



## **New Education Policy 2016**

### **Ministry of Human Resource Development (MHRD) Draft for Inputs**

#### **Comments & Suggestions from Azim Premji Foundation**

**August 2016**

- I. MHRD had placed a draft for inputs into the New Education Policy on its website and asked for comments on the document.
2. This is Azim Premji Foundation's response to the draft.
  - a. Section 1 has our one-page summary review of the draft.
  - b. Section 2 has our detailed section-by-section review of the draft - this includes additional/alternative suggestions to those in the draft.
  - c. Section 3 is a detailed bibliography of research on issues that have been mentioned in the draft.

### **Section I - Summary Response**

1. We have a Constitutional obligation to ensure quality universal education for our children. A strong public education system is a reaffirmation of our commitment to democracy - in many ways, public education is foundational to democracy. This draft must strongly and visibly **reaffirm the importance of public education** in our country.
2. The socio-economic environment has changed significantly since the last national education policy. But the fundamentals of education - its purpose and philosophy - remain constant. This draft must **reiterate the purpose of education** as a means of **individual empowerment and social change** to build a more democratic, inclusive and tolerant society.
3. This draft must place a much stronger emphasis on education based on the **values of the Constitution** with a special emphasis on **democracy, equity and inclusion**. The current focus on education to increase employability, skill development and entrepreneurship is completely inadequate.
4. The issue of privatization, its spread and challenges, is absent - this must be addressed head-on.
5. The draft has some good recommendations:
  - a. Extension of RtE to secondary school
  - b. Cadre for pre-primary teachers, teacher educators and school principals
  - c. Common standards of infrastructure, learning outcomes for government and private schools
  - d. Alternate schooling for children in difficult circumstances
  - e. Protection of the rights of children & adolescent education
6. But there are critical issues that need much sharper articulation or complete re-thinking.
  - a. This draft has a very weak response to the challenges of **pre-service teacher education**. At its core, education is the process between the teacher and the student. If education has to improve, teaching has to improve - there is no way around this. Teacher preparation in India needs a revolution - a full scale, grounds-up redesigning of the system, structures and operations – this policy should have been the beginning of that revolution.
  - b. There is hardly anything in the draft on **in-service teacher professional development**. The approach and structure of in-service professional development needs fundamental re-thinking. A new direction, philosophy, approach, principles, possible structures or institutional mechanisms for in-service teacher professional development should have been articulated.
  - c. The **National Council for Teacher Education (NCTE)** finds no mention. Improving teacher education is at the core of improving education in India and that needs a full scale, overhaul of the system. Such an overhaul needs a champion and not an ‘inspector.’ NCTE should either be the enthusiastic champion of this or should be disbanded.
  - d. **Teacher and head teacher accountability** is one of the most important and controversial issues in education. Decades of global experience clearly show that trying to establish such accountability by ‘tying to test scores of students’ has not only failed, but has caused damage to the education system. This draft seems to be repeating this mistake.
  - e. The **No Detention Policy (NDP)** is now an easy and convenient ‘whipping boy’, for many people. The claim that NDP has worsened things is simply untrue. Research from across the world confirms the view that detention solves little - children perceive the threat of grade retention as extremely stressful - it has a clear detrimental effect on social and cognitive development across the elementary years. No detention must continue till Class 8.
  - f. Two kinds of **Class 10 board examinations** is a poor idea which easily becomes a source of inequity. Basic common academic standards up to Class 10 are necessary for all children.
  - g. The section on **vocational streaming** seems like an option only for ‘poor’ or ‘poorly-performing’ students instead of being an integral part of a rigorous curriculum for all students.
  - h. On **higher education**, the draft must make strong recommendations on access in underserved geographies; curriculum, pedagogy and assessment; inclusion; institutional development and autonomy. It is largely silent on these issues.

## Section 2

### Review of Each Section - Detailed Responses & Alternative Suggestions

#### **Chapter 3 - Vision, Mission, Goals and Objectives of the National Education Policy**

##### **What the draft says**

##### **1. Vision**

The National Education Policy (NEP), 2016 envisions a credible and high-performing education system capable of ensuring inclusive quality education and lifelong learning opportunities for all and producing students/graduates equipped with the knowledge, skills, attitudes and values that are required to lead a productive life, participate in the country's development process, respond to the requirements of the fast-changing, ever-globalizing, knowledge-based economy and society.

##### **2. Mission**

- a. Ensure equitable, inclusive and quality education and lifelong learning opportunities for all - children, youth and adults - and to promote the realisation the nation's human potential to its fullest, with equity and excellence.
- b. Ensure that school and higher education as well as adult education programmes inculcate an awareness among children, youth and adults of India's rich heritage, glorious past, great traditions and heterogeneous culture, and promote acquisition by the learners at all levels of values that promote responsible citizenship, peace, tolerance, secularism, national integration, social cohesion and mutual respect for all religions, as well as universal values that help develop global citizenship and sustainable development
- c. Foster quality education with a strong focus on reforms relating to curricula, learning materials, pedagogic processes, learning assessment, teacher quality and performance, and institutional leadership and management with a view to enabling all students at all levels of education to attain the specified learning outcomes (knowledge, skills, attitudes and values) that are required to lead a productive life, participate in the country's development process, and respond to the emerging global challenges
- d. Promote acquisition by all learners of relevant skills, including technical and vocational skills, for work and entrepreneurship as well as skills and competencies that replace rote learning and allow them to be more creative and innovative, to think critically, to communicate effectively, to solve problems independently, and to be able to contribute to the national development process.

##### **3. Goals and objectives** - The overall goal is to foster quality and relevance of education and raise the credibility of India's education system, improve employability of the products of school and higher education system, ensure equitable access to education, from early childhood education to tertiary education, including technical and vocational education and training (TVET) as well as lifelong learning opportunities, and ensure that educational opportunities are available to all segments of the society. The main objectives of education for the fulfillment of the vision and mission are as follows:

- a. Expanding early childhood education services to ensure that all pre-school age children aged 4-5 years attain the learning and developmental readiness required for smooth transition to primary education, with particular attention to children belonging to disadvantaged population groups;
- b. Achieving universal elementary and secondary education and ensuring that all secondary education graduates have access to higher secondary education and all higher secondary education graduates have equitable access to higher education and that all enrolled students are supported to successfully complete their education with all of them achieving expected learning outcomes;
- c. Ensuring that all education programmes are made accessible, inclusive and responsive to the needs of diverse groups of children and young people with special focus on students from disadvantaged population groups, particularly children, adolescents and youth with special needs and with various forms of disabilities, and ensuring that all enrolled students are supported to enable them achieve the expected learning outcomes

- d. Ensuring that social, regional and gender gaps in education are eliminated and gender equality and girls' and women's empowerment are promoted throughout the education system*
- e. Expanding opportunities for skill development and ensuring acquisition by young people and adults of the skills and competencies for life and work, including technical and vocational skills that are required for employability, work and entrepreneurship and for adapting to an ever-changing world of work*
- f. Ensuring that young people (15-24 years) and adults (15 years and above) who are outside the formal education system, including those working in the informal sector of the economy, are provided with opportunities to attain skills for employability*
- g. Reform higher education system in order to ensure equitable access to tertiary education, including technical and professional education, narrow group inequalities in access to higher education, and improve teaching and research, promote innovation and generate new knowledge across all higher education institutions and to enable all enrolled to attain the specified learning outcomes and employable skills*
- h. Ensuring integration of information and communication technologies (ICTs) in education, especially for improving access to education, enhancing the quality of teaching-learning process, training of teachers, and strengthening educational planning and management.*
- i. Ensuring that the systems of teacher development and management, including continuing professional development of teachers, are reformed to ensure adequate supply of qualified and competent teachers who possess the prescribed competency profile and the prescribed professional standards for teachers*
- j. Ensuring that at all youth and at least 90% of adults, both men and women, achieve literacy and numeracy skills prescribed by the adult education programmes*
- k. Institutionalising a responsive, participatory and accountable systems of educational planning, governance and management and ensuring that the educational planning and management practices structures for the planning and management of the education sector at the national, sub-national and local levels are improved and made more responsive to the emerging educational priorities and demands of the expanding education sector*
- l. Professionalising and enhancing the capacity of institutional leadership, and ensuring that the leadership in the education sector at the national, sub-national and institutional levels are improved to respond to the emerging educational priorities and demands of the expanding education sector*
- m. Ensuring increased and well-targeted financing for educational development programmes.*

*The direction of the future education agenda is anchored in a lifelong and sector-wide perspective. The policy envisages broadening the scope of education to facilitate various pathways to learning depending on learners' choice and potential and in relation with skills required for the world of work while ensuring recognition and certification of learning outcomes acquired by learners through formal and non-formal learning modalities, including open and distance learning modes.*

### **Our response**

The vision, mission and objectives of the policy have been articulated very clearly - there is a strong emphasis on education to increase employability, skill development and entrepreneurship. This is an interesting contrast with earlier National policies which strongly emphasized national integration, promoting democracy, tolerance as important goals of education system. Increasing the relevance, credibility, and performance of the education system to increase employability, skill development and entrepreneurship is the important focus.

Democracy, equity, inclusion are given space but the tone is one of an afterthought. The Constitution is referred to but almost in passing. Inclusion is almost entirely seen in terms of enrolment and little else.

The issue of privatization, its spread and challenges, is conspicuous by its absence.

There is a big focus on learning outcomes, skill development, monitoring, management and accountability - with nothing much on autonomy and building capacity.

We have a Constitutional obligation to ensure quality universal education to our children. It is, therefore, critical to strongly and visibly reaffirm the importance of public education in our country. At its core, this is a reaffirmation of our commitment to democracy - in many ways, public education is foundational to

democracy. In the thirty years since the last national education policy was formulated, the socio-economic environment in India and the world around has changed significantly. Access to education at different stages has increased dramatically along with important curricular reforms. However, equity in and quality of education still remain a big challenge. Even though contexts have changed, the fundamentals of education - its purpose and philosophy - as a means of individual empowerment and social change to build a more democratic, inclusive and tolerant society - have remained constant.

The purpose of education is to facilitate the development of autonomous individuals capable of independent thought and action. This capability must lead to the realization of each one's role in social processes and contribute to material sustenance. Education, thus, must empower individuals to develop both individual capacities (independent and critical thinking, creative abilities and skills for material sustenance) and social capacities (empathy, resilience, work-ethic, an ethical compass).

Education and society are inextricably linked. Our Constitution envisions a democratic, secular, just and equitable society. Education must help to make society move towards this vision of equity, justice, inclusion, economic dynamism, sustenance and a true democracy. Indian society is stratified along caste, class and gender lines resulting in unequal power relations. Education must challenge the existing power relations and hierarchies, be a means of social change and not reproduce unequal power relations.

Education should not socialize individuals in rigid and 'given' societal roles and norms. It must enable individuals to question them and help create a more inclusive society. The role of education for social change must be reflected not only in access to educational institutions and opportunities but also in the micro learning processes. Curricular practices must be based on the values enshrined in the Constitution (e.g. social justice, equality and secularism) and educational institutions must be seen as 'inclusive' spaces. Our approach to education must be based on the deep conviction that every child is capable of learning. Children learn best when they are respected, valued and involved in the learning process. They learn in a variety of ways (through experience, experiment, exploration, conversation, discussion, movement, questioning, listening, speaking, reading, writing, thinking, reflecting, creative expression, conflict, resolution of problems etc.); often learn better and more easily from their peers. Good classrooms have room for voicing children's thoughts, curiosity, and questions. Every child learns at a different pace - different children respond to same situation differently and the same child may at different times respond differently to similar situations. Good health and physical development is very important - it helps emotional and cognitive development in children. Care is central to a good learning environment.

Education is a complex process influenced by individual, social, political, economic, cultural and environmental diversity. It is often difficult to establish a direct and persistent correlation between input and output or offer assurance of either scalability or repeatability of best practices. Any one-size-fits-all approach is unlikely to work primarily due to the dichotomy that exists between the need to meet unique individual requirements and social good.

### **Our Suggestions**

- I. The goals of this education policy could be articulated as the following:
  - a. Equitable Access (by 2030)
    - i. Vibrant public education system that serves at least 80% of school-going children
    - ii. All children in school (100% access) – universalization of early childhood, elementary, secondary and higher secondary education
    - iii. Access to high quality higher education with a focus on remote geographies and educationally backward districts
  - b. Equitable Quality (by 2030)
    - i. Schools demonstrate inclusive academic and operational processes based on the values of the Constitution and in line with principles of child development
    - ii. Classroom processes encourage conceptual understanding, critical thinking, creativity and collaboration

- iii. 70% of students have grade-appropriate learning competencies; all students show physical, emotional and ethical development appropriate to age/ability
  - iv. Higher education programs prepare graduates with competence and integrity
  - v. New knowledge is generated through rigorous research
- c. Enablers (by 2020)
- i. High quality teachers are available in every educational institution
  - ii. High-quality infrastructure and resources are available in every institution
  - iii. Institutions function within an enabling and participative culture that provides for both autonomy and accountability

## **Chapter 4 – Policy Framework**

### **4.1. Pre-school**

#### **What the draft says**

- 4.1.1 *As a priority, a programme for pre-school education for children in the age group of 4 to 5 years will be implemented in coordination with the Ministry of Women and Child Development*
- 4.1.2 *Presently, the Anganwadis under the ICDS are not adequately equipped to provide pre-school education. To strengthen the pre-school education in Anganwadis, steps will be taken in consultation with states to frame curricula and develop learning materials, within a year, and provide training to Anganwadi workers*
- 4.1.3 *State Governments will prepare cadres of pre-primary teachers, and create necessary facilities for their pre and in service training. The transition from Anganwadi to pre-primary school will be gradual and seamless, and it should be left to each State to determine the time frame for achieving it.*
- 4.1.4 *In due course, all primary schools will cover pre-primary education. For this, efforts will be made to locate all Anganwadis either in the school premises, or as close to these as possible.*
- 4.1.5 *Appropriate regulatory and monitoring rules and mechanisms will be designed for private pre-schools*

#### **Our Response**

The policy framework recognizes the importance of early childhood education and recommends its implementation has a priority in coordination with Ministry of Women and Child Development.

However, given the criticality of early childhood education, it should be a 'right' and not just a priority. Evidence from research across the world indicates that early childhood (0-6 years) are critical for the growth and development of children. Studies on the impact of investment in ECE have demonstrated that the economic return on early interventions is high. In countries with better performing education systems like Finland, pre-school education is the subjective right (if the parents so desire) of all children from the age of 5 years.

In India, almost 50% of children in the age group of 3 to 6 years are catered to by the Integrated Child Development Services (ICDS) scheme. A fairly large percentage attend private pre-schools which have mushroomed in the country. However, in spite of government and private initiatives a large percentage of children are still not attending pre-school. While the ICDS anganwadis follow a minimalistic approach to preschool education, the majority of programs in the private sector are downward extensions of the primary curriculum emphasizing on skills for reading, writing and numeracy in a mechanical manner, without sufficiently attending to the developmental needs of children in this age group. The unregulated nature of the field and the lack of higher education programs for educators, researchers and policy planners of young children impact the overall quality of the field.

Given the experience of poor implementation of pre-school education in India and the criticality of early childhood education, it should be the right of all children from the age of 4 to have access to quality pre-school education.

### **Our Suggestions**

1. Extend RtE to Early Childhood Education
2. Early Childhood Education should be part of the mandate of Ministry of Human Resource Development (MHRD) and linked with primary education - structure, curriculum, teacher development and child tracking
3. The National Early Childhood Care and Education (ECCE) Policy including the National Curriculum Framework and Quality Standards for ECCE should be made applicable across States - to government and private institutions
4. ECE teachers should be professionally-qualified and treated on par with other Government school teachers

## **4.2 Protection of Rights of the Child & Adolescent Education**

### **What the draft says**

- 4.2.1 *A framework and guidelines for ensuring school safety and security of children will be developed and will be made a part of the eligibility conditions for a school education institution for recognition and registration. Every Principal and teacher will be made aware of the provisions of the relevant Acts, Rules, Regulations, etc. relating to child rights and what constitutes their violation of by including a module in the teachers education/ training programmes and refresher courses*
- 4.2.2 *The Adolescent Education Programme and National Population Education Programme will be integrated into the curriculum of schools in a phased manner.*
- 4.2.3 *Adolescent Education will be included in pre- and in-service training programmes of secondary school teachers*
- 4.2.4 *Self-learning online programmes on child rights will be developed for the benefit of students, teachers and parents*
- 4.2.5 *Schools will engage trained counsellors to confidentially advise parents and teachers on adolescence problems faced by growing boys and girls.*

### **Our Response**

This is an excellent section. Safety and security of children in school is critical. Safety and psychological/emotional well-being of children has been a low priority in our education system. Across the country, in all kinds of schools, children are routinely exposed to various forms of physical and emotional abuse, often in the name of 'discipline.' Even though corporal punishment is banned, there are enough instances of children being beaten, subjected to humiliation, harassed and sexually abused. A safe and inclusive school space provides an enabling environment for quality learning within the school.

### **Our Suggestions**

- I. Create guidelines and processes for ensuring physical and emotional safety in schools including prevention of sexual abuse
  - a. Ensure that children feel safe enough to take intellectual risks, make mistakes, experiment and freely express their opinions without the anxiety of being ridiculed, reprimanded or punished
  - b. Confidentiality of sensitive information (regarding a student's background and circumstances) should be maintained
  - c. Threat/physical punishment should not be used
  - d. Inequity on the basis of caste, gender, socio-economic conditions, physical characteristics or performance of children should not be tolerated
  - e. Bullying, harassing, intimidating and use of derogatory or demeaning language with or by children should be strongly discouraged
  - f. Integrate education for sexual and reproductive health into the curriculum



problem-solving, critical thinking and reasoning skills are critical to improving quality of learning. Examination reforms will not only improve learning outcomes but also transform the teaching–learning processes. Learning needs to be viewed comprehensively. It cannot be restricted only to cognitive development but must encompass physical, emotional, social and spiritual development. Schools as formal institutions of learning are responsible for providing appropriate learning opportunities for comprehensive development of learners. Thus learning indicators/outcomes need to be defined comprehensively covering scholastic and co-scholastic aspects.

Student learning outcomes at all stages of education in our country have remained well below expectations. Board examinations do not assess the achievement of curricular goals and are also a source of stress and fear among students and their families. Continuous and comprehensive evaluation (CCE) has challenges in conceptualization and implementation - it has largely been mutated into a process of format filling. For any system of assessments to be meaningful it must be aligned to curricular goals - these goals and expectations must be clearly understood by teachers and learners. Improvement in student learning outcomes over the long run will require (i) ensuring all schools have a full complement of subject teachers and, (ii) fundamental changes in the approach to teaching and learning in the classroom.

**No detention policy:** There is no evidence from research that detention leads to improved learning. In fact, experience from around the world suggests the reverse - that the threat of failure causes fear and leads to drop-outs especially of students from disadvantaged backgrounds. Children in middle school are vulnerable in many ways and the chances of drop-out remain high. The No Detention Policy should remain as it is- till class 8. The onus of creating a positive learning environment should stay with the school until the elementary years are over.

### Our Suggestions

1. Define comprehensive benchmarks of student learning for each stage of education
  - a. These benchmarks must be based on the national and state curriculum frameworks which build on aims of education articulated in the national policy on education
  - b. These benchmarks should be ‘comprehensive’ – i.e. they should include the so-called ‘non-cognitive’ and ‘co-curricular’ areas which draw from the aims of education
  - c. Ensure syllabus, text books and teaching learning materials are aligned to these benchmarks
2. Make available exemplar tools and processes for assessment aligned to the benchmarks
  - a. Assessment tools and processes must be based on the nature of each subject, curricular objectives and age-appropriateness of the modes involved
  - b. Benchmarks and allied tools and processes must be developed in consultation with teachers
3. Build teacher capability in the area of assessment (Assessment Literacy)
  - a. In-service Training: Incorporate understanding of assessment, connection to the nature of subjects, its aim and perspective, pedagogy – talking about assessment outside of subjects reaffirms the myth that assessment is divorced from teaching-learning.
  - b. Pre-service Training: Student teachers need experience a range of assessments in their classrooms instead of learning about it in theory alone.
4. Empower teachers to design classroom pedagogy, choose curricular material and select assessment processes
  - a. Make pedagogy and assessment processes focus on achievement of curricular objectives
  - b. Emphasize formative assessments as highlighted in the policy of continuous comprehensive evaluation (CCE)
  - c. Provide autonomy for teachers to use a variety of modes and methods for assessment including self-assessment and peer assessment
5. Implement Continuous and Comprehensive Evaluation (CCE) in its true spirit
  - a. Ensure that an appropriate teacher pupil ratio is in place to implement CCE
  - b. Stop frequent testing in the name of continuous evaluation – replace it with equally rigorous classroom processes that assess learning without ‘testing’

- c. Design qualitative parameters for grading - the system of grading should be based on objective parameters of quality, aligned to the curricular goals of the subject – conversion of marks into grades is not of much use
  - d. Create student profiles/portfolios
    - i. These can be created based on student performance through the year in all areas of learning - scholastic and co-scholastic
    - ii. Such portfolios providing details of students' abilities would complement the exit examinations and in turn reduce the stress of such examinations.
6. Re-design School-leaving Examinations
- a. Test for analytical ability, conceptual thinking, problem solving and creativity – align the examinations to curricular goals
  - b. Design the tools and processes with rigour – test for validity and reliability
  - c. Ensure transparency in processes - availability of marking schemes, students' access to corrected papers, greater/speedier possibilities of rechecking
7. Use standardized assessments only for evaluating systemic health, and not for labelling/grading/ranking individual schools or learners
- b. Conduct sampled learning assessments to check overall 'health' of the system
    - i. These can be done every 3 years at the District/State level - these assessments must be aligned to the national curricular standards/framework
    - ii. Utilize the findings for systemic improvement e.g. curriculum planning and development, teacher recruitment and development etc.
  - c. Organize institutional audits/systemic assessments/accreditation - They can help develop a culture of accountability if they are rigorous, fair and intended for development and not punishment

#### 4.4 School Education

##### **What the draft says**

- 4.4.1 *Each State will undertake a detailed exercise of school mapping to identify schools with low enrolment and inadequate infrastructure. Wherever possible, efforts will be made to convert existing non-viable schools into composite schools for optimum utilization of human, physical and infrastructural resources, better academic performance and cost effective management. When schools are merged they could be located in a single campus. In consultation with the states, common guidelines for merger and consolidation would be evolved, without diluting the provisions of the RTE Act. The consolidation will enable the country to achieve one class – one teacher norm in a foreseeable future*
- 4.4.2 *The issue of extension of Clause 12 (1) (c) of RTE Act to government-aided minority institutions (religious and linguistic) will be examined in view of larger national commitments towards the economically weaker sections.*
- 4.4.3 *The State will endeavour to extend RTE up to an appropriate age so as to cover secondary level education.*
- 4.4.4 *Minimum standards for provision of facilities and student outcomes across all levels in school education will be laid down*
- 4.4.5 *Kendriya Vidyalayas (KVs) and Jawahar Navodaya Vidyalayas (JNVs) will be expanded and Kasturba Gandhi Balika Vidyalayas (KGBVs) will be expanded and upgraded, wherever possible, up to secondary level with priority to relatively educationally backward areas. Reasons for the success of JNVs will be studied and replicated by the States*
- 4.4.6 *Open schooling facilities will be expanded to enable dropouts and working children to pursue education without attending full time formal schools.*
- 4.4.7 *Students are many times faced with dilemma in making the right academic choices based on their aptitude and interests which results in failure to realize their true potential resulting in poor achievement,*

*disappointment and stress. Academic aptitude tests will be conducted at various stages to assist students in identifying their true potential and areas of interest. Helplines will be set up and professional counsellors will be engaged in schools to overcome this limitation and also identify children with special learning needs, assist slow learners and underachievers, help in right choice of courses including vocational skill-based programs, and guide secondary and higher secondary students about relevant employment opportunities*

### **Our Response**

School consolidation is a welcome step and will help schools to become pedagogically viable. Extension of RtE to secondary school is a necessity. Extension of KGBVs to the secondary stage is an excellent idea. Policy and decisions on school consolidation need to be based on the consequences of the demographic transition that will change the number and location of school going children. There are several geographies where small schools are necessary - alternatives need to be considered in such situations. All schools should be mapped using GIS in conjunction with the distribution of school age population and geographical constraints, to determine the optimal location for the new and upgraded schools. The reasons of success of KVs and JNVs should be studied and replicated all government schools. They should not be extended in the current form creating islands of excellence and further inequities in the existing government school system.

### **Our Suggestions**

1. Make the current norms for school access flexible to meet local needs and demographic change without compromising equity
  - a. Schools must be well-resourced in terms of number of children, adequate teachers and learning resources to enable meaningful pedagogy
  - b. Rationalize schools thoughtfully based on population, geographical terrain and safety with the caveat that proximate access in the early years is critical - common norms are not possible given the differences across states
2. Convert existing stand-alone schools into composite schools
  - a. from ECE to Class 12 or
  - b. from ECE to Class 8 and from Class 9 to Class 12 or
  - c. from ECE to Class 3; Class 4 to Class 8 and Class 9 to Class 12 in geographically difficult areas - these schools could be part of a composite school complex with a secondary school located at one place and multiple feeder elementary schools - all are together seen as one unit in terms of leadership and resources
  - d. If multi-grade classrooms are inevitable in the transition phase, they should be part of curricular design
  - e. PTR needs to be calculated at school level and not district/state level
3. Ensure availability of a full complement of subject teachers with an appropriate teacher pupil ratio at every school
4. Ensure adequate infrastructure (classrooms, libraries, laboratories, clean drinking water, separate toilets for girls and boys etc.)

## **4.5 Curriculum Renewal and Examination Reforms**

### **What the draft says**

- 4.5.1 *Curricular reforms will be carried out to meet the emerging aspirations and align to national goals of social cohesion, religious amity and national integration. Curriculum should be outcome-based and aim for overall development of students through imparting life-skills in an increasingly technology driven environment. All students will be taught both fundamental duties and rights so that they can become responsible citizens both within the country and in the world.*

- 4.5.2 *National Council of Educational Research and Training (NCERT) will undergo a re-orientation to address issues of deteriorating quality of school education and periodic renewal of curricula and pedagogy to move from rote learning to facilitate understanding and encourage a spirit of enquiry*
- 4.5.3 *For science, mathematics and English subjects, a common national curriculum will be designed. For other subjects, such as social sciences, a part of the curricula will be common across the country and the rest will be at the discretion of the states.*
- 4.5.4 *From Class V onwards, digital literacy will be introduced in the curriculum in a graded manner. However, ICT as a subject can start from class VI. ICT curricula at all levels will be revised to make these application oriented.*
- 4.5.5 *It is well recognized that concepts of science are best understood by students through demonstration and lab experiments. Hence for teaching of science subjects, practical components will be introduced gradually from class-VI onwards.*
- 4.5.6 *Issues of gender, social, cultural and regional disparities, with an emphasis on unity in diversity, will be properly addressed in the curriculum and its transaction. Curriculum will cover the issues of social justice and legal measures in order to avoid social discrimination. It will be ensured by the curriculum and text book development agencies that text books promote harmony and do not contain any discriminating issues/ events/ examples in the context of gender, disability, caste, religion, etc. Citizenship education, peace education, character building, legal and constitutional literacy, financial literacy, environmental sustainability and other common core which will be promoted through all the subject areas.*
- 4.5.7 *Examinations will be designed to test wider awareness, understanding and comprehension and higher order problem solving skills, and not merely ability to reproduce text book material. Continuous assessment, standards in paper-setting, transparency in evaluation criteria, etc. are some steps that can be taken in this direction.*
- 4.5.8 *In order to introduce flexibility and reduce year-end examination stress, the government will make an attempt to introduce on-demand board examination.*
- 4.5.9 *High failure rate in class-X examination is attributed to a large extent to poor performance in three subjects: Mathematics, Science and English. In order to reduce the failure rates, class X examination in Mathematics, Science and English will be at two levels: Part-A at a higher level and Part-B at a lower level. Students who intend to join courses/ programmes for which science, mathematics or English is not a prerequisite or wish to shift to vocational stream after class-X will be able to opt for Part-B level examination*
- 4.5.10 *At present Central and State Boards of Education conduct examination for class X and XII. It will be mandatory for the students to take class X board examination conducted by the Board to which their school is affiliated. class X Board examination will cover the entire syllabus of class X.*
- 4.5.11 *There are wide variations in the quality and value of certificates provided by different boards, representing different levels of learning. Moreover, there are allegations of many examination boards granting grace marks to artificially inflate the pass percentage. Not only that this practice needs to be discontinued, but a system should be developed to provide a better comparative idea of students' achievement levels across the boards and preferably across the years. Scaling is one alternative. Some other alternatives are conducting a central examination at the end of class-X and XII, or, expressing the scores in terms of percentile in each Board. All possible options will be studied by a team of academic experts to suggest a solution to indicate achievement levels of students of students*
- 4.5.12 *Procedural reforms will be undertaken, such as, doing away with migration certificate, school leaving certificate, etc. in order to encourage mobility of students from one institution to another.*

### **Our Response**

Curriculum reforms will not be meaningful without building teacher capacity in subject and pedagogy and designing classroom processes that enable conceptual understanding, creativity or collaborative learning. The examination reforms suggested do not meaningfully address the purpose of assessment nor the current challenges of the assessment. Streaming in Class 10 (5.8) is a poor idea - streaming of this kind

very easily becomes a source of inequity. Poor or poorly performing children are pushed into these choices by a system that is unable or unwilling to support them. Basic common academic understanding up to Class 10 is necessary for all children. Difficulties with subjects can be set right by a good curriculum and classroom process. Exceptions can be made for children with specific learning challenges that have been identified through a rigorous process

### **Our Suggestions**

1. Develop National and State Curriculum Frameworks for School Education (from Early Childhood to Higher Secondary) once every ten years
  - a. Align curricular frameworks to the values of the Constitution - democracy, equality, justice
  - b. Curriculum should be flexible and inclusive, reflective of diverse local culture and knowledge
  - c. Incorporate creative arts, crafts and oral expression, especially those rooted in indigenous knowledge and skill systems into the curriculum
  - d. Focus on planning and reflection in preparation for teaching
2. Ensure that students are offered a variety of learning experiences to help meet their curricular goals
  - a. Encourage active learning through school and classroom processes that facilitate dialogue, thinking and expression in an environment that is physically, emotionally and intellectually safe
  - b. Focus on the arts, drama, music and sports as an integral part of the curriculum – ensure that there is no ‘hierarchy’ of subjects (e.g. music is as important as mathematics)
  - c. Use the home languages in the early years of school education
  - d. Use learning material beyond the textbook - use the local language and local resources in teaching especially during the early years
  - e. Use pedagogy that reflects current research on how children learn
  - f. Design ‘learning support programs’ through the year for children who need help to cope with grade-level competencies
  - g. Promote gender inquiry through the curriculum
3. Create a shared understanding of learning objectives among teachers and students
  - a. Develop a framework of curricular standards/benchmarks across school education
  - b. Align resource materials (textbooks, workbooks, etc.) to these standards
  - c. Goal of learning should be to meet the curricular objectives rather than ‘completing’ the syllabus
4. Design a framework for “comprehensive” assessment
  - a. Comprehensive assessment includes the so-called ‘non-cognitive’ areas which draw from the aims of education
  - b. While a lot has been said about this, there is no shared/articulated understanding of the same
5. Design tools and processes for assessment appropriate to each subject/stage of education
  - a. Assessment tools and processes must be based on the nature of each subject, curricular objectives and age-appropriateness of the modes involved
6. Implement continuous and comprehensive assessment in its true spirit
  - a. Instead of frequent testing of students; teachers need to provide clarity to students on the range of skills and abilities that the curriculum emphasizes on
  - b. This can be made possible through deeper understanding of curricular objectives of different subjects and honing the teachers’ skills in designing a variety of assessments
7. Design qualitative parameters for grading
  - a. The system of grading should be based on objective parameters of quality, aligned to the curricular goals of the subject – conversion of marks into grades is not of much use
8. Create student profiles/portfolios
  - a. These can be created based on student performance through the year in all areas of learning - scholastic and co-scholastic.
  - b. Such portfolios providing details of students’ abilities would complement the exit examinations and in turn reduce the stress of such examinations.

9. Empower teachers to design classroom pedagogy, choose curricular material and select assessment processes
  - a. Make pedagogy and assessment processes focus on achievement of curricular objectives
  - b. Emphasize formative assessments as highlighted in the policy of continuous comprehensive evaluation (CCE)
  - c. Provide autonomy for teachers to use a variety of modes and methods for assessment including self-assessment and peer assessment
10. Re-design School-leaving Examinations
  - a. Test for analytical ability, conceptual thinking, problem solving and creativity – align the examinations to curricular goals
  - b. Design the tools and processes with rigour – test for validity and reliability
  - c. Ensure transparency in processes - availability of marking schemes, students' access to corrected papers, greater/speedier possibilities of rechecking

#### 4.6 Inclusive Education and Student Support

##### What the draft says

- 4.6.1 *Issues of gender, social, cultural and regional disparities, with an emphasis on diversity, will be properly addressed in the curriculum and its transaction. Curriculum will cover the issues of social justice and harmony and legal measures in order to avoid social discrimination.*
- 4.6.2 *Pre-vocational oriented activities will be infused in the curriculum from early stages to develop positive attitude towards dignity of labour and develop skills in children*
- 4.6.3 *With the objective of encouraging merit and promoting equity, a National Fellowship Fund, primarily designed to support the tuition fees, learning materials and living expenses for about 10 lakh students will be created. The scholarships from this fund will be made available to students belonging to the economically weaker sections. A separate national talent scholarship scheme, covering all subject areas, for meritorious students of all categories selected through a national level examination after class 10 will be introduced.*
- 4.6.4 *Ways of building synergies and linkages, providing mentoring and advice between Ashram shalas and nearby secondary schools/ higher secondary schools/ Kendriya Vidyalayas/ Navodaya Vidyalayas will be worked out.*
- 4.6.5 *Skilling of students in tribal areas needs greater focus and steps will be taken to offer more skill based courses in schools after regular working hours in coordination with National Skill Development Corporation.*
- 4.6.6 *Experience has shown that tribal children have difficulty in understanding and learning in the regional language which is usually the medium of instruction. To overcome this impediment, steps will be taken to ensure that, wherever required, multi-lingual education will be introduced*
- 4.6.7 *Special interventions will be undertaken to meet the educational needs of differently abled children and children with learning disabilities who are facing multiple problems of social neglect, absence of support systems in the home, inadequate and lack of appropriate facilities and assistive devices, particularly in schools located in smaller towns and villages.*
- 4.6.8 *The ongoing centrally sponsored schemes for children with special needs will continue and their coverage and funding will be augmented. A suitable mechanism will be developed at the State and district levels for oversight of the implementation of various schemes as well as identifying and providing for children with special needs.*
- 4.6.9 *At the local level, a part-time sub-committee of experts comprising of child and clinical psychologists will be constituted so that any school or District Education Officer could refer cases where a third-party assessment or advice is needed. This sub-committee can also advise on special training/orientation of teachers for sensitive and appropriate handling of children with special needs.*

- 4.6.10 *The Central Government will take the lead in devising a long term plan for addressing the problem of learning disabilities, provide investment in research and training and make available necessary resources.*
- 4.6.11 *The critical stages in the learning periods of the disadvantaged children from socially and economically disadvantaged sections will be supported with extra remedial coaching or advisory facility.*
- 4.6.12 *Education of migrant children through provision of residential school facilities at the source or destination of migration or any other suitable means, on the basis of equal opportunity and non-discrimination will be carried out*
- 4.6.13 *A zero tolerance approach on gender discrimination and violence will be adopted. The State will endeavour to enhance induction, retention and substantive presence of women in the higher education sector through various kinds of affirmative action. For this, greater efforts will be made to ensure the placement and recruitment of women in the higher echelons of university administration.*
- 4.6.14 *There will be dedicated funds for R&D to strengthen disability studies in higher education. Social and research audit of disability access for infrastructure, academic access and performance will be undertaken.*
- 4.6.15 *To address regional imbalances, differentiated policies for different terrains, such as, hill areas, tribal areas, desert areas, coastal areas, is possible. The criteria for determining educational backwardness at block and district levels will be revisited and new norms will be evolved. To identify educational and skill gaps and to facilitate special interventions for educationally backward regions as also for socially, economically and educationally backward sections, district-wise mapping will be undertaken.*

### **Our Response**

We are in agreement with the most of recommendations. However, suggestions made for the support of students from tribal communities, or economically and socially backward communities should be made available for all students who need support irrespective of their caste, class or community. Skill development should be for all students and not just tribal children, else it has the potential to become another axis of inequity. For inclusion to be meaningful, it is important to build leadership and teacher capacity to facilitate a culture of inclusion and collaborative learning in the school and classrooms.

Schools must demonstrate inclusive academic and operational processes based on the values of the Constitution and in line with principles of child development. Schools that function as learning institutions respecting the socio-cultural diversity of students, the context of the community and strive towards creating a shared vision of education in the ecosystem are able to create an environment conducive for learning. Evidence from research shows that the schools often reproduce and reinforce socio-economic stratification along the lines of caste, class, religion, gender and ability. School culture and processes are marked by exclusion for many disadvantaged groups and children with special needs are rarely able to access regular schools due to both physical and pedagogical barriers. Links between school, home and community are often weak and this translates into teaching processes that are neither contextual nor effective for learning.

### **Our Suggestions**

1. Ensure all children learn in a safe and stimulating environment
  - a. Remove barriers created by admission procedures (screening, identification, parental interaction, selection and evaluation)
  - b. Classroom processes should be flexible and inclusive reflective of diverse needs
  - c. Make the school time table/calendar suit the needs of the children and local community
  - d. Ensure heterogeneity in seating arrangement- discourage seating arrangements on the lines of gender, caste, class, religion or learning levels
2. Support inclusion of students with special needs
  - a. Ensure barrier-free environment and access to curricular resources for all students with special education needs
  - b. Make support services available in the form of technology (including ICT), teaching-learning materials and specialists

- c. Make sign language the language of instruction for the hearing impaired and Braille for the visually impaired – ensure resources are available for every child in need
  - d. Strengthen the inclusive education program at the Block level with adequate people and resources
  - e. Include education for students with special needs as a focus area in pre-service teacher education
  - f. Adapt the regular curriculum for students with special needs
  - g. Link the work of the Rehabilitation Council of India with the Ministry of Human Resource Development
3. Strengthen linkages between educational institutions and the community they serve
- a. Engage with local government and Panchayati Raj institutions
  - b. Understand local/indigenous knowledge - make it part of the learning process
  - c. Strengthen student alumni associations and SMCs
4. Build a collaborative and inclusive school culture
- a. Create a culture of enquiry, dialogue and reflection - ensure regular staff sharing meetings
  - b. Create platforms like 'Bal panchayats', Bal sansad and 'Bal sabhas' to help students voice concerns and issues

#### 4.8 Skills in Education and Employability

##### What the draft says

- 4.8.1 *Skill development programmes in school and higher education system will be reoriented not only for gainful employment of our students but also help them develop entrepreneurial skills.*
- 4.8.2 *As envisaged in the National Skill Development and Entrepreneurship Policy 2015 skill development programmes will be integrated in 25% of the schools and higher education institutions.*
- 4.8.3 *A detailed plan for the creation of skill schools for improving employment opportunities for secondary school students in special focus districts will be prepared.*
- 4.8.4 *The present skill based programmes at secondary, higher and technical education will be integrated through NSQF with the mainstream education to facilitate greater social acceptability as well as vertical and horizontal mobility. Institutional mechanism will be created for certification of skills through multiple entry and exit options, credit bank system, institutional collaboration for credit transfer, National Occupational Standards based delivery of skills for national recognition and outcome based assessment.*
- 4.8.5 *No mechanism for assessment and Recognition of Prior Learning (RPL) has been developed so far. To overcome this gap, the Government will, within a year, endeavour to develop a mechanism to assess and certify such skills and competencies and facilitate the entry of those who have no formal education and training but have acquired the skills without any certification for possession of those skills.*
- 4.8.6 *Joint certificates by the Sector Skill Council and the School/College authorities to help students take up wage-employment or start their own enterprise.*

##### Our Response

The entire articulation is vague and open to interpretation. What does academic equivalence mean? What are skill schools? What are special focus districts? Will streaming begin at the secondary stage itself?

The word 'skill' is often used in a very narrow way - to mean a physical activity that has no connection to either 'thinking' or 'emotions.' The picture one gets is of an 'assembly line' where people do one tiny part of a job without any need to understand what they are producing/contributing to, why it is being produced or where it goes – there is no contribution to thinking about their work either – how to make it better, what is right or wrong with it – just do it efficiently and well. The idea of 'capability' seems to be broader - looking at the whole person - intellectual capacity, social/emotional connect and physical ability. Narrow 'skill training' without building general abilities (e.g. critical thinking, problem solving, working in teams, communication) is of no use either to the individual student or to the community/economy. Vocational education in school must be seen as an opportunity for all students to learn how to 'do' something (e.g. learn a craft, grow something).

Vocational education as an ‘option’ or alternate for dropouts and poor performing students is reflective of the classical divide between the liberal and vocational approaches to education with fundamental difference with regard to the aims of education. While liberal education emphasis developing individual’s autonomy, vocational education focuses on acquisition of ‘skills’. It translates to creating a hierarchy of sorts which identifies vocational education as ‘low-status’ knowledge unlike academic education which is considered ‘high status’. This has eventually resulted in the vocational route being imposed upon socio-economically backward communities. General or academic knowledge is thus identified as the legitimate option for the privileged, contributing to perpetuating socio- economic inequalities in society. Historically, the vocational- liberal education divide is a phenomenon that has existed in several countries such as Britain, USA, Netherlands and Scotland.

A good vocational education and training system is recognized to have some key features such as a broader conception of work (vocation) and learning; thus vocational education exists not only for a particular job but it places learning the specific skills needed for each occupation within a broad educational framework. A good model allows for greater permeability between general and vocational education and choice of vertical mobility either way. For instance, in Australia, the entire education system is single qualification based: allowing students to move from one qualification to another

### **Our Suggestions**

1. Make Vocational Education an integral part of the secondary school curriculum
  - a. Should be based on those general abilities which are central to the aims of education
  - b. Unless basic abilities are built, any kind of ‘skill training’ will be of minimal use either to the individual student or to the community/country.
2. This should be part of the curriculum for all students till Class 10
  - a. It should not be an option only for ‘poor’ or ‘poorly-performing’ students
  - b. No student should be deprived of developing academic abilities by taking this option
3. No vocational aptitude tests should be administered to students in school - this often becomes an instrument of exclusion
4. This can be an optional stream after Class 10
5. The curriculum must be rigorous and demanding - should not be seen as an ‘easy’ option
6. Flexibility of vocational choices (crossing from one to the other) and eligibility for admission into higher education must be possible - taking a vocational program should not close doors to higher education
7. Quality infrastructure, faculty and learning resources must be made available for this in every school

### **4.9. Use of ICT in education**

#### **What the draft says**

- 4.9.1 *A concerted effort will be made to make ICT an integral part of education across all levels and domains of learning.*
- 4.9.2 *Courses on the use of ICT as a tool for enhancing the teaching-learning process will be an integral part of the teacher education curricula.*
- 4.9.3 *Online maintenance of all records of a child from the time of admission till the time of leaving the school will be made mandatory.*
- 4.9.4 *IT-based applications will be used for monitoring teacher and student attendance, performance evaluation of teachers and school administrators, performance of students and also for administrative functions like maintenance of records and accounts*
- 4.9.5 *A programme for the exclusive use of IT applications for School Management will be drawn up by the central and the state governments on priority. IT reporting systems will be a powerful tool to better school management and performance.*

- 4.9.6 *ICT cannot be seen in isolation but has to be seen along-with other infrastructure issues, like availability of proper rooms, reliable electricity, network. Connectivity, security of school premises, maintenance of infrastructure, etc. Providing for these components will be taken care of in the programmes for improvement of educational opportunities and facilities. Since reliable electricity is likely to be an issue, the option of use of solar energy in educational institutions will be made an integral part of the programmes for expanding the use of ICT.*
- 4.9.7 *MOOC is another application of ICT which may help in enhancing the ICT enabled education at secondary and higher education levels, esp. for enhancing access to quality education at an affordable cost.*
- 4.9.8 *Adopting the already developed model may work for short term. Applications/ models to cater to the local needs will be developed in addition to usage of already developed Models. Development of different kinds of software/ mobile apps using the available open software by teachers and students to suit the local needs will be encouraged and facilitated.*

### **Our Response**

ICT tends to present itself as an attractive silver bullet but does not address core challenges in education – it can be used as an enabler but not as a driver of educational change. Using technology often makes the state or departments or schools feel that ‘something is happening’ but that is very often untrue. Technology in the school classroom is only as good as the teacher who uses it. It works only when core issues of the teachers - subject and pedagogical competence - are addressed. While technology is useful to connect teachers and provide access to new research and knowledge, even this works only when core issues have been addressed.

The following factors influencing a teacher’s use of ICT emerge from literature:

- Depth of subject knowledge and pedagogical theory, pedagogical motivation and the ‘private’ theories they have developed about ICT through ‘observation, interaction, instruction or inferences’
- Understanding of the subject influences the confidence with which technology is put to use, and the kind and extent of use
- Personal belief of the teacher, his or her personal philosophy regarding ICT and pedagogy
- Student competence and continuing support for the teacher - both technical support and pedagogical support
- Organization of learning experiences and clear directions regarding ICT use in terms of policy and curricular opportunities
- Resource availability in the school

Given the above, the recommendations to include ICT as a tool for enhancing the teaching-learning process in the teacher education curriculum and building operational capability are good. However, care must be taken to do so with careful planning, and taking the process of teacher development and learning into consideration.

Another good recommendation is the use of ICT for monitoring and tracking. Setting up Education Management Information System (EMIS) will facilitate collection and use of timely, cost effective and accurate data for evaluating education policy, guide educational planning, and monitoring attainment of educational goals. It can provide a picture of status of education system and learning outcomes at the national, state, district, block and cluster level. The commitment to improve infrastructure and security will definitely aid inclusion of technology in both management and teaching-learning. However, rural electricity supply suffers both in terms of availability for measured number of hours & penetration level. In more than 24 States more than 25% of their rural households don’t have access to electricity. Under such circumstances, technology use would be meaningless without electricity connections, infrastructure and connectivity. Experience with solar energy and its suitability in different geographies and different times of the year indicate that penetration of traditional forms of electrification will be an enabler. In addition to infrastructure, another requirement is

of timely and relevant technical support. The role of back up support (repair and maintenance) cannot be negated.

MOOCs are untried in our country on a large scale; their use needs to be carefully studied and extensive trials carried out otherwise they have the potential of perpetuating the inequities of the digital divide.

### **Our Suggestions**

1. Focus on building teacher capacity in subject and pedagogy
  - a. Technology integration in the classroom needs a shift in teaching-learning processes
  - b. Build teacher confidence and provide autonomy to teachers to choose their tools and processes in the classroom (including ICT)
2. Use ICT for teacher's self-learning or as a tool to connect teachers
3. Ensure linkage of ICT material to the curriculum
4. Leverage technology for management of education – explicit recommendations for a teacher management system also need to be made
5. Develop national and state policy on use of ICT in education (including safety)

## **4.10 Teacher development and management**

### **What the draft says**

- 4.10.1 *A transparent and merit based norms and guidelines for recruitment of teachers will be formulated in consultation with the state governments. Independent Teacher Recruitment Commissions will be set up by the state governments to facilitate transparent, merit based selection and recruitment of teachers, principals and other academic cadres.*
- 4.10.2 *All vacancies in teacher education institutions and all positions of head teachers and principals will be filled up. Leadership training for head teachers and principals will be compulsory.*
- 4.10.3 *Transparent norms will be developed for fair and equitable deployment of teachers, for public display of their vacancies and transfers. For remote and difficult areas, efforts will be made to recruit the teachers locally.*
- 4.10.4 *Manpower planning will be done by the state governments to assess subject-wise and state-wise requirement of teachers and also to cover training of untrained teachers within a specified time frame. Contractual teachers will be phased out gradually by absorbing the eligible teachers against sanctioned positions.*
- 4.10.5 *Issues relating to teacher absenteeism, teacher vacancies and lack of teacher accountability will be resolved with strong political consensus and will. Disciplinary powers will be vested with the School Management Committees (SMCs) in case of primary schools and head teachers/ principals in upper primary and secondary schools to deal with absenteeism and indiscipline, assisted by technology for recording attendance with mobile phones and biometric devices.*
- 4.10.6 *Special emphasis will be laid on improving the effectiveness of programmes for the initial preparation and continuing professional development of teachers. The diploma and graduate teacher education programmes and the teacher training institutions will be reviewed for changes in duration, pattern, structure, curricula and delivery to overcome their existing limitations.*
- 4.10.7 *At the National level, a Teacher Education University will be set up covering various aspects of teacher education and faculty development. The Regional Institutes of Education under NCERT will be developed and converted to Teacher Education Universities at the regional levels.*
- 4.10.8 *It will be mandatory for all teacher education institutions, such as, DIETs, B.Ed. Colleges, etc. to be accredited. Benchmarking standards will be laid down for block resource centres.*
- 4.10.9 *Teacher development programmes will have components to help teachers appreciate the importance of co-scholastic activities especially life skills, ethical education, physical education and arts and crafts and introduce these effectively into the teaching learning process in schools.*

- 4.10.10 *In addition to the national level teacher awards, state and district level awards for teachers will be instituted based on a set of objective criteria. SMCs will play an important role in recommending the names of teachers for the awards.*
- 4.10.11 *Programmes for enhancing the capacity, motivation and accountability of teachers to deliver quality education and improvements in learning outcomes of students will be accorded priority.*
- 4.10.12 *It will be made mandatory for all in-service teachers to participate in training/ professional development programmes once in every three years. Central and state governments will make adequate arrangements to train all in-service teachers within a period of three years by leveraging technology.*
- 4.10.13 *Periodic assessment of teachers in government and private schools will be made mandatory and linked to their future promotions and release of increments, as applicable. They will have to appear and clear an assessment test every 5 (five) year which assesses their pedagogic skills and subject knowledge.*
- 4.10.14 *A separate cadre for teacher educators will be established in every state. The large number of vacancies in the SCERTs, DIETs and other teacher education institutions will be filled up to strengthen these institutions and build their capacity.*

### **Our Response**

**Pre-Service Teacher Education:** This is a very feeble response to a critical issue especially given how much discussion has already taken place and the general agreement around this. Asking for a 'review' at this stage is evading one of the most fundamental issues in our education system. Improving pre-service teacher education is at the core of improving education and this needs a revolution - a full scale, ground-up redesigning of the system, structures and operations. At its core, education is the process between the teacher and the student. If education has to improve, teaching has to improve - there is no way around this. Pre-service teacher education builds very little capability - curriculum and classroom processes are mostly out-dated and distanced from the reality of the school and the children it is supposed to serve. Teacher education is a multi-disciplinary process, and needs experts in various areas to teach student-teachers (e.g. only a Child Psychologist can teach Child Development & Learning). Stand-alone teacher education colleges cannot afford to build such a varied faculty. In practice, jack-of-all faculty end up rote-teaching the textbook, as they come without disciplinary understanding. Hence, teacher education needs to be situated within a multi-disciplinary University or institution. This is the norm in most countries that have a decent teacher education system. There are a large number of dysfunctional teacher education institutions where even the minimum curricular/course requirements are not met – they need to be immediately closed. Teacher preparation needs sufficient time and space to develop education perspectives, understanding of subject and pedagogy and develop an identity as a teacher – theory must be integrated with continuous graded practice. The country should move towards a four-year teacher preparation program over the next ten years.

**NCTE** has not been mentioned in the report though NCERT finds a place. NCTE is currently seen as an inspectorial, regulatory body focussed mostly on infrastructure requirements and not as a body that leads thinking on professional standards, academic rigour and curricular innovation in teacher education. The approach and methods of NCTE have been at the heart of the commercialized and dysfunctional teacher education system that has developed over the past 25 years. Improving teacher education is at the core of improving education in India and that needs a full scale, ground-up redesigning of the system, curriculum and operations. Such a full-scale revamp needs a champion and not an 'inspector.' NCTE should either be the enthusiastic champion of this or should be disbanded.

**In-Service Teacher Education:** This is a very weak, limited and generic response to a huge challenge. This has been discussed in detail at multiple forums which is just not reflected in the recommendation. In-service teacher professional development is critical to improving the quality of education. If we want to see improvement in schools and in learning in the next decade, the capacity of our existing teacher pool must improve substantially. This also has a direct and positive impact on motivation of teachers. The

approach and structure of in-service professional development needs fundamental re-thinking. The range in capacities of our existing 8 million teacher is wide - but it's true that the average capacity (as it were) is far away from what our expectations from education demand of the teacher. This is no fault of the teachers, it has entirely been a cumulative outcome of the inadequacies on multiple levels, including our vision of the teacher's role, preparation for it, rigidities of the school system and culture. The overall philosophy, approach, principles and possible structures or institutional mechanisms for implementation of in-service teacher professional development should have been articulated.

**Teacher recruitment and deployment:** These are much needed recommendations especially that of filling vacancies in institutions. However, a clear recommendation for filling all teacher vacancies is not coming through. It is also worrying that the recommendation for manpower planning is suggested to assess subject-wise and state wise requirement of teachers. This should be done at the school level, not even the block or district, leave alone the state level - each school must have a full complement of subject teachers as per norms.

Leadership training for head teachers and principals, training of untrained teachers and phasing out of contractual teachers by absorbing eligible teachers against sanctioned posts are also welcome recommendations.

**Teacher absenteeism:** Both experience across the world and literature have evidence to show that teacher accountability without autonomy and capacity through quality teacher education programmes are almost a contradiction in terms.

Accreditation of teacher education institutions and benchmarking of block resource centres are good recommendations. However, a large missing piece is the preparation and continuing professional development of teacher educators, although creating a teacher educator cadre in each state is a good recommendation.

The draft has not expressed a view of the policy on private teacher education institutes (or schools). Given the preponderance of the private presence in both sectors, the policy needs to state whether the current policies are appropriate or need review.

## **Our Suggestions – Pre-Service Teacher Education**

### **I. Structure**

- a.** Situate teacher education in universities/colleges with a multi-disciplinary environment
  - i.** Make Universities fully own and regulate teacher education institutions/programs - Universities should run teacher education institutions/programs with complete ownership and not just affiliate them
  - ii.** Link all teacher education institutions formally to a network of schools
- b.** Phase out the National Council of Teacher Education (NCTE)
  - i.** Option 1 - Abolish NCTE within a specific time-frame
  - ii.** Option 2 - Abolish it in its current form and revamp it into an accrediting body for teacher education - redesign it with appropriate structures and functions
- c.** Close all dysfunctional teacher education institutions
  - i.** This needs strong political will, positive administrative intent and an intelligent implementation strategy
  - ii.** Some criteria for closure: No full-time students/classes/staff; Unfair examination practices, Not fulfilling full teaching practice/school internship component; Poor quality infrastructure
  - iii.** Process for closure: Form an independent task force in every state; Identify people who are seen to have high integrity and understanding of teacher education; Ensure recommendations will be acted upon – committee should not be only 'recommendatory' but should be vested with execution/implementation powers

### **2. Programs**

- a. Move towards a four-year teacher preparation program over the next ten years
  - i. The four-year program would include specialization in subjects and stages of education: early childhood, elementary and secondary education
  - ii. Students join this program after Class 12
- b. Scrap all Diploma programs in pre-service teacher education
  - i. This includes the Diploma in Elementary Education (D.El.Ed.)
  - ii. Advanced diploma programs could be offered for specialized courses after the initial teaching degree/teaching experience
3. Transition from the current 2-year to the proposed 4-year program
  - a. From 2016-2018
    - i. Evolve teacher education curriculum for the integrated 4-year programs
    - ii. Identify & strengthen functioning institutions
      - Fill faculty vacancies
      - Focus on building capacity of teacher educators
    - iii. Shut non-functioning colleges
    - iv. Identify and prepare for the following:
      - Three teacher education institutions per State to offer the 4-year program by 2017
      - One national level institution (e.g. the Indian Institute of Science) to run a 4-year B.Sc./Ed. integrated program by 2017
  - b. From 2019 - 2021
    - i. Re-do recruitment criteria to be aligned with the new qualifications
      - Will have two sets of teachers in the system - equivalence to be established
    - ii. Implement, document, research the above longer duration programs
    - iii. Stop admissions to all D. El. Ed. programs by 2017 (last graduating batch - 2018)
    - iv. Stop admissions to all 2-year B.Ed. programs by 2020 (last graduating batch - 2021)
  - c. From 2022 - 2026
    - i. Upgrade all functioning/performing institutions to integrated institutions under relevant Universities/Set up new institutions wherever necessary
    - ii. Ensure that all institutions have moved to the new system
    - iii. *There should now be only one way to become a teacher i.e. through the 4-year integrated teacher education program with specializations*

### **Our Suggestions – In-Service Teacher Education**

1. Teachers must have the opportunity to choose from multiple modes of learning e.g. workshops, reading, discussions, exposure visits, in-class support
2. All modes must be anchored in a relevant curricular framework, which may go through review and revision on the basis of change in reality of the teacher population.
3. Currently (and, at least till 10 years after pre-service teacher education moves to a high quality 4-year program) the framework must adequately address beliefs of teachers, perspectives in education, content, pedagogy, nature of subjects, school culture and management
4. Based on the curricular framework, a curriculum for a particular period must be evolved in a participatory manner, at a level as close possible to the schools and teachers and in no case above the district. There must be no centralized determination of the curriculum, no cascade-model training and no rigid norms.
5. Teacher learning communities must be created, developed and sustained. While these efforts need facilitation with great academic and social expertise, it must be done such that a culture of self and peer learning is developed, with not even a whiff of ‘command and control.’
6. Teacher support and development must be a key part of the role of the school leader.

7. The SCERT-DIET-BRC-CRC structure will have to be overhauled with these design principles, staffed adequately and with people with appropriate capacity and attitude – eventually, in the future when the system is developing and sustaining teachers who are self-directed learners, they may have to be wound down or changed into higher education institutions.
8. Make teachers allies: Perhaps the most important matter that will enable such in-service education to happen and to improve schools, is to focus on making teachers the owners and allies of this change.
9. For this to happen teachers will have to be trusted, and the energy and capacity of the more motivated teachers will have to be harnessed to lead this change.
10. The other practical matter is that in each district, there will have to be a **cohesive team of 40-70 teacher educators** dedicated to this effort. This group will form the core of the change effort. This team or part of it could be within the state system, and equally with competent and dedicated civil society organizations.
11. Structure
  - a. Put in place an integrated teacher education system for schools from State to Cluster - the reporting structure should be CRC to BRC to DIET to SCERT
  - b. Strengthen district, block, and cluster-level institutions for teacher development - each unit must have expertise across school subjects and school stages,
  - c. Strong academic lifelines like the CRCs and BRCs for schools can flourish only with strong academic institutions like DIETs and SCERTs supporting them
12. Process
  - a. Use discussions with teachers, classroom observations and learning outcome data to analyse professional development needs of teachers at the block levels
  - b. Offer calendarized professional development programs for teachers to choose from
  - c. Offer different modes of professional development (besides 'training')
    - i. Early tenure coaching, Peer learning, Resource centres, Demonstration classes
    - ii. Sabbaticals for research/advanced studies, Seminars, Visits to other institutions
    - iii. Access to professional journals, e-learning communities, ICT-based self-learning
13. Develop teacher learning communities by establishing voluntary professional networks of teachers (E.g. Subject teacher forums in every Block)
  - a. Members work out processes by which they meet, engage and share
  - b. Each group should have an anchor who will coordinate its activities
  - c. Expert inputs from identified people/institutions/organizations can be invited
  - d. Journals/newsletters for teachers at the block run by and for them
14. Encourage regular Teacher Meets - at National, State, Regional, District and Block levels where experiences/papers are presented, shared and discussed
15. Develop high quality material for teachers in Indian languages
16. In time, teacher learning communities will lead academic discourse in their respective areas and fully own their own professional development

### **Our Suggestions – Teacher Management**

1. Standards and Assessment
  - a. Evolve national professional standards for teachers, teacher educators and teacher education institutions
  - b. Assess all Teacher Education Institutions (government and private) every five years based on the above performance standards – place results in the public domain
2. Develop a robust licensing and re-certification system for teachers and teacher educators - this will take care of professional accountability (rather than having something like a test every five years).
3. Create an academic cadre of teacher educators in every State (*already recommended*)
4. Ensure equivalence in service conditions for teachers across all stages of School Education – from Early Childhood Education to Higher Secondary Education

5. Stop all 'para teacher' systems across the country by 2018 (teachers without qualifications; those who do not go through in-service professional development; ad hoc contracts etc.)
6. Ensure basic service conditions for teachers in all private schools
7. Develop two categories of indicators for assessment
  - a. 'Hard' indicators or non-negotiables (e.g. teacher attendance, financial propriety) which must be used to hold people to account in a definitive, decisive manner.
  - b. 'Soft' indicators or competencies (e.g. classroom processes, quality of the school assembly) which must be used to ensure that the right kind of support is provided for development and improvement.
8. Use learning outcomes very carefully
  - a. A simple cause and effect relationship between learning outcomes and teacher effort is difficult to establish - too many variables impact learning.
9. Do not rank schools or teachers: No substantive evidence exists that incentivizing or holding teachers/schools accountable on output measures leads to better learner outcomes.

### **Our Suggestions – Preparing Teacher Educators**

1. A sustained, continuous, structured, long-term focus on development of teacher educators is critical
2. Pre-service programs for teacher educators
  - a. Identify and prepare at least 100 institutions (including the 30 Schools of Education which need to be set up in Universities) across the country to deliver high quality teacher educator preparation programs
    - i. Begin with the two-year M.Ed. as currently prescribed by NCTE
    - ii. Every teacher educator must have at least three years of school teaching experience
3. In-Service professional development for teacher educators
  - a. Offer a range of opportunities for professional development of teacher educators such as sabbaticals for research/ advanced studies; seminars, exposure visits, access to professional journals and e- learning communities etc.
  - b. Facilitate voluntary professional networks of teacher educators forums for professional interaction and development
4. Identify and develop 40-75 outstanding teacher educators per district in every state
  - a. These teacher educators are to be dedicated to in-service teacher education.
  - b. Identify them through a competency-based, impartial selection process based on professional standards for teacher educators
  - c. Put them through a rigorous full-time or several short-term programs
  - d. Place them in critical positions (e.g. faculty at DIET/BRC/CRC) – make them responsible for anchoring in-service teacher professional development in that district for ten years.
  - e. Civil society organizations/institutions may collaboratively perform similar roles
5. Develop high quality material in Indian languages for teacher educators
6. Long Term: Once the four-year teacher preparation program is in place, the pre-service program for teacher educators will entail a one-year teacher educator specialization at University after at least three years of teaching experience

### **Other Suggestions**

1. An acute shortage of teachers in Science, Mathematics & Geography across the country is predicted in the near future. Several Bachelors in Science programmes across the country have been closing down for want of students – this is the route through which we develop teachers for science and mathematics at the secondary level. If this 'pipeline' closes, the crisis of availability of qualified science and mathematics teachers at the secondary level will significantly deepen. Incentivizing students and institutions to run such programmes/ join the programmes is one route that could be taken. Identified premier institutions of science could be asked to start high-profile courses to prepare science/ mathematics teachers and teacher educators.

2. Attracting Students to Teaching: Teaching as a career does not appear to be very attractive to most students. There needs to be a sustained campaign to attract the best of our young minds into the profession for reasons beyond the ‘security’ of a government job or a ‘noble vocation’ – it has to be seen as an attractive aspirational profession.
3. Pupil Teacher Ratio (PTR) is significant for quality of teaching. A rationalization exercise needs to be carried out to ensure availability of subject teachers in all schools and not at the district or even block level.
4. Innovative teachers training programmes currently in practice by identified organizations and showing good results could be evaluated and accredited independently by the Government.

#### 4.1.1 Language and culture in education

##### **What the draft says**

- 4.1.1.1 *All states and UTs, if they so desire, may provide education in schools, up to Class V, in mother tongue, local or regional language as the medium of instruction.*
- 4.1.1.2 *Knowledge of English plays an important role in the national and international mobility of students and provides an access to global knowledge. Hence, it is important to make children proficient in reading and writing English. Therefore, if the medium of instruction upto primary level is the mother tongue or local or regional language, the second language will be English and the choice of the third language (at the upper primary and secondary levels) will be with the individual states and local authorities, in keeping with the Constitutional provisions.*
- 4.1.1.3 *Higher Education Institutions, especially technical and professional institutions, will provide opportunities to all students to learn about India’s rich heritage, linguistic and cultural diversity and knowledge systems.*
- 4.1.1.4 *Indian culture, local and traditional knowledge will be given adequate space in the school education. Ethics education will be integrated at all levels for inculcating values of equality and equity, social justice, fraternity, democracy, responsible freedom and liberty, spirit of fraternity and national integration.*
- 4.1.1.5 *Keeping in view special importance of Sanskrit to the growth and development of Indian languages and its unique contribution to the cultural unity of the country, facilities for teaching Sanskrit at the school and university stages will be offered on a more liberal scale.*
- 4.1.1.6 *Educational institutions will instill among students civic sense, discipline, punctuality, cleanliness, good conduct, empathy and compassion for the elderly, downtrodden and weaker sections, respect for women and a humanistic spirit.*

##### **Our Response**

Children are born with an innate language faculty. Most children, even before they start their schooling, internalize an extremely complex and rule-governed system called language and possess strong linguistic capabilities. In many cases, children come to school with two or three languages already in place at the oral-aural level. Language is also the medium through which most knowledge is constructed, and hence it is closely tied to the thoughts and identity of the individual. Therefore, the recommendation that medium of instruction till Class 5 be the mother tongue or local or regional language must be stated as a policy to be followed by all schools.

English is seen by many as the language of the real world/power, and as a means of social mobility. Over the last two decades there is a growing demand for English medium schools, those who can afford it are removing their children from government schools to private schools, even if the latter are of questionable quality. Acknowledging this fact, the recommendation that children be proficient in reading and writing English is apt, provided it is taught well with teachers who are equipped to teach the language.

Educational institutions can inculcate the suggested values only if the culture enables it. These values cannot be ‘taught’ as theory but have to be demonstrated by ensuring all institutions have a democratic,

participatory, empathetic and inclusive culture. Leadership training for head teachers/principals should prepare them to lead such a culture while teacher professional development should model this culture.

### **Our Suggestions**

1. Mother tongue/home language must be the medium of education during the early years of education
2. English should be taught in addition and English proficiency should be achieved, but not at the cost of the mother/tongue/home language
3. Children can receive multilingual education from the outset - the three-language formula needs to be implemented in its spirit, promoting multilingual communicative abilities for a multilingual country
4. Teacher proficiency in the local language/languages of the region is crucial
5. Teacher education must build understanding and ability to use multilingual classrooms as a resource rather than a barrier to education
6. A wide range of high-quality material in Indian languages must be made available to teachers and students

## **4.12 Self-development through comprehensive education**

### **What the draft says**

- 4.12.1 *Physical education, yoga, games and sports, NCC, NSS, art education, Bal Sansad, covering local art, craft, literature and skills, and other co-scholastic activities will be made an integral part of the curriculum and daily routine in schools for the holistic development of children. Facilities for the above will be a pre-requisite to the recognition of schools.*
- 4.12.2 *Funds will be earmarked by the government/ school management for all co-scholastic activities in schools.*
- 4.12.3 *The implementation of the school health component, generally administered by the Health Department will be supported by the education departments and schools. The schools will draw up a roster for check-ups and ensure that the schedule is followed. As a part of the Digital India initiative, apps will be developed to track and monitor the health record and status of each child.*
- 4.12.4 *The school nutrition programme implemented through the on-going Mid-Day Meal Scheme (MDMS) has helped supplementing nutrition and promoted social equity. The MDM programme will be extended to cover students of secondary schools. Teachers will not be burdened with the task of supervising cooking and serving mid-day meals. The practices of engaging the services of reputed community organisations to provide the mid-day meals cooked in centralised kitchens and distributed in the schools will be encouraged.*

### **Our Response**

One of the most basic aspirations of human beings is the desire to acquire the capabilities that would help them lead a happy, long and healthy life, to be knowledgeable, have access to the resources needed for a decent standard of living and be able to participate in the life of the community. Without these, many choices are simply not available and many opportunities in life remain inaccessible. Fundamental to enlarging these choices is building capabilities – the range of things that people can do or be in life.

The purpose of education is to facilitate the development of autonomous individuals capable of independent thought and action. This capability must lead to the realization of each one's role in social processes and contribute to material sustenance. Education, thus, must empower individuals to develop both individual capacities (independent and critical thinking, creative abilities and skills for material sustenance) and social capacities (empathy, resilience, work-ethic, an ethical compass).

Arts and Crafts, Physical Education play a vital role in the child's development. They should be a part of the school curriculum but are never treated on par with the other subjects - their integration in school education is mostly fragmented and often relegated to "extra-curricular activities."

### **Our Suggestions**

1. Abandon the hierarchy of school knowledge - see arts and sports on par with other subjects (e.g. mathematics) and as an integral part of the school curriculum
2. Encourage all children to participate in arts and sports regardless of expertise or ‘natural inclination’
3. Introduce children to a variety of art forms - encourage them to enjoy using different kinds of material
4. De-emphasize ‘perfection’ in art or sports
5. Use sports to develop psycho-motor skills, team ability, working collaboratively in diverse groups
6. Build physical, intellectual and emotional resilience through both – learn to handle success and failure/praise and criticism/victory and defeat
7. Focus on local/folk forms of art/games
8. Ensure availability of adequate resource material and infrastructure in schools
9. All schools should have specialized teachers for arts and sports
10. Classroom pedagogy and school culture must reflect the kind of ethics that the curriculum seeks to promote (good values cannot be taught, they must be seen in practice)
11. Having separate ethics or moral science classes can often routinize an important issue like this and would not serve the purpose
12. School and classroom culture that promotes critical thinking, reflection and sensitivity to others is central to the internalization of ethics and values

### **4.13 School assessment and governance**

#### **What the draft says**

- 4.13.1 *The framework of school standards with various parameters and indicators to measure school quality, professional competence of teachers, school leadership and the school management, as well as, self-appraisal and performance assessment will be used throughout the country. Thereafter, schools will be evaluated, graded and ranked based on this framework.*
- 4.13.2 *A mechanism will be put in place for accreditation of school boards.*
- 4.13.3 *The central and state governments will address gaps in policy framework regarding the implementation of School Management Committee (SMC) within the framework of RTE Act and provide broad implementation and monitoring guidelines.*
- 4.13.4 *As a part of the oversight of the SMCs, the state governments will provide clear guidelines on the election process, frequency, tenure, roles and responsibilities and their functioning. States will endeavour to increase allocations for SMC training and ensure that schools receive their grants in time, to effectively implement School Development Plans (SDPs). SDPs will be integrated into the budgeting and planning process at the district level.*
- 4.13.5 *Evidences show that some schools perform better than others because of the leadership of the principal or headmaster. A separate cadre of principals and headmasters will be created, selected on merit and aptitude, from amongst the teachers with at least 5 years of teaching experience and existing vacancies of headmasters and principals will be filled in a time bound manner.*
- 4.13.6 *Improved school governance requires expanding the definition of school leadership to a more holistic framework which includes defining the roles and responsibilities of a school leader, articulating a school leader competency framework, introducing a robust and transparent process of selection of principals/head teachers and induction programme for school leaders, and providing opportunities for continuing professional development with well-defined pathways for career growth.*
- 4.13.7 *Principals/head teachers will be held accountable for the academic performance of the schools and its improvement. The education department will fix the minimum tenure of principals/ head teachers.*

#### **Our Response**

The last recommendation is one of the most important and controversial issues in education. After a few decades of global experience, it is quite clear that the notion of “accountability” of teachers or head

teachers is a far more complex issue than in other spheres. It is also clear that systems that try to establish such accountability by “tying to test scores of students” (in one way or the other), have not only failed, but have caused foreseen and unforeseen damage to the education system. We must not repeat this mistake.

A threatening environment is the nemesis of any sustainable quality. Accountability, if seen from a very narrow perspective, most often, leads to fear, frustration and fudging of data. Holding head teachers/teachers responsible for results on standardized tests, for example, has not improved learning outcomes anywhere in the world - all it has done is cause stress and tension among teachers and students, and often caused deep damage to the education system. Direct linking of learning outcomes and teacher/head teacher career progression is hugely problematic - again, it has not worked anywhere in the world.

There are many factors at multiple levels influencing academic performance or learning outcomes in the classroom, and these factors and their interplay are not stable over time. Also, emphasis on teacher/head teacher performance and accountability tied to academic performance without due emphasis on teacher/head teacher capacity and empowerment along with other factors that influence academic performance is very narrow and can have disastrous results.

In education (as in other social-human enterprises) it would be more effective to embed the notion of “role responsibility”, rather than “accountability”, a notion which in current discourse is often infused with meanings from the world of business and also of mechanical systems. Thus, teachers should be accountable for performing their roles responsibly, and while this may be more complex than accountability tied to test-scores, it is educationally more effective.

### **Our Suggestions**

1. Use the standards developed by NUEPA’s Shala Siddhi to track school development
2. Use learning outcomes very carefully
  - a. A simple cause and effect relationship between learning outcomes and teacher or head teacher effort is very difficult to establish - too many variables impact learning
  - b. Conduct sampled learning assessments once every 3 years to check overall ‘health’ of the system at the District/State level - use the results for planning
3. Do not rank schools or head teachers or teachers: No substantive evidence exists that incentivizing or holding head teachers/teachers/schools accountable on output measures leads to better learning outcomes

## **4.14. Governance Reforms in Higher Education**

### **What the draft says**

- 4.14 *An Education Commission comprising of academic experts will be set up, every five years to assist the Ministry of HRD in identifying new knowledge areas/ disciplines/ domains as well as pedagogic, curricular and assessment reforms at the global level, which will help to keep up with the change in global scenario and national aspirations.*
- 4.15 *Governing bodies of higher education institutions will be made multi-stakeholder, having representations from industry and alumni as well, with clear cut transparent guidelines for the composition and selection of such bodies.*
- 4.16 *Efforts will be made to move towards a university system integrating UG, PG & doctoral studies, with faculty concurrently teaching both at UG and PG levels which will help improve synergies between teaching and research. Universities will be multi-disciplinary in nature and not single discipline specific.*
- 4.17 *The State will endeavour to implement the recommendations of earlier policies of 1968 and 1986/92 for the creation of an Indian Education Service (IES), which is reiterated herein too. The IES will be an all India service with HRD as the cadre controlling authority. Till the IES comes into existence, an interim*

- step of a one-time special recruitment by UPSC from among the existing academic and administrative positions in the education sector in various states will be made in concurrence with the states.*
- 4.18 *Separate education tribunals will be established at the centre and in the states to deal with litigation and address public grievances against government as well as private schools/ institutions. These bodies will be headed by a retired High Court Judge. The tribunals will have the power to follow summary procedures for expeditious disposal of cases.*
- 4.19 *The Government recognises and will encourage the positive role played by students' unions in furthering the interests of democracy and strengthening the democratic systems, governance and processes as well as debates, discussions and pluralism of thoughts. However, it has been observed that most of the disruptive activities and disharmony in a campus are led by outsiders and students who remain enrolled for many more years than what is mandated in the course of study they have enrolled in. A study will be conducted to prevent outsiders and those who have ceased to be students from playing an active role in students' politics and disrupting the academic activities as well as to prevent them from staying in hostels and misuse facilities of the institute.*
- 4.20 *All HEIs will put in place an effective grievance redressal mechanism and will follow the principles of natural justice— mens rea and audi alterem partem- before taking any punitive action against any student, faculty or organisation.*
- 4.21 *The existing affiliating system will continue but with a maximum limit of 100 on the number of affiliating colleges. Universities having more than 100 affiliated colleges under its ambit will be accordingly restructured.*
- 4.22 *Norm-based funding with incentives for activities that promote excellence in public-funded higher education institutions will be introduced.*
- 4.23 *All public-funded institutions will prepare perspective plans with specific milestones and timelines so as to ensure autonomy with financial and administrative accountability.*

### **Our Response**

Higher Education plays an important role in enhancing the capacities of adults to contribute to personal and social well-being. Structures, curriculum and processes of higher education should be aligned to this purpose - providing learning opportunities for all students in a flexible yet rigorous manner is critical. What is really valuable are broad capabilities that will stand people in good stead for the future - tailoring people into jobs that may disappear after a few years does not help. Abilities like independent learning, decision making, working collaboratively, understanding how knowledge is generated and rationally critiquing existing knowledge need to be the focus. Higher education must also look at building expertise that society will need over the next 25 years or so.

Given this context, while making some good recommendations, the document also leaves some gaps and raises some concerns. Setting up an Education Commission by MHRD to identify new areas of knowledge to keep abreast with global changes and national aspirations is a good idea, provided the Commission is independent of any political or other interference and/or leanings, and Universities have the autonomy to take or leave its suggestions. The recommendations related to multidisciplinary universities with synergy between research and teaching, reducing the burden of affiliation and perspective planning by institutions are also much needed. However, a detailed evaluation of the current status of higher education and suggestions on how to re-design it to meet the aspirations of youth as well as of the nation would have been in order.

The document emphasizes the need for restoring the academic purpose of Universities while putting processes for grievance redressal by stakeholders in place. However, the judiciousness of setting up tribunals needs to be examined further - while it sounds beneficial, since a lot of issues can be sorted out which would otherwise come to the Courts, it needs to be assessed whether this expensive additional structure will be value for money. Similarly, replacing administrative services with education services does bring the required focus into the domain, however, the document is silent on how the current issues with

the bureaucracy will be avoided. Also, clarification on working of the cadre is required - will members of this cadre teach or merely perform administrative roles?

Governing bodies are responsible for upholding the values, vision and purpose of institutions - they are also the custodians of institutional autonomy and accountability. Universities are accountable to multiple stakeholders – the Yashpal Committee Report mentions society, government, students, recruiters, alumni etc. Therefore, to provide universities with a holistic worldview and ensure multiple perspectives, multi-stakeholder governing bodies are necessary; there should be a balance of skills, experience and competences among members. And the governing body must have representation of students, faculty and staff. It is important to point out that financial autonomy, along with academic and administrative autonomy, is a must for institutions to develop their own unique institutional identity. In principle, expenditure must be connected to outcomes, but this entire approach fails if basic 'hygiene factors' are not in place. Some of these 'hygiene' factors include: infrastructure & resources (e.g. an understaffed institution cannot be held accountable for outcomes that depend on full faculty strength); quality of people; choosing the right approach (e.g. choosing to focus on strengthening institutions rather than programs that give some short-term gains); disbursement of finances; prevention of wastage and 'leakages' in the system; etc. While a model of norm-based funding has been positioned as being equitable and outcome-based funding as incentivizing institutions, the potential of an institution should be the criteria along with relevance (e.g. situated in a remote geographical area; catering to a niche population – as in offering a course rooted in local knowledge; of historical importance e.g. Shantiniketan) while taking decisions on funding.

The draft is largely silent on recommendations related to access in underserved geographies; curriculum, pedagogy and assessment; inclusion; institutional development and autonomy.

### **Our Suggestions - Governance**

1. Re-look at governance structure of universities
  - a. Universities could have a Board with representation from stakeholders selected based on certain criteria
  - b. Vice-Chancellors could be selected by the Board
2. Ensure autonomy of institutions with regulatory oversight
  - c. Components of autonomy include academic administration, faculty recruitment and development, creation of a learning environment and institutional processes
  - d. Institutional culture has to be aligned to aims of education
  - e. Autonomy must be safeguarded within a broad framework of standards and regulations - regulation is needed till we have institutions of quality
  - f. Quality implies decentralization and a new institutions which are truly not-for-profit - foreign universities are welcome if they are not-for-profit entities
3. Clearly define the role of governing bodies to
  - a. Approve and facilitate the development of the vision and goals of the institution
  - b. Ensure the establishment monitoring and accountability systems
  - c. Monitor institutional performance and quality assurance arrangements
4. Build an institutional culture of autonomy and accountability
  - a. Institutional autonomy is a must for institution building - it promotes ownership and quality
  - b. An enabling and participative culture that is characterized by equality and respect for the value and dignity of each human being ensures effective processes
  - c. Both autonomy and accountability are critical - an empowering culture based on autonomy is a necessary condition for accountability - decentralization is central to autonomy
  - d. An institutional vision and common purpose helps stakeholders to work towards a common goal

### **Our Suggestions - Design, Structure, Areas of focus for Higher Education**

1. Re-design Higher Education
  - a. Ensure flexibility in the structure and design of programs
  - b. Develop a qualifications framework with common core/foundation courses across disciplinary programmes
  - c. Re-orient structure, goals, curriculum, pedagogy and faculty eligibility criteria based on the framework
  - d. Allow changes across streams of study (e.g. arts to science)
  - e. Allow a variety of combinations of areas of study (e.g. music and chemistry)
  - f. Allow flexible 'entry and exit' into and from programs
2. Ensure that all students are offered academically rigorous and socially relevant learning experiences
  - a. Update all curriculum and syllabi based on research in each discipline
  - b. Provide a rigorous grounding of knowledge in the students' chosen stream
  - c. Ensure classroom processes are based on Constitutional values, encourage rigorous thinking, reading and writing; autonomy and self-learning
  - d. Place strong emphasis on quality of education in regional languages
3. Invest in high-quality under-graduate liberal education programs (sciences, mathematics, social sciences and the humanities)
  - a. Shifting away from liberal studies will lead to the collapse of professional education - basic academic rigour is provided by disciplinary understanding
  - b. Institute 4-year undergraduate programs that develops 'job-ready' students
4. Ensure that 'professional' courses have a strong element of liberal education
  - a. Situate professional courses in larger social concerns
  - b. They must help students build broader capabilities - not remain narrowly-focussed on technical expertise alone
  - c. Narrow 'skill development' cannot stand outside intellectual and emotional development
5. Ensure liberal education has a robust element of skill/professional competence
  - a. Build a strong connect with the world of work i.e. the ability to 'do' something.
  - b. Curriculum and pedagogy must be relevant to citizenship and employment - prepare young people to contribute to practice/real world issues/research
6. Set up one higher education institution of excellence in every district
  - a. Focus on liberal education
  - b. Begin with educationally backward districts - cover all within the next ten years
  - c. Ensure availability of quality infrastructure, learning resources and faculty
  - d. Institutions should offer an array of courses - pure sciences, mathematics, social sciences, humanities and integrated teacher education
  - e. Quality of under-graduate programs must be such that offering post-graduation can be a possibility - all institutions should have the potential to add post-graduate programs
  - f. Should be subsidized by government till the first degree is obtained
7. Provide strong support for students
  - a. Provide financial support - no student should opt out of higher education because of financial difficulties
  - b. Provide continuous academic support (language, knowledge) to help students achieve curricular objectives
  - c. Ensure availability of counselling and emotional support to help students cope during difficult situations

**Possible alternative structure for higher education**

1. Every child goes up to class 12
2. Post class 12, every student goes through a 2-year liberal education program including the study of a particular discipline
3. At the end of 2 years, students have the following choices:
  - Study social science/mathematics/sciences/humanities for 2 more years
  - Study a professional/ vocational courses for 2 more years
  - Go through a specialized apprenticeship for 2 more years
  - Opt for a professional course like medicine which could need 4 years
4. Graduates can decide what they want to do further - pursue a doctoral degree or look for employment

**4.15. Regulation in Higher Education**

**What the draft says**

- 4.15.1 *An independent mechanism for administering the National Higher Education Fellowship Programme will be put in place.*
- 4.15.2 *A Central Educational Statistics Agency (CESA) will be established as the central data collection, compilation and consolidation agency with high quality statistical expertise and management information system which will be used for predictive analysis, manpower planning and future course corrections. CESA will also develop solutions of geo-tagging of HEIs on various parameters such as, infrastructure available, new constructions and upgradation.*
- 4.15.3 *State Councils of Higher Education will be mandated to monitor periodically the academic standards of universities and colleges in consultation with approved accrediting agencies*
- 4.15.4 *Every higher education institution will have a dedicated website for more transparency disclosing standard information of admissions, fees, faculty, programmes, examination results, placements, governance, finance, business tie-ups, management and a report on academic and co-scholastic activities, as well as other relevant information relating to the institution.*

**Our Response**

The recommendations related to regulation in higher education sidestep major issues. Higher education has a complex governance system, with a multiplicity of statutory bodies and only two accrediting institutions. Given the above, recommendations relating to governance and structures which enable systematic, efficient procedures and coverage of institutions were needed - the document is also silent on autonomy and accountability frameworks for higher education institutions.

The document reiterates the role of State Councils of Higher Education as described in the National Policy on Education 1986 Modified 92. The Rashtriya Uchchar Shiksha Abhiyaan (RUSA) also requires state governments to set up autonomous SHECs as a pre-condition for funding. In such a scenario, governance of higher education, except for centrally-funded institutions of national importance, will be devolved almost entirely to the states. However, only seven states have set up these bodies between 1992 and 2015. The recommendation related to the fellowship programme is most welcome - however, it is not clear whether this is in addition to existing schemes. It must also be strongly recommended that processes for supporting students to successfully complete their studies must also be in place.

### **Our Suggestions**

- I. Ensure clarity on role of the State Councils for Higher Education (e.g.)
  - a. Formulate and review policy and perspective plans for higher education in the state
  - b. Articulate standards for state universities (public and private)
  - c. Serve as a link between school and higher education; between industry and academia; between universities within and across states
  - d. Facilitate research and innovation in higher education
  - e. Facilitate creation of a repository of common resources in local languages

## **4.16. Quality Assurance in Higher Education**

### **What the draft says**

- 4.16.1 *An expert committee will be constituted to study the systems of accreditation in place internationally. It will draw from the experiences of some of the best practices followed by countries having well performing systems and will suggest restructuring of NAAC and NAB as well as redefining methodologies, parameters and criteria.*
- 4.16.2 *Evaluation/ Accreditation details of each institution will be available to the general public through a dedicated website, to enable students and other stakeholders to make informed choices.*

### **Our Response**

The recommendations sidestep the main issues - namely, that only two bodies exist currently for a variety of institutions and the problems associated with current accreditation processes. There is a reference to ranking in the lines preceding the recommendations; however, no reference is made to it in the recommendation - ranking should be completely avoided.

Accreditation should be a voluntary act; its purpose should not be to label or rank but for degree equivalence or certification of professional programmes. Self-assessment against comprehensive criteria is the best option - in this sense, the current practice of NAAC is suitable, but it must be reviewed to make it more meaningful and to help the institution use findings for development.

### **Our Suggestions**

- I. Comprehensive frameworks for assessment and accreditation should be developed
  - a. Institutional standards must be developed - these frameworks must include indicators for inputs, processes and outcomes
  - b. Qualifications frameworks for programmes which outline the knowledge, skills and attributes students need to attain must be developed
  - c. Periodic review of the frameworks should be undertaken to ensure they are aligned to contemporary discourse in education
2. Accreditation should be voluntary and focussed on self-assessment
3. No ranking of institutions or programs should happen

## **4.17. Open and Distance Learning & MOOCs**

### **What the draft says**

- 4.17.1 *An autonomous body, responsible for the promotion, coordination, regulation and maintenance of standards in the ODL/MOOCs system, will be set up. It will prepare norms, standards and guidelines for systemic development and regulation of ODL/ MOOCs. It will also develop a mechanism for recognition, transfer and accumulation of credits earned through MOOCs and award and recognition of degrees*
- 4.17.2 *All institutions offering course and programmes in ODL/ MOOCs mode will develop and standardize programmes based on the national and local needs as per the norms and standards prescribed by the*

*autonomous body referred to in para-1 so as to facilitate recognition and accumulation of credits towards the award of degree.*

- 4.17.3 *A quality assurance mechanism for accreditation of all universities/ institutions offering ODL / MOOCs will be put in place to ensure quality, promote, innovation and reshape and modernize the ODL / MOOCs courses and programmes.*
- 4.17.4 *Learner support services will be institutionalized by all ODL institutions and will include hosting courseware, repositories, Open Educational Resources (OERs), MOOCs, 24x7 help desk services, tutoring and counselling services, conduct of webinars, discussion forum, webcasting, library facility, virtual labs, e-learning modules, delivering of online programmes, providing assignment and timely feedback of performance, online examinations, declaration of results, redressal of grievances, etc.*
- 4.17.5 *The National Institute of Open Schooling (NIOS), in collaboration with Ministry of Skill Development & Entrepreneurship, will redefine itself to address the large potential demand for vocational education. The issues of management, monitoring and oversight of NIOS will be addressed appropriately.*

### **Our Response**

While autonomy and accountability frameworks are needed at every stage in education, having a separate regulatory body for ODL carries the risk of a lower status to continue being accorded to degrees obtained in this manner.

MOOCs are untried in our country on a large scale; their use needs to be carefully studied and extensive trials carried out otherwise they have the potential of perpetuating the inequities of the digital divide.

NIOS is performing a very important role; its needs to be strengthened further as opposed to being converted into an arm of the Ministry of Skill Development & Entrepreneurship.

### **Our Suggestions**

1. The same body should regulate similar programmes whatever be the mode
2. Strengthen NIOS significantly and retain its focus on making school education accessible to those in difficult circumstances

## **4.18. Internationalization of Education**

### **What the draft says**

- 4.18.1 *Selected foreign universities, from the top 200 in the world, will be encouraged to establish their presence in India through collaboration with enabling legislation. Rules/ Regulations will be framed so that it is possible for a foreign university to offer its own degree to the Indian students studying in India, such that these degrees will be valid also in the country of origin*
- 4.18.2 *Since internationalization is a two-way process, Indian institutions will also be allowed to set up campuses abroad, if required, through suitable legislations/ amendments in the relevant Acts/statutes.*
- 4.18.3 *In order to increase acceptability of Indian students abroad and to attract international students, Indian HEIs will be encouraged to work towards internationalization of curricula aligned with international levels so as to make it globally compatible with best ranked institutions of the world. Since many international students come to India for cultural and India related studies, these areas will be developed to meet the needs of international students.*
- 4.18.4 *HEIs will offer language and bridge courses for international students to help them overcome language deficiency and/or difficulties due to higher level of course curriculum.*
- 4.18.5 *Norms and regulations to allow foreign faculty to join Indian institutions of higher education will be reviewed to encourage more foreign faculties join the Indian HEIs. Genuine concerns and difficulties faced by foreign students/ faculty pertaining to visa, registration/ extension of stay and tax rules and regulations will be adequately addressed.*
- 4.18.6 *Internationalization will be included as one of the components for allocating additional financial resources to government-funded HEIs.*

4.18.7 *The government will initiate a dialogue with the countries who have put in place a rigorous, robust and credible system of approval/ recognition/ accreditation/ quality assurance of the HEIs and programmes of studies. An attempt will be made to form a group of such countries which would recognize in their respective countries all qualifications awarded by accredited higher education institutions in member States of this group.*

4.18.8 *Steps will be taken to gradually move from years-based recognition of qualifications to credit-based recognition.*

#### **Our Response**

Mutual academic exchange via establishing a presence in other countries and movement of faculty is desirable. It can be assumed that foreign universities setting up campuses in India, and vice versa, can be a means of offering a wider range of programmes to students, which would lead to diversification of the academic opportunities available to students.

The policy needs to clarify the purpose of having foreign universities in India and whether they will be allowed the flexibility to offer students in the country an educational experience similar to that in their home countries. Recommendations related to the nature of statutory and regulatory frameworks that must be applicable to them, and the nature of collaboration are needed.

To attract foreign students, infrastructure and other facilities are minor issues - what is more important is that we develop the academic reputation of our institutions and develop curricula which will add value to their educational experience. The rest is important but not critical.

Forming a group of countries wherein degrees from specified institutions are recognized can also be mutually beneficial. Visualized appropriately, it can lead to the adoption of new pedagogical approaches, boosting research in cutting-edge technologies and building stronger academic networks between both countries.

#### **Our Suggestions**

1. Cross-border education must align with national policy and statutory frameworks while allowing for diversity and innovation by means of autonomy of institutions
2. Universities should have autonomy in decisions related to programmes, curriculum, assessment, student and faculty exchange, etc.
3. Quality of educational experiences needs to be ensured
4. The arrangement should not lead to further inequities - fees and other costs to students must be considered

### **4.19. Faculty Development in Higher Education**

#### **What the draft says**

4.19.1 *A task force of experts will be set up to study the recruitment, promotion and retention procedures, followed by internationally renowned universities and institutions and suggest measures to promote intellectual and academic excellence in HEIs*

4.19.2 *A national campaign will be launched to attract young talent into the teaching profession. In order to attract young talent into teaching profession, a career growth of research students, such as M.Phil. & Ph.D. scholars, will be created and they will be designated as Academic Assistants and Academic Associates.*

4.19.3 *National and State Training Academies will be set up for organising induction programme of 3-6 months for the newly recruited faculty. It will be mandatory for a newly recruited faculty to acquire a Certificate in Teaching before they formally take up teaching positions in HE institutions. The induction programme will include teaching and research methodologies (flip classrooms, collaborative learning, case approach), use of ICT, curriculum structure and design, sensitisation to gender and social diversity, professional ethics, sharing of best practices and updation of developments in their field of study, etc. Induction training will be followed by an orientation programme of 4-6 weeks at his/ her university to help him/ her learn the culture of the institution, his/ her role and responsibilities, etc.*

- 4.19.4 *The profile of a teacher has undergone tremendous change in light of technological developments, new dimensions of knowledge and changing learner profile. In the changed context, role of learners and teachers will be redefined to promote adoption of a blended model of pedagogy with a combination of self-learning, practical and collaborative learning components. This will also require reforms in assessment and examination.*
- 4.19.5 *A mechanism of assessment of academic performance of faculty including peer review will be put in place so as to ensure academic accountability of public-funded institutions.*
- 4.19.6 *An appropriate mechanism with suitable selection and recruitment policies will be put in place to ensure seamless mobility of experts from other fields, like industries and government, into teaching (and vice versa) by allowing for lateral entry and exit and encouraging secondment/ deputation to work as adjunct faculty.*
- 4.19.7 *Reputed HEIs will be encouraged to set up leadership development centres to offer short-term programmes, for senior faculty and management of HEIs, which will be made mandatory for selection and appointment to higher level leadership positions. These leadership programmes will cover decision making modules, sensitisation modules, financial processes and procedures, management of academic, financial and human resource, conflict resolution, sensitisation towards weaker section, etc. to improve administrative and managerial skills.*

### **Our Response**

The recommendations in this section are detailed and extremely important - attracting talent into the teaching profession; setting up national and state level training academies for induction - certificate of teaching mandatory; orientation of new faculty; leadership programmes for senior faculty and management. It would have been desirable for the document to outline determining processes for recruitment and performance management of faculty in higher education, instead of suggesting that a task force be set up.

However, the central issue of faculty vacancies has been sidestepped – an illustration of the seriousness of this problem is that faculty vacancies were reported to be of the order of 35% in institutes of higher learning under the MHRD in 2015. While recommending attracting young talent into the teaching profession, the policy needed to make recommendations related to the non-availability of suitably qualified persons and removal of procedural restrictions/fund constraints in State universities/colleges.

Another central issue the document has missed is that of institution building - the culture should be such as to attract and retain quality faculty. This is especially relevant since a lack of ‘academic culture’ is reflected in most of our institutions - from institutional planning to classroom processes, we appear to be functioning without a connection to our purpose.

Another gap is that while recommending assessment of faculty performance to ensure ‘academic accountability’, the document is silent on processes for supporting continuing professional development. Also the development of a framework of standards for faculty in higher education is imperative, given the recommendation of lateral entry and exit from government and industry, and secondment/ deputation to work as adjunct faculty.

### **Our Suggestions**

1. Professional standards for faculty of higher education institutions should be developed
2. Vacancies in higher education institutions should be filled on priority.
3. Prepare Faculty for Higher Education
  - a. It is assumed that higher education faculty have an understanding of teaching and learning/pedagogy even though they have never been trained for it
  - b. All faculty of higher education institutions must go through pedagogical orientation before they begin teaching

4. Academic institutions must promote an academic and enabling culture that encourages learning, research, reflection and connection to practice; collaboration and dialogue are critical components of an enabling culture.

#### **4.20. Research, Innovation and New Knowledge**

##### **What the draft says**

- 4.20.1 *Over the next decade, at least 100 new centres/ departments of excellence, in the field of higher education, both in the public and the private sector, will be established to promote excellence in research and encourage innovations. Private trusts, philanthropists and foundations will be given freedom to establish such Centres of Excellence.*
- 4.20.2 *A clear reorientation of research agenda of National University of Educational Planning and Administration (NUEPA) will be undertaken to reflect actual issues on the ground.*
- 4.20.3 *Steps will be taken to promote generation of new knowledge and their applications and introduction of these new domains into the curricula of higher education to consolidate and strengthen India's position as a soft power.*
- 4.20.4 *In order to promote innovation, creativity and entrepreneurship, 100 more incubation centres will be established in HEIs over a period of next 5 years.*
- 4.20.5 *International collaborations and networks will be promoted for developing human resources required to sustain new knowledge with special focus on inter-disciplinary research and studies.*

##### **Our Response**

The pre-requisites for these recommendations are institutional autonomy, faculty professional development, curricula with comprehensive aims, focus on liberal studies with core/foundation courses which develop necessary perspectives in all courses, including technical programmes.

The critical issue is developing a research orientation in all individuals and in including local knowledge and resources in our curriculum, while focusing on holistic development of our students, not limited to skill development. Our students should be able to continue learning throughout their life and our institutions to explore new areas. The expectation from faculty members that research and teaching are mutually reinforcing and not exclusive activities must be explicit. Besides any research that faculty may choose to undertake, research studies should be undertaken across departments at the institutional level.

While responsibility for funding research should remain with the government, funding and collaboration with private partners should be encouraged if it provides institutions with necessary support and knowledge; however, the danger of focus on 'marketable' research should be avoided; partnerships could be in the form of research contracts for specific areas and time periods between the institution and private players. Regulatory frameworks could be developed for these collaborations, especially with reference to intellectual property rights over research results and dissemination for the larger benefit of society. Research carried out by higher education institutions should be public property and be used for the larger benefit of education and society.

Finally, we need to create an ecosystem that facilitates research and innovation in a continuous manner. We must revive the culture of our Universities to make research an integral and not exclusive activity. This will not only help create new knowledge but also improve teaching standards.

##### **Our Suggestions**

- I. Focus on research in science, social science and the humanities
  - a. Research grants are needed for humanities, social sciences and basic sciences especially since most fundamental research, especially in the social sciences, has happened in countries other than India
  - b. We need to support research not only in the Indian context but also to strengthen local knowledge.
  - c. Interdisciplinary research must also be encouraged.

2. Draw up a clear roadmap on capacity building in research in all institutions
3. Review the status of national laboratories regularly with respect to infrastructure and quality of research
4. Priority could be given to finding indigenous solutions to local problems - while research in fundamental areas in the sciences and humanities also need to be addressed especially in the Indian context
5. The pressure of ‘outcomes’ needs to be removed from research grants – this can prove counterproductive. While internationally (and in India) some research grants are provided on a competitive basis for specific projects/programmes, it is important that a basic research grant be given to all institutions.

#### 4.21. Financing Education

##### What the draft says

- 4.21.1 *The government will take steps for reaching the long pending goal of raising the investment in education sector to at least 6% of GDP as a priority.*
- 4.21.2 *In order to supplement the Government efforts, investment in education by private providers through philanthropy and corporate sector responsibility will be encouraged. The Government will take steps for incentivizing private sector investment in education, such as, tax benefits and inclusion of education within the definition of infrastructure. In general, public funding will continue for core activities, whereas other functions can be through private funding. Private funding and FDI for R&D and other quality enhancement activities in education institutions will be pursued as an important strategy for mobilizing financial resources.*
- 4.21.3 *Instead of setting up new institutions, which require huge investments, priority of the Government will be to expand the capacity of existing institutions.*
- 4.21.4 *HEIs funded by governments need to find ways of increasing their revenues through other sources, such as, alumni funding, endowment funding, tuition fee enhancement along with fee waiver for disadvantaged sections, and private investment.*
- 4.21.5 *To make the present scheme of education loans to the economically disadvantaged sections more effective, the scheme will be modified to facilitate relaxations for collateral, lower interest rates and higher moratorium period from the present one year to two years/rolling moratorium.*
- 4.21.6 *In order to encourage excellence and efficiency, performance-linked funding of higher education institutions will be implemented.*

##### Our Response

The figure of 6% of GDP needs to be re-assessed given current status of education and factoring in inflation. In 2005, the Tapas Majumdar Committee Report cited various reports/studies to make a case for 8-10% of GDP to meet the then requirements (exclusive of contribution by private sector, community, parents and students).

Also, for the policy to recommend that the government abdicate funding of ‘other functions’ to the private sector or to higher education institutions is worrying, especially in a scenario where some aspects of schooling have been ‘outsourced’ by some states. Core activities need to be defined - would these include setting up schools/institutions?

A recommendation related to developing a framework for public-philanthropic partnership would be more in order with the caveat that criteria for identifying philanthropic partners with genuine intent be identified.

It must also be pointed out that the document is silent on the policy framework is silent on recommendations related to fund disbursement, utilization, monitoring, especially managing leakages

##### Our Suggestions

- I. Spend at least 6 per cent of GDP on education - increase expenditure on education incrementally every year

2. The Government should take complete responsibility of school education - philanthropic models can be considered for higher education
3. Prioritize spending based on the following:
  - a. Recruitment of teachers, teacher educators and faculty of higher education to ensure a full complement in all institutions
  - b. High quality infrastructure and learning resources (especially classrooms, laboratories, libraries) for all schools with a special focus on composite schools
  - c. Transport allowance for young students to access composite schools
  - d. High quality infrastructure, resources and faculty for setting up a good college in all educationally backward districts
  - e. Operating and maintenance/upkeep budgets for all institutions
  - f. Salaries of ECE teachers on par with others
  - g. Increased funding for in-service teacher development (change current per teacher per day norm)
  - h. High quality teacher education must be heavily subsidized by the government
  - i. Fund increased capacity in areas that contribute to national development e.g. Schools of Education, Medical Education, Urban Planning
  - j. Public money should not go into the following sectors: engineering education, business management, professions like fashion technology or design - the current institutions can continue but new ones should not be invested into
4. Make planning meaningful in terms of 'real' decentralization
  - a. Ensure development of rational and contextual guidelines, transparency and information sharing
  - b. Ensure that institutions at the Centre, State, District and sub-district levels 'talk to each other'
  - c. Ensure that school development plans and school needs are reflected in planning
  - d. Link the planning and review processes across levels – avoid duplication and overlap
  - e. Link operational planning to academic planning
  - f. Ensure **funds** are allocated, disbursed and utilized as per plan
  - g. Make funds available at the right time of the year (not as the year ends)
    - i. Allow for flexibility for fund reallocation (with checks and balances in place)
    - ii. Carry out systemic assessments against rational specific criteria to check for integrity of plan implementation

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