Shiksha Aayog does not envisage a women-friendly structure. Rather it conceives of a structure which will make access to research and funding more difficult for women. The entire system of liberal education conceived has almost no mention of gender equality in it. The institutionalisation of women's studies in universities was a product of a long struggle by the women's movement. The presence of these centres of learning introduced new multi-disciplinary fields of teaching and research in an integrated way. The separation of teaching from research in the proposed institutional architecture of higher education is an implicit attack on programmes like women studies, social exclusion and comparative religion which play an important role in making the curriculum more socially inclusive and democratic in character.

Last but not the least, one of the biggest attacks on the idea of equality is that there is virtually no acknowledgment of the need for the constitutional provision of Reservations in the proposed policy. In fact, the policy speaks of 'underrepresented' groups as a substitute for historically deprived groups. It is important, that the category of 'underrepresented' is once again in line with the formalistic idea that access is equal to equality. For example, if the GER for women in certain courses is increasing at a very high rate, will young women be considered part of the 'underrepresented group' or not. Apart from the fact that this category has no constitutional protection, the presence of such a category will in fact make historically oppressed groups dependent on the whims and fancies of the socially and politically powerful

people who are likely to dominated the proposed institutional structure for the implementation of the Policy.

The points outline above clearly show that Policy does not envisage any interventions which can make education transformative and provide space to democratically minded women's organisations who are struggling for substantive equality. This is one of the major intended lacunae of the current proposed Policy.

LEGITIMISING DISCRIMINATION AND SECOND-CLASS EDUCATION

The informalisation of the education system is not a new tendency within the current political economy. Mass recruitment programmes like Sarva Shiksha Abhiyan paid more attention to increasing enrolments, rather than increasing public spending to develop a uniform quality social infrastructure for education. The result of this was the high jump in the enrolment of girls within school education since the enactment of the Right to Education Act (RTE). Though this achievement cannot be altogether discounted, the presence of low-quality infrastructure without adequate toilet facilities or safety measures ensured that girl children continued to face problems beyond enrolment in primary schools. Many schools also continued to have multi-grade classrooms and inadequate teachers. If a family was to choose between cheap government education and private education, they almost always ended up sending their sons to more well-endowed (and not necessarily better private schools) and whereas girls were enrolled in infrastructurally weaker government schools which were nearer to the home. Thus, the lack of a common school system has had a negative impact on the provisioning of quality education for girl children, even though their enrolment rates may have gone up. It is well

known that the best method of helping girl children to enroll and stay in schools is by introducing a neighborhood common school system imparting basic and free education. The RTE made this a right, whereas the DNEP proposals reverse the government's commitment towards expansion of educational infrastructure. The proposed policy categorically mentions that the guidelines for school under the RTE Act are too stringent and need to be relaxed. It proposes a relaxation of norms and multiple pathways to schooling, thus justifying sub-standard schooling. The presence of such sub-standard schools is dangerous as it will induce parents to enroll their girl children in non-acceptable forms of schooling. It will also reduce the government's commitment towards expansion of school infrastructure.

This is also reflected in the fact that the proposed policy relies on voluntarism and the National Tutor Programme and the Remedial Programmes to deal with problems of dropouts and disability. Through this programme the Policy envisages the involvement of the community volunteers who will work with the teachers. It is surprising that the Policy introduces this programme to plug the rising teacher-student ratio, instead of making a commitment to expand the recruitment of teachers. This introduction of a large-scale volunteer programme is a perfect way placing the entire education system at the disposal of the Sangh organizations and help in their outreach activities. In fact, rather than resolving the problem of drop outs, such a volunteer programme will further informalize education and place a constant surveillance on girl children. It will also push 32.2 percent of the girl students who have left school into an informal, sub-standard system of schooling. A further factor to note is that the predilections of the current ruling dispensation, voluntarism of these workers is likely to be marketed as a 'national duty' and used for furthering the political outreach of the ruling classes.

Thus, we see that the DNEP dilutes the commitment towards providing free and compulsory basic education to all children. The achievement of this aim is only possible if there is a neighborhood common school system for basic education which caters to all neighborhoods and households irrespective of their social and economic status. This is the best way of ensuring that all girl children receive quality education. The proposed Policy not only dilutes this objective but will also reverse the gains that have been achieved through a long process of struggle for strengthening public education. The girl children will bear the brunt of its consequences.

Education Not as a Right But as Charity for the Girl Child

It is well known that neoliberal policies of successive governments have severely curtailed funds for education. Several important schemes like scholarships for girls in regions with low literacy, the Rajiv Gandhi National Scholarships, scheme for Ashram schools etc., have suffered as a result of this. There has also been very little expansion of the school and university infrastructure. Hence it is obvious that any proposed policy needs to commit and expand public funding for education. It also needs to allocate funds for scholarships, transport and other facilities to encourage girls to stay in and seek higher levels of education. But far from doing this, the DNEP places the girl child at the mercy of philanthropists.

The DNEP notes that women need access to formal education to get “medium to high productivity jobs and attaining financial independence” (p.147). In order to achieve this objective, it proposes a Gender Inclusion Fund with two components: formula funding and discretionary funding. The formula funding will be given to state governments on the basis

of priorities set by the Central government (namely provisioning of bicycles, girls' toilets, and conditional cash transfers), whereas discretionary funds will be made available to state governments in a projectized mode to deal with local context and situation. In this context it should be noted that education is a State subject, and this pattern of funding will facilitate greater control of the Central Government over education. This change in the pattern of funding will only intensify the declining trend in public funds for women's education.

The above-mentioned fact should be seen in the context of the broader proposals for financing of education. One of the central features of the DNEP is that it puts the public and private education at par with each other. This means that no priority will be given to public institutions. Further expansion of public funding will be subject to high rates of growth and tax collection. The education fund will be augmented through private philanthropic funding which is also inclusive of CSR by the big corporates. This model of financing and notes that philanthropic funding will only make education subservient to patriarchal religious and social institutions on the one hand, and corporate interests on the other hand.

The DNEP prioritizes the corporate model of funding and a corporate style of management which will lead to an increasing privatization of education. It may be noted that the DNEP cannot be divorced from the context where student scholarships are being phased out and university hostel and tuition fees are being increased considerably. In order to solve this problem, the DNEP is putting emphasis on student loans. This strategy as it will put girl children at a disadvantage when parents with limited resources think of education. It will also put the students and their families in a debt trap and have a considerably negative impact on enrolment. In the light of this it is important that the governments renew and expand the

funding of public education, not least by taxing corporate profits, rather than giving tax benefits to corporates through the CSR route. But this policy is far cry from meeting this objective. In fact, the funding pattern it proposes will dilute the women's constitutional right to education.

EARLY CHILDHOOD CARE AND EDUCATION (ECCE) AND WOMEN WORKERS

One of the main proposals of the DNEP is to include ECCE in the system of education by amending the RTE Act. The proposal for introduction of early childhood education therefore needs to be planned in a more systematic way since it not only affects the future of girl children but also of multitude of women workers. While some movements have been demanding the inclusion of 0-6 years in education, under the pre-school system, the policy is totally unclear about how it is going to strengthen and treat the existing ICDS system, which focuses, both on cognition and malnutrition. By separating the two objectives, the DNEP downgrades the problem of nutrition in the ages between 0-6 years. Further it is important to note is that the direct linking of pre-school with primary schools will only make access more difficult for children and women. It is also not clear how the DNEP proposes to deal with 2.5 million Anganwadi workers and helpers who have been fighting for their rights for the last many decades. This aspect of education needs to be rethought by policy makers. It would be a welcome step if the State were to introduce a neighborhood crèche system for children from 0-6 years with the aims of improving cognition and addressing malnutrition. The Anganwadi workers and helpers should be regularized and absorbed under this system, which will help

solve problems of women workers and also address the concerns of sibling care.

The section on Foundational Learning says that nutritious food shall be provided to all children and that breakfast and lunch will be added to school through the introduction of scientific locally sourced diets. It is obvious that such a programme will impact the 4.5 million midday meal workers who have been fighting for their rights to be recognized as 'regular workers'. It is important that the legitimate demands of midday meal workers should be addressed by any Policy that argues for the expansion of the midday meal programme and it should be stressed that all meals are freshly cooked. Since the policy is itself relying heavily on voluntarism and outreach by 'social workers' for its implementation, it is unlikely that the long-standing demands of women workers in the early childhood programme are going to be met.

CONCLUSION

The preceding discussion has highlighted some aspects of the DNEP in relation to their impact on the rights of women students and workers. It has shown that the implementation of the proposed policy measures supports the forces of social counter revolution and become a major roadblock to further struggles of the women's organizations for building an egalitarian society. As has been stated earlier, one of the major aims of education should be to challenge and struggle against patriarchal consciousness within the society. The adoption of the DNEP will significantly weaken this objective by mobilizing socially conservative forces against such a project. It will also place women and girl children at the mercy of the community, corporates and the ruling classes as far as

their access to education is concerned. In this sense the DNEP will strengthen both, the socially conservative forces of neoliberalism and right-wing Hindu nationalism. It will also narrow the democratic space which is essential for the furtherance of the aims of the larger Women's Movement. It is therefore extremely critical that the democratic women's movement understand the full implications of this policy and join the struggle for strengthening the existing National System of Public Education.