**All India Peoples’ Science Network (AIPSN)**

**Draft National Education Policy (NEP) 2019**

**Feedback**

**Introduction**

The Kasturirangan Committee, hereinafter referred to as the committee, has contributed a 484 pages document with main part being 398 pages covering 23 Sections and 38 pages with 14 Appendices on education policy. This committee was formed by the Modi Government 1.0 to follow up on the earlier report of TSR Subramanian Committee whose recommendations were discussed in Parliament on 10th Aug 2016. The Modi Government 2.0 is actively following up this time on the proposals incorporated by the committee in the Draft National Education Policy 2019. This is already evident from the pronouncements of the Finance Minister and the allocations made for all the different proposals in the first budget of the Union Government.

The budget of FY 2019-20 incorporates allocations made by the Union Government for the National Research Foundation and the programme called “Study in India”. The National Research Foundation (NRF) proposes to fund, coordinate, and promote research at the college-level. In this connection, the Finance Minister announced that the funds available with all the socio-economic ministries will be now integrated for disbursal through the NRF mechanism. The NRF will function under the gaze of the Prime Minister. The Study in India programme has a focus on bringing foreign students to make India a “hub of higher education”. The Minister reiterated that the University Grants Commission (UGC) will be replaced by a Higher Education Commission of India (HECI). “Regulatory systems of higher education would be reformed comprehensively to promote greater autonomy and focus on better academic outcomes”[[1]](#footnote-2). In the domain of education and research, this kind of centralization is not in place even in the countries that follow a presidential form of government.

The AIPSN believes that the Union Government is viewing the completion of the process of public feedback as merely a formality and is not sincere about obtaining the inputs from the people of the country. The Finance Minister has already gone ahead with the planning and implementation of National Research Foundation NRF) and “Study in India” programme at the level of the allocations. The Ministry of Human Resource Development (MHRD) is reported to have prepared the plans to implement National Tutor Programme (NTP) not only for school education but also for higher education. The National Tutor Programme is a highly controversial programme. The Modi 2.0 government wishes to facilitate the entry of volunteer teachers from among the students, retired army officers and political cadre of the ruling party into the schools and colleges as teachers who are not qualified to teach at all anyone in the school or college. These proposals are under perusal for the implementation of MHRD even when the feedback deadline is July 31, 2019. The Union Government has not till date cared to translate the document in the national languages of the Indian nation to obtain the public feedback from all the regions and the people.

The AIPSN has prepared its own feedback document on the basis of the inputs drawn from the experts, academics and researchers working for several years in the field of education. Those providing the inputs to the AIPSN have actively worked in the field with the AIPSN member organizations. The clear message from the feedback obtained is that even when these experts have chosen to acknowledge at times some kind of merit in the diagnosis or in the observations made by the committee, it has been made clear by them that they are not ready to endorse the committee report. This is because the committee has made many proposals that are dangerous, impractical, contradictory and illogical. They have argued that the government should be prevented from taking forward the implementation of the proposals of the committee in a number of areas indicated by them. Alternate proposals have been advanced by them for the perusal of the government and citizen groups for consideration.

The AIPSN would like to start by stating that the objective of seeking feedback on the document from the nation is clearly defeated by the actions of the Union Government. The Modi government does not have an open mind. The Draft National Education Policy, 2019, hereinafter referred to as the policy, is not even ready to embed the traditions, ethos and values of freedom movement as the foundational values to be learnt and taught in India. Secularism, socialism, equality and federalism have been ignored and instead the policy accords primacy to the value of true rootedness and pride in India. Keeping in view the state of education and the approach taken by the Modi Government to address the challenge of revamping of the structures and the purpose and content of education the AIPSN has chosen to present its own collectively arrived at view not para or section or page or chapter wise but part wise on the proposals made in the Draft National Education Policy 2019. The AIPSN demands that the MHRD should allow the people to upload their views and suggestions on the feedback website in summary form and not just para or section or page or chapter wise.

The AIPSN notes with much concern that the committee has been extremely selective about incorporating the Indian Constitutional values and mandates in the Draft National Education Policy, 2019[[2]](#footnote-3). The policy has chosen to completely renege on the constitutional requirement of adhering to the balance of power between Centre and States. In Chapter 23, the policy proposes to establish a highly centralized Rashtriya Siksha Aayog (RSA) to work under the gaze of the Prime Minister. The vast Indian system of education catering to the needs of diverse regions and populations of a country of sub-continental size cannot be productively transformed with the powers of the Prime Minister. The Prime Minister has been accorded unlimited powers to make appointments, approve programmes and control by default the bodies meant to guide the system of education[[3]](#footnote-4). Not only the policy has given all the relevant powers to the Prime Minister but also a major step backward will be implemented to remove all the relevant safeguards built by the Indian people through their democratic struggle against the known tendency of the central and state governments to centralize the management and administration of educational institutions.

The AIPSN is concerned that the committee has created wittingly or unwittingly through its proposals the space for a full-scale political capture of the education system by the political party in power at the Centre and State level. At the level of the institutions of higher education the Vice chancellor has been designated as chief executive and given all the powers of management in the policy[[4]](#footnote-5). The policy proposes to do away the structures available for the participation of elected student and teacher associations in the decision-making process instead the policy asks the faculty and students to go back to the mechanism of grievance redressal committee. The political capture will become possible through the structure of RashtriyaShisksha Aayog and the undemocratic governance system at the level of individual institution. This tendency will also gain strength through the proposals of National Tutor Programme, home schools, volunteer teachers, community schools and alternate low-cost models of school education, philanthropic funding, private financing, market forces (read corporate interests) running not-for-profit institutions[[5]](#footnote-6). Rather than strengthening the norms and standards provided in the Right to Education (RTE Act the policy has chosen to do way with the norms and standards prescribed by the RTE Act to facilitate formally the entry of unqualified volunteer teachers and shishu mandirs and ekalvidayalas into the system of school education.

The AIPSN notes with concern that actually through the pathways chosen for financing and governance itself the policy is structurally and institutionally closing the door on the social contract entered into by the Indian state with the people of the country and with the teachers and students for the expansion of the system of education for progressive social transformation and self-reliant development. The social contract included the commitment of the Indian state towards the safeguarding of autonomy of educational institutions by involving teachers and students in the process of decision making on the development of norms and standards of accountability[[6]](#footnote-7). Adopted after the two decades of post-independence struggle this social contract enabled the teachers and students to initiate their participation in a process of transformative change in the social relations of education, research and outreach missions[[7]](#footnote-8).

The social contract included the commitment that the Indian state will take the main responsibility of funding education. The Indian state will ensure that the system serves the purpose of social transformation and self-reliant national development. During the decades of seventies and eighties the faculty and students won the right to participate in the bodies governing academic and administrative affairs at the level of the individual institution in the sphere of higher education. This social contract was utilized to put in place the principle of reservation in admissions and in recruitment of the teaching and non-teaching staff to increase the participation of disadvantaged sections in the education system. This social contract also allowed the teachers and students to gain some influence on the content and process of education in school system, universities and colleges and to secure the autonomy of educational institutions from the interference of government in power in the decision making on curricula, syllabus and examination system. This social contract was used to redefine the campaign for literacy and continuing education programmes during the decade of nineties. This social contract enabled the people to secure the formation of school management committees and the minimum norms to be followed by the schools under the right to education (RTE) Act during the first decade of 2000s. This social contract enabled the progressive changes in educational curricula through the adoption of a new National Curriculum Framework in 2005.

The policy reneges on all of these commitments to favour the party in power to the takeover from within and allow the Modi Government to do away with all the commitments were given by the previous governments in the parliament. Most of these safeguards have had the consent of the members of parliament of the party in power. In the past, the party in power has been opposed to the centralization of powers. But now the Prime Minister, for the first time in the history of post-independent India, would be able to gain almost complete control. The mechanisms of grant giving for education, research and outreach, accreditation and ranking, eligibility, qualifications and recruitment of teachers and students have been put under his control.

The proposals that can allow a full-scale political capture of the education system are unacceptable to the AIPSN. Education demands academic freedom from fear and profit. Public purposes need to guide the teachers, learners and society rather than the narrow private interests, be commercial or ideological. While this retrogressive and unconstitutional step may suit for the time being the party in power but since the step can damage the education system the democratic movement is committed to oppose the Draft National Education Policy 2019.

**Processes of the takeover from within**

The AIPSN notes with concern that the ideas of institutional autonomy and accountability are being reconfigured to gain a compliant, confirming and loyal intelligentsia. It is this process that will allow the RSS and the Modi Government to practice the state takeover from within. The paths of extreme centralization and extreme privatization will be implicitly driving the system towards unfreedom and social and ideological conservatism. The policy recommends not only a shift to the principles of market fundamentalism but also complete reliance on socially conservative traditions, ethos and values. In order to govern the content and process of education and redefine the ideological role and political function of education the policy has proposed to undertake structural changes to make this shift possible. The proposed structural change will not only occur via the tight grip of the RSA and the Chief executives and the boards to be appointed under the gaze of the Prime Minister without any kind of check and balance being provided in the system of governance but also through the pathway of extreme privatization wherein the corporate and socially conservative entities will have the capacity to support the takeover of the state by the Modi Government from within.

The pathway of extreme privatization will also be institutionalized through the proposal of the committee to allow home schools, low cost schools, caste and religion based community schools and through the proposal to dismantle the affiliating university framework of higher educational institutions. The committee has chosen to replace the existing framework of higher education with a three Tier-system of HEIs wherein a part of the affiliated colleges numbering more than 40,000 will be under the hammer. Many of them will have to remain in indeterminate state till they are able to mobilize the wherewithal to gain the status of autonomous degree granting higher education institutions (See Chapter 10). As it is in these autonomous colleges that the policy proposes to locate the third Tier HEIs they will provide the main bulwark of the Indian system of education for the path of extreme privatization.

The AIPSN believes that the third Tier HEIs will be the all pervasive degree granting factories / diploma mills of the country providing education in theory to the unrepresented groups or the disadvantaged sections. These mills will help the government to fulfill the higher education target of 50% gross enrolment ratio (GER) by 2035. The third-tier HEIs will be mostly self-financing, raising funds from private interests and meeting their expenses by raising fees from students. Autonomy from the governmental control will be in theory. In practice, the complete control over education of the market mechanism will be the new policy. To a significant extent, this will be the story of all types of higher education institutions to one or other degree. It is already the story of professional and vocational educational institutions. Even the Tier-I institutions will have also no immunity. No one will escape from the tyranny of market, traditions and centralized authority in practice. The Draft National Education Policy 2019 will be a policy of social exclusion as well as adverse integration called inclusion.

The AIPSN also expects in the near future a huge growth in the number of community-controlled colleges (Hindu, Sanatan Dharma, Arya Samaj, Brahmin, Rajput and Yadav or Sikh, Muslim, Christian and Parsi colleges). These institutions will now be forced to align far more with the ruling party. Such kind of private institutions exist in large numbers. Their political capture will be almost complete. It is now the political capture of educated minds through these institutions at stake. Today as these institutions do not have the degree granting status and are an integral part of the affiliating university framework the problem of political capture of young minds is perhaps more manageable. The story will be no different in the case of school education. The policy also proposes to create the space for the system of home schools, gurukuls, paathshalas and low-cost private schools (Chapter 6, Equitable and Inclusive Education p 137-156). The policy allows alternative models of education such as gurukuls, paathshalas, madrasas, and home schools. The policy speaks of a flexible market model with minimal regulations to give greater flexibility and to create greater choices for students and healthy competition among schools. The policy chooses to promote multiple alternate models without fulfilling even the Right to Education (RTE) Act norms and standards to provide legitimacy to RSS schools, which are geared to cultivating ideologically speaking conservative values.

The AIPSN believes that the proposed pathways of “extreme privatization” and “extreme centralization” must be rejected. These pathways are unacceptable to the democratic movement working actively in the domain of science and education because of the possible disastrous adverse impacts of the policy on the perusal of science, education, ethics and values. India had up to now a countervailing force through the publicly funded universities, colleges and schools; but this policy is going to allow the party in power to undertake a full-scale political and ideological capture of the education system. The pathways of extreme privatization and centralization will result in complete subversion of the structures and processes of education, research and innovation and permit the ruling party in power to cultivate the ideology of social conservatism. These shifts would result in subordination and silencing of the dissenting sections of faculty, students and administration at the individual institutional level.

This kind of regressive structural shift is not conducive for either solving the problem of growing wastage or taking up the challenge of improving the health of the education system in the 21st century. Private funds to be dispersed by and mobilized from the communities and philanthropic sources for the realization of the institution development plans can do permanent harm. Philanthropic sources have been seen by the policy as an important financing mechanism[[8]](#footnote-9). The policy of financing will allow the Indian state to make all the institutions of school and college system dependent on funds tied to the private interests which have shown through their past predatory track record that the system of 21st century cannot be built on the funds to be provided by the finance capital, merchant capital and big business which has not only failed the traditional and conventional sectors of Indian manufacturing but also the new and emerging systems of technology development, innovation and production

The cumulative grip of extreme privatization and centralization will actually ultimately allow the party in power to control the processes of integration of education, research and outreach missions and help the party in power to implicitly and explicitly realize their specific political ends and also the market forces to attempt social appropriation of publicly funded knowledge structures. The big business will gain necessary control of education, research and innovation activity and would be the biggest beneficiary of this structural shift. The negotiations of the faculty, students and administration with the government as well as the private interests over the role and functions of education, academic and industrial research, fundraising, management, policymaking, citizenship, community transformation, and academic entrepreneurship will have to take place under the gaze of the Prime Minister, the market mechanism and the gatekeepers of Indian traditions who have failed the economy. The economic slowdown will make the philanthropic and private financing to take interest in education as an investment for profit. Since the plans of economic take off are the basis of financing proposals of the committee the AIPSN believes that the increased public funding commitment to the extent is spoken off is not going to be realized. The first budget of the Modi 2.0 Government has not increased the public funding for either the schools or the universities.

The Ministry of Human Resource Development consists of two departments: (i) school education and literacy, and (ii) higher education. In 2019-20, the Ministry has been allocated Rs 94,584 crore. In 2019-20, the Department of School Education and Literacy has been allocated Rs 56,537 crore. In the last 10 years, apart from 2019-20, the highest allocation was given in 2014-15 at Rs 55,115 crore. Note that in 2015-16, the allocation was reduced by 25%. The allocation has been on an upward trajectory since 2009-10, the Compound Annual Growth Rate (CAGR) has been 7%. It may be noted that Samagra Shiksha which subsumes Sarva Shiksha Abhiyan (SSA), Rashtriya Madhyamik Siksha Abhiyan and Teacher Education has been allocated Rs 26,129 crore against the demand of Rs 37,048 crore. Autonomous bodies like the National Council of Educational Research and Training and Kendriya Vidalaya Sangthan saw a decrease in their allocation by 3.5% from the revised estimates of last year and were allocated Rs 8920 crore in 2019-20. Scholarships saw a decrease of 15.7% in its allocation in 2019-20. Note that, the money for scholarships is supposed to go to one lakh meritorious students of economically weaker sections. The Ministry provides Rs 6000 per year as scholarship and this allocation has been reduced in the latest budget.

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

Expenditure on education (centre and states) as a proportion of GDP has been around 3 per cent during the period 2014-15 to 2018-19. Out of this 3% expenditure, roughly 1% is spent on higher education. The distribution of public and private institutions is skewed. Enrolment in public universities is concentrated in conventional disciplines (arts and sciences). Private institutions offer technical education, and it is to be noted that the lack of employable skills in students of technical education is an important issue. While the Draft National Education Policy 2019 has chosen to pave the way for the path of extreme privatization, but the deceptive mention of the government will be enhancing public funding is only an empty promise that is quite clear from the latest budget allocations. Further the policy has clearly stated that the committee will not do anything to regulate tightly fee structure of the private institutions.

**Profit from education encourages extreme privatization**

The AIPSN believes that the policy proposes to embed the system of education through extreme privatization in an institutional arrangement where the owners of finance capital will be able to ultimately push their way into education. The policy opens the front door to private philanthropic financing, foreign direct investment and international funds for education and research for all possible tasks of education. Private finance will be controlling the directions and magnitude of investment of producers as well as of users of education system. Public investment was playing the role of driver and will now end up on the back seat. Educational institutions will have to depend on multiple private sources of funds to survive and develop. Private interests will have the license to directly interfere with the agenda of education and research. Consumers will be the students paying for the price of degree. Customers or users of competencies of faculty and students within industry and government will also suffer and lose.

There would be education shops producing paper degrees, diplomas and certificates and making the system costly and inaccessible for the economically and socially disadvantaged. Highly differentiated products in the form of paper degrees and diploma certificates from these colleges will be the predominant output. The dissatisfied producers, consumers and customers seeking return from their own private investment and competing in the market for the access to education system would be actually the main outcome. Students will be competing for gaining seats in the privately-run colleges amidst uncertain job market. Faculty will be focused on saving their contractual jobs and concentrating merely on the functional aspects of quality to survive in the job market. Education institutions would have difficulty in incorporating the public purpose (be human and social transformation or critical thinking). Ultimately the system of education would not be in existence to serve public interest. In the case of several domains of technical education-engineering, medicine, management and teacher education there have been a plenty of market failures. Closure of higher education institutions is today understood as only market failures. But these closures have a huge social cost and need to be seen as a policy failure as well as a political failure.

As far as the system of knowledge production and utilization is concerned, through these new structural rigidities, there will be only the reinforcement of existing barriers of caste, creed, gender and class. Furthermore it would become even more difficult for the system to realize the possibilities of place and field specific integration of education, research and outreach. Higher education institutions (HEIs) would have more barriers to cross to harness the latest advances in science, technology, social sciences and humanities for the benefit of public purposes and nation building. The consequences of these shifts will prevent the disadvantaged sections from upgrading their livelihood prospects in newer and emerging areas of employment. In many regions, the policy will deprive the producers and users the freedom to undertake ultimately multi-disciplinary collaborations for the co-design of solutions for the benefit of place / site specific goals of egalitarian, sustainable development and of progressive social transformations.

**Fear, loyalty and political capture**

The AIPSN believes that the pathway of “extreme centralization” of education has been selected with the hidden curriculum of forcing on the system of education fear of the authority and loyalty to the government. The plan of political capture is altogether a completely new element in the unfolding story of education. The ethos and value of freedom movement provided the safeguard to some extent in the earlier periods against centralization. The new policy is dangerous, impractical, contradictory and illogical at the same time. The policy is proposing to structurally trump the Centre-State relations, Central and State legislatures adopted statues and regulations. The policy will render the statutes adopted by the parliament and state legislatures ineffective in practice. The Rashtriya Siksha Aayog (RSA) will harm the system of governance in more than the ways that are today even beyond our comprehension or unthinkable. The centralized system of education will be undemocratic, inefficient, rigid and ineffective by design. The extreme centralization of policy and decision making will drive the system of education to observe conformity to the dictates of political establishment in power, create fear and exercise counterproductive political influence on the everyday functioning of the education system in practice. The AIPSN believes that the Prime Minister (PM) has been offered unconstitutionally and wrongly all the powers to envision, steer, coordinate and manage the system of educational institutions. It is not however difficult to think that how the vested bureaucratic, religious and commercial interests would be enjoying full freedom with full patronage of the prejudiced and biased political intermediaries, and all of this will happen under the full gaze of Prime Minister.

The AIPSN believes that the logic of extreme centralization is also going to end up in chest thumping by the government to make false claims to maintain its grip over the masses. It has happened in the first budget of the Modi 2.0 Government. The post-truth claim that how the Prime Minister has transformed the system of education and that how the critics of the Prime Minister are only contrarians and professional pessimists would be the meta- narrative of the political establishment. The elites, middle classes, public representatives would be asked to take false pride. However, it is our understanding that privatized educational entities would be satisfying the regulatory institutions non-transparently by offering commercially audited statements. They would only be meeting on the surface some standards of presumed quality. The quality would not mean anymore educational institutions actually in practice serving the public purpose, be relevance and excellence or social transformation or national development.

**Towards a new political economy of education**

Much of the harm will come from the dependence of the new political and economic order on private finance and religious organizations. A new political economy is in making in the domain of education. In practice, the new political economy will determine the quality of and access to education and research for the unrepresented groups and disadvantaged sections. Evaluation of the performance of institutions based on the philosophy of “new public management” with the boards/committees of institutions and agencies completely dominating the evaluation process and bureaucratic and commercial interests guiding the academic outcomes will be the new scenario if the Draft National Education Policy 2019 is allowed to be implemented.

**Policy lacking in rigour**

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

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

**Impossible deadlines**

The real options available to deal with the challenges of governance of education have not been duly assessed in the rush to privatize and centralize the governance. The pathways have been selected to guide the process of transformation of the system of education to suit the whims and fancies of the government in power at the Centre. The committee has failed to show an open mind. The policy has been prepared through a flawed process. Neither the academics researching education nor the democratically elected representatives of students and teachers have been listened to before recommending the changes. The policy has ended up making several illogical, impractical and dangerous recommendations.

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

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

The policy recommends to the individuals, be students or faculty, to utilize the ineffective grievance redress mechanisms. It is not that these mechanisms have not been tried in the past. These mechanisms do not work to take care of the distortions that can set in within the educational set up at the level of the policy making and decision making. Further the trouble is also that the faculty and students are regularly asked not to criticize because the criticism of the students and faculty is undermining India. Particularly when it is troublesome and uncomfortable for the powerful organizing and protesting are being called anti-national. There is a clear confirmation of the above stated overall assessment from the domain specific evaluation of the policy recommendations.

**School education**

The AIPSN believes that the committee has chosen to create proposals by design that would allow the government to make a shift to even the schools run from homes with unqualified teachers. The committee has a major chapter on technology in education more with a view of reducing the reliance on such teachers and has failed to take a comprehensive view on the role of technology in education. The policy discourages democratic participation of unrepresented groups and disadvantaged sections of the parents of students in the decision making. The constitution of SMCs will not allow these sections to influence the system. The policy is in favour of allowing alternative models of education such as gurukuls, paathshalas, madrasas, and home schooling (p.71, Chapter 2-3.12). The policy speaks of a flexible market model with minimal regulations to give greater flexibility and to create greater choices for students and healthy competition among schools. The policy chooses to promote multiple alternate models without fulfilling even the Right to Education (RTE) Act norms.

The AIPSN notes with much concern that thousands of schools have been closed or merged in different states on the instruction of Niti Aayog[[9]](#footnote-10). But the policy gives an open license to the policymakers to include the huge industry of low-cost private schools, and the largest network of Rashtriya Swayamsevak Sangh schools, including its single-teacher EkalVidayalas in predominantly tribal regions, for which multiple pathways to learning through non-formal methods, technologies and National Institute of Open Schooling courses. The policy is framed with a view to open up the space for a larger participation of private sector. The policy has ended up laying the ground for the complete destruction of publicness, academic freedom, role of teacher and democratic governance of the system of quality education.

The policy has chosen to move away from the concept of common neighborhood schools. The proposals of remedial instruction aid programmes (RIAP) by unpaid volunteers, the service of army officers, locally available social workers, women and qualified people make a mockery of the big talk of improving “teacher education” and of recruiting “qualified teachers” to revamp the system of school education. No class/grade specific teachers are proposed in the policy. The policy recommends the implementation of National Tutor Programme (NTP) “where the best performers in each school will be drawn in for up to five hours a week as tutors during the school for fellow (generally younger) students who need help” (p. 60-Chapter 2-2.5). The committee forgets that the under achievers need to be taught by qualified teachers having proper training and maturity. The committee does not even ask from what kind of social backgrounds the so called best performers and underachievers may actually belong in all the different regions of this country.

Equality of outcomes of National Curriculum Framework 2005 is replaced by mere access and participation without linking equality in education with the quality education. Universalisation of education and quality in education are regarded as two opposing needs. While on one side the committee has argued for reducing the curriculum load, but also at the same time the policy has chosen to include the language learning load to more as well as classical languages like Sanskrit. The policy needed to attend to the promotion of mother tongue and national and local languages. But the committee has chosen to load the education system with the classical language like Sanskrit at the school stage. It is not desirable to load the young ones with a burdensome load of language learning for no rhyme or reason. The policy also recommends that the core components of the text books will be prepared centrally. The states are only permitted to adapt the centrally prepared books. Private agencies are also permitted to write and introduce the books in this manner.

The policy does not commit minimum support for the majority of the students, proposes however the principle of more output from lesser input. The committee proposes school consolidation and rationalization-another name for closure and merger of schools. This is a clear prescription to handover the schools to school complexes to be built and run by the real estate builders. These are plans for education corridors and education cities. The insertion of corporate into school domain through this new route is also a step in the direction of extreme privatization.

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

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

**Early Childhood Education**

The policy proposes to extend RTE from age 3 to 18, which is certainly welcome, but it is unacceptable that the age group of 0-3 is completely omitted. This omission will particularly affect adversely the inclusion of the children of disadvantaged sections. Furthermore, the policy has chosen to dilute the commitments made with regard to the observance of minimum norms and standards by all types of public and private schools under the right to education (RTE) Act as adopted by the Indian parliament. This dilution of the RTE Act in the policy will particularly increase the number of school dropouts among the poor people. The policy will not help the country to reduce the student wastage. The policy provides public patronage equally to both public and private institutions at all levels. The policy does not prioritize the role and function of publicly funded school education to promote class mobility and equality in the Indian society. The policy will ultimately prevent the country from also reaping demographic dividend.

**Higher education**

The AIPSN believes that the policy fails to address the system building for higher education with a constructive and progressive approach. First of all, the route of dismantling rather than strengthening the affiliated colleges in an organic way has been adopted with the political intention of privatizing the system of higher education. Second, the three Tier system of higher education is clearly a poor substitute for achieving either excellence or relevance in the existing system. Third, while the policy sets up an ambitious gross enrollment ratio (GER) target of 50% by 2035 in the case of higher education but how the target will be achieved without binding the Union Government to making funding commitments and taking relevant for the removal of mismatch that exists between the demand and supply side of higher education for the disadvantaged sections in particular. Fourth, since there is the problem of jobless or job loss growth that cannot be addressed by the policy on education alone, and however has a definite connection with the failure to produce relevant competencies among the out-turns the committee has missed the opportunity to address what has to be done to strengthen the linkages of education with public employment to give the system of education the wherewithal to give work experience and reduce the wastage.

While the policy mentions about how multi-disciplinary education is necessary to enable the building of competencies required for addressing the complex and wicked problems of urban planning, water governance, management of energy, transport and environment, but the policy has no definite binding suggestion to make to the government. It is clueless about how the faculty and students would be given the wherewithal to gain the relevant experience and produce useful knowledge to build multidisciplinary collaborations and tackle the concerns of employability in a systemic way. Note that, presently all of these domains are tackled within the domains of public employment. The policy could have easily addressed this connection if only it had thought concretely about the mechanism of public employment of three to five-year duration. Public employment with full remuneration can alone serve the public purpose of involving the educational institutions to participate in the grand challenges that are mentioned by the committee and need immediate redressal. This kind of policy instrument will allow the students and faculty to participate in an organic way and build their competencies. They will be able to contribute systematically to meet the challenges of research, teaching and outreach. It is unfortunate that the policy did not think about how to strengthen the system of teaching universities or the affiliated colleges in an organic way. Instead the policy has chosen to focus on how to whittle down or shut-down the system of large affiliating-type universities. The policy has ended up making recommendations that are in practice going to negate the potential. It is possible to pool resources and improve the standards of affiliated colleges. Note that, the policy is completely geared to getting ready to creating space for extreme centralization, extreme privatization and social bigotry.

**Crisis of public purpose**

The AIPSN believes that the proposed three-Tier system of higher education institutions does not provide actually a solution to the crisis of purpose, quality, funding and governance that has come to afflict the system of education[[10]](#footnote-11). The policy has chosen to conceptualize the Tier I HEIs as research universities. The policy expects that, over a period of two decades, a couple of institutions, say 150-300, will belong to the Type I category, and each will aim for on-campus enrolments between 5000 to 25000 students. They will aim to become world-class research universities and compete with global institutions. Note that, these research universities would be granting undergraduate and post graduate degrees as a merit elitist good[[11]](#footnote-12). Only a small section of student body will get admission. There will be a coaching industry to help this small section. Note that, however the conception of research universities has only envisaged undertaking research without even thinking about how are these institutions going to integrate research, teaching and outreach missions.

The Tier II HEIs will be just teaching universities without any kind of linkages with research and outreach missions, many of the Tier II universities are state level institutions supported quite miserly by state governments. Teaching universities will focus primarily on high quality teaching process across disciplines and programmes, including undergraduate, masters, doctoral, professional, vocational, certificate and diploma programmes. Note that, in a contradictory, impractical and illogical way, the policy also adds that teaching universities will also be significantly contributing to cutting edge research. High quality teaching without research and funds is a pipe dream. Although the policy promises to check profiteering using existing laws diligently, but see the details of the existing sources of private funding in the case of state universities in five states (CPRHE, NUEPA, 2017 study).

The Tier III HEIs, as conceptualized in the committee report, are expected to graduate to degree or diploma or certificate granting autonomous colleges. The AIPSN believes that in practice these colleges will not get reduced to substandard degree granting factories. Autonomous colleges without any kind of public funding cannot be expected to make any kind of significant contribution to the challenges that the country faces and can address only through the expansion of good quality higher education. In fact, the Tier III institutions are only expected to contribute to meeting the target of 50 % GER by 2035. The policy recommends that the proposed three-Tier system should also be including the domain of vocational and technical education as an integral component of higher education. Note that, in a contradictory, impractical and illogical way, the policy also adds that over time, such institutions can also begin to conduct research across disciplines and introduce graduate programmes, and may thereby aim towards becoming either Type II or Type III Institutions. All of this is fine in theory but how the system of higher education will be supported for integrating this domain is not addressed specifically as the situation stands with regard to the existing gaps in the case of even private universities[[12]](#footnote-13). The committee is full of such deceptive, false and illogical recommendations.

At the level of infrastructure and funding arrangements and at the level of attracting and recruiting competent teachers for this domain, the policy proposes to treat both public and private universities on par. The policy is going to enable the philanthropic institutions to channelize funds to all types of institutions. Even publicly funded institutions have been asked to rely on private funding for the objectives such as preparing the teachers for doctoral research, infrastructure establishment, faculty recruitment and development in technical and other area of tertiary education, teacher professional development and organizational funding in school education, research and innovation, and so on. The policy proposes that business and industrial corporations and religious institutions will be encouraged to contribute and appropriate pathways will be created to enable this kind of transition in the system of education. A new class of grant-making private institutions as part of the enabling mechanism will be established to support the existing institutions and to contribute to the establishment of new institutions.

The AIPSN believes that the policy recommendations on private financing will end up creating new silos, disintegrating and damaging the system in practice rather than constructing anything better than what even exists with the proposals to build a three-tier system of degree giving higher education institutions. Private funding will depend on the system of ranking to decide whom to fund from within the system of higher education institutions and schools. Therefore, not only the elite institutions but even the mass-serving institutions need to integrate the missions of teaching, research and outreach. This is absolutely the requirement if all the educational institutions need to mobilize faculty, funds, admissions and placement for students from all the different types of private sources of funding.

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

**Contours of private financing**

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

Notwithstanding all the lip service that the committee pays to the avowed public purposes in letter and spirit, the proposed policy has not been able to mobilize regular block intra-mural funding for post graduate education and research activity. Project funding rather than regular intra-mural funding for research will be the new normal. Unstable funding, project proposal writing will be the consequences of recommended financing proposals. The policy is implicitly far more devoted to figuring out how the proposals of increased private investment would be implemented.

The substantive proposal is that all the higher educational institutions (HEIs) would have to prepare institutional development plans. They will have to set up the development offices to mobilize philanthropic funding to meet their developmental needs. The proposed policy calls for the rejuvenation, active promotion and support through private philanthropic activity in the educational sector. The policy speaks of uniform regulatory and assessment parameters for public-funded and private Higher Educational Institutions (HEIs), private-funding of institutional infrastructure through corporate philanthropy, CSR and capital markets, greater contingency in teaching appointments and career progression leading to more professional insecurity and inequity-all of these are coevolved mechanisms to reduce the reliance on publicly funded higher education for the mass of students and limit them to the Tier III higher education institutions.

**Lacunae of vocational education**

There are serious lacunae in many of the specific policy suggestions made in NEP2019 regarding vocational education that would run counter to the stated objectives of the committee report in respect of the design, duration, curriculum and institutional locus of courses; entry and exit points in higher education institutions (HEI) and corresponding qualifications at entry and exit; correlation with demands for skills and knowledge in industry and professions linked to job mobility, skill upgradation and facilitation of life-long education (LLE); institutional location of imparting practical training/skills in HEI, polytechnics, training institutes etc., towards effective vocational education and the role envisaged for high schools/secondary education in vocational education. The policy suffers from considerable confusion regarding the loci of setting of curricula for vocational education courses, linking of vocational education with industrial needs and of vocational education with the skills component, and institutional responsibility for all these tasks.

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

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

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

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

**Health education**

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

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

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

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

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

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

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

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

Instead of the mandatory universal exit examination, students could score themselves on national accreditation examination, on completion of their internship, so that employers (including government) can use this is as one of the many considerations they look at for providing employment. This would provide the freedom needed for affirmative action to find the appropriate provider for many geographical and social contexts of vulnerability and special needs.

With respect to the nursing cadre also these concerns on common national entrance and exit examinations apply- but this time supplying a much larger base for the coaching industry. A further concern is the damage that plans to phase out GNM like courses and have only BSc nursing will do to the availability of nurses in human resource deficit states and regions. There are also major syllabus revisions required. And then there is a proposal for periodic renewal of license through some testing procedure- while there is no such clause for any other category of service providers. The entire section on nursing education should be re-examined in consultation with key stakeholders, the ministry of health and family welfare, the nursing council of India and in the states, associations of nurses, and others engaged with improvement of nursing and nurse education.

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

**Uncertain project funding for research**

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

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

**NRF without planning a recipe for duplication**

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

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

**Pathways to political capture of education**

The AIPSN believes that like anyone else the “volunteers” of RSS are also entitled to receive state and corporate funding through the new architecture of management, funding and governance. Since these volunteers would be openly entering into the school system through the school complex management committees and tutor volunteers and into the system of higher education institutions through the “committed and competent” board of governors and the Vice Chancellors who will be designated as the Chief Executives and will have power to close, reconstitute, redefine membership and change structures currently existing within the higher education institutions, our concern is that where are the constitutional safeguards to ensure that the education system is open to the people who have a different worldview and do not accept the Hindutava view of the Indian nation. The policy will end up helping the governments to subvert critical thinking. Rather than revamping the higher education system the policy will end up promoting degree granting educational factories producing substandard conservative, conforming and compliant young outturns, drop-outs and wasted youth.

**Political capture of definition of merit**

The AIPSN believes that the “educated” elites would end up also legitimizing the non-merit as merit produced in a 21st century system. The mass of young minds would be made to act like robots and pracharaks doing chest thumping and blaming the imagined enemies of the nation without demanding minimum human intelligence and showing compassion for the compatriots and from cohorts the responsibility for their counter-productive social actions. As the policy allows extreme centralization of the system of governance and funding under the Prime Minister, this kind of political capture can easily happen and should be definitely avoided. The system of education should remain open to all sorts of ideas; heavy promotion of critical thinking is the way forward. The proposed architecture of management, funding and governance can end up facilitating the closed minds to be aggressive with the idea of “heavy promotion” of socially regressive ideas in respect of the role of education on the caste, gender, religion, language and Indian history. The proposed timeline of implementation of substantive proposals of the committee namely the immediate and rapid restructuring of higher education and the updating of National Curriculum Framework by 2020 implicitly reveal the implicit thinking.

**Political capture of traditions, ethos and values**

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

The policy seeks to create a new system aligned with the aspirational goals of 21st century education while remaining consistent with its own narrow and sectarian interpretation of what are India’s traditional value systems (p.24). It is clear that the committee has anticipated the aversion of current political dispensation to the values of reservation, secularism and participatory democracy. The policy is silent on the implementation of reservation in faculty recruitment and student admissions in the case of existing publicly funded institutions. It is a monologue undertaken by the committee on education on behalf of the government in power. The committee is explicit that the government should not burden the private institutions with the implementation of provision of reservation in faculty recruitment and admission of students (p.334). The policy proposes to continue with the unjust, unscientifically designed schemes of merit testing, for example NEET, GATE and so on. The existing testing systems practice exclusion of the disadvantaged sections. The policy has missed a major opportunity to make the changes in testing schemes.

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

The AIPSN believes that the need to question the regressive parts of Indian traditions, ethos and values did not cross the mind of committee members. It is our understanding that the contentions in place over the Indian traditions must be taught to students with an open mind. The committee does not even ask what are those Indian traditions, ethos and values that the teachers should not learn and teach in the schools and colleges. The policy proposes a centrally run programme of capacity building to be launched by the MHRD for its immediate implementation without caring for the constitutional fact that education is a state subject. Public funds have been allocated for this step from the central government. The government has been asked to allocate funds for the teaching of Indian traditions, ethos and values though a crash course to be run by the central government before 2020.

**A recipe for structural, political and ideological retrogression**

What can be done to bring an end to caste, creed and gender discrimination through education is not on the agenda of the committee and the committee has rejected the idea of common neighborhood schools and replaced with school complexes and special educational zones. Notwithstanding the above recommendation the policy also suggests to the government to ensure that school and college teachers should also learn the latest advances in pedagogy and build their own competencies. The priority has gone to the pathways that can perpetuate a false pride in the past and actively contribute to the destruction of the foundations of the system of education and create new economic and social divides. The policy will make the young ones accept the irrationality of caste, creed and gender discrimination as Indian traditions.

The AIPSN believes that the proposed policy should specify the safeguards against such a dangerous scenario in order to prevent a harmful takeover of the Indian system of education in making. It is apparent that the proposed policy is going to end up wasting one more important opportunity to fix the crisis of education system. The policy will pave the way for a completely commoditized, privatized, corporatized and socially regressive system of educational institutions. The policy will continue to cause the exclusion of national languages, caste and creed (Minorities) and other underrepresented groups such as scheduled tribes and ethnic groups living in North, East, South and West. The policy will provide support to the Hindutava guided majoritarianism nationalistic tendencies.

The AIPSN believes that the policy will not improve the Indian system of school, vocational and technical and higher education and research but make it substandard, costly and inaccessible for the disadvantaged sections. The proposed policy will have grave consequences for the practice of teaching and learning. The policy enables structurally the system of education to institutionalize new social divides and restrict social mobility of the educationally and socially backward classes through the creation of new silos. The policy will allow the executive to damage and disrupt the system of school and higher education. The policy will end up making the problem of wastage of education even more acute. The policy will enable the substandard higher education institutions to proliferate and survive with the full sanction of the state. Given the track record of the government in power is disappointing, it is also clear that public funds will still continue to flow into private institutes of dubious record.

**Crisis will deepen**

The committee has suggested a totally unrealistic timeframe for the implementation of recommendations on the higher education. The policy will further aggravate the crisis of education system. We demand from the government to translate the document in all the national languages and consider the feedback from all the sections with an open mind. India would heavily suffer by implementing the recommendations of NEP 2019. India will experience several types of systemic inabilities and falter in a big way with the emerging challenges of development and nation building. The Committee report should be debated in all the state legislatures. The people of India should be allowed to debate in the public without fear of reprisals. The far-reaching recommendations that the Committee has made with regard to the Indian system of education need a social scientific analysis and involvement of educationists and researchers of repute and proven standing and the involvement of lay citizens. The policy is deciding their fate and the Indian future.

**Demands**

Draft NEP 2019 should be redrafted after wide ranging consultations in line with constitutional provisions and values for which the movements of teachers, students and others have fought consistently to reiterate commitment to basic free and compulsory education through a system of neighborhood school and college programme to ensure all girls and historically deprived sections get access to quality public education.The policy needs to incorporate the constitutional safeguards against extreme centralization. The policy should not shy away from implementing the time-tested mechanisms of participatory democracy.

**School Education**

Neighborhood creche for 0-3 absorbing anganwadi workers as regular employees as feeders into neighborhood early childhood education 3 to 6 schools;

Neighborhood common school based free and compulsory quality public education for 7 to 18 years;

Provide freshly cooked breakfast and lunch to all children in all schools using common kitchen and dining arrangements and with regularized mid-day meal workers recruited locally as part of the national school nutrition service and ban all packaged and pre-cooked food;

Ensure all the employees of organizations receiving public aid irrespective of their affiliations (public servants, government offices, institutions and professions, public and private organizations in the business sector, non-governmental organizations, public representatives, etc., send their children to neighborhood common schools;

National Tutor programme to be replaced by full time state level teacher recruitment to serve in neighborhood common schools;

Common norms for all schools whether aided or otherwise;

Expand the formal schooling system on the basis of the guidelines of the RTE Act and do not dilute the Act;

Elected school management committees with members from all the diverse sections including disadvantaged groups;

Education for advancement of secular Indian traditions, transformative and cosmopolitan human values integrated from around the world with the emphasis on incorporation of respect for linguistic ethnic and religious minorities;

No change in NCF 2005 without consulting the school teachers and parent associations;

Create a national education fund with a view to pool the contributions from philanthropic and corporate sources, tax corporate profits and make allocations and do not ask individual organization to mobilize funds separately on their own on the basis of projects to be submitted to the sources, be they are for profit or not for profit;

Education in mother tongue at primary education level compulsory learning of English at elementary level and modern Indian languages for all implement the three-language formula of 1968 with the option of the choice of third language to be left to the student.

Emphasize on basic education in mother tongue; implement the provision of deprivation points to give preference to girls in schools and young women in higher education;

National translation service for exchange of text books and resource materials between different state school boards and CBSE;

National Library Network with a target of library in each village, school and college in all parts of the country with the Central and State funds allocated for the programme;

Physical education needs to be strengthened with sports and games.

**Higher education**

Ensure all higher education institutions create facilities and resources for the integration of research, teaching and outreach.

Do not widen the gap and strengthen linkages between state and central universities.

Scrap all the natonal entrance examinatipns for the next level of higher studies at the state level. Give autonomy to the states. Continue with national testing in the case of only central universities, Institutes of National Importance, world-class institutions, IITs, IISERs and other similar institutions.

Take steps to democratize all existing systems of regulation and funding through provision for elected representation and through ensuring adequate women’s representation in all committees for governing higher education.

Provide low cost and affordable higher education as a right to all without diluting its scope and content

Work within the framework of the Central Universities Acts and the system of Reservation. All relevant Acts should be strengthened to ensure the policy of reservation is even followed by private players and their fee structure is regulated through legislation

Bring all the existing assets and facilities of private higher education institutions under public control and link them with the existing university system, rather than disinvesting in the university system and separating regulation from funding

Equal opportunity to women in technical, professional, higher and vocation education

Instead of opening Indic studies, HEIs can provide the space for linguistics studies and each State can be encouraged to have Central Institute of Indian languages.

1. The Finance Minister claimed that the new NEP will “transform India’s higher education system to one of the global best education systems.” The Minister even credited the Modi government for the recent inclusion of (IIT Bombay, IIT Delhi and IISc) in QS World University Rankings. The Minister announced that an amount of Rs 400 crore will be provided for “World Class Institutions”, for 2019-20- Rs 128.90 crore more in the revised budget 2018-19. The Minister announced the formation of National Research Foundation (NRF) and allocated Rs. 100 crores for the NRF from the budget of FY 2019-20. The Minister claimed that HEIs are becoming ‘Centers of Innovation’ and referred to SWAYAM (Study Webs of Active –Learning for Young Aspiring Minds), Global Initiative of Academic Networks (GIAN) and the IMPRINT (Impacting Research Innovation and Technology) scheme. While SWAYAM offers **open online courses** from Class IX to post-graduation free of cost, GIAN and IMPRINT focus on institutes like IITs and IISc, and announced how ‘new-age skills’ like Artificial Intelligence (AI), Internet of Things (IoT), Big Data, 3D Printing, Virtual Reality and Robotics, are going to creat**e more than 28 lakh jobs** in the country in the next few years. Currently, B Tech courses in AI are being offered mostly in premier institutions like IIT Hyderabad and IIIT Delhi. [↑](#footnote-ref-2)
2. Constitution is a devalued keyword in the committee report. The principle guiding the committee is the aspirational goals of 21st century education, while remaining consistent with India’s (selectively) traditions and value systems (p.24). Even while listing the constitutional values, the draft NEP 2019 drops the words socialism and secularism, and incorporates among other things the value of a “true rootedness and pride in India” (p.96). Equality is interpreted to mean inclusion and equity. [↑](#footnote-ref-3)
3. See the Chapter 23 on RashtriyaSiksha Aayog (RSA). Appointments to all statutory bodies in the higher education sector will be made by the RSA – and will, by default, await the nod of the Prime Minister. Appointees to the NHERA, HEGC, NRF, NAAC and all other standard-setting bodies will report to the RSA. They will be beholden to the Prime Minister. This means the NEP’s unashamed surrender to ruling party intervention. Higher education will have to be de-facto subservient to political interests. Autonomy has been circumscribed and reconfigured both structurally and ideologically. [↑](#footnote-ref-4)
4. See p. 316, the Chief Executive (the Vice Chancellor) that there will be no elected members to any of the bodies/structures within the higher educational institutions (HEIs), other than some bodies of students-read the student bodies inclusion as the inclusion of those who are aligned with the ruling party. [↑](#footnote-ref-5)
5. Political party capture would be also via home schools, flexible alternate models of school education and community schools, National Tutor Programme, Remedial Instruction Programme Volunteers, philanthropic funding, market (read corporate interests) [↑](#footnote-ref-6)
6. Read p.241 along with Chapter 17. [↑](#footnote-ref-7)
7. The post-independent history of education was not without contradictory tendencies determining and influencing the project of national or social transformation through education. See Dinesh Abrol, 2007, 2010 and 2011 for the contentious history of higher education of post-independent India. After 1968 major struggles broke out to gain democracy in the administration of the educational institutions. These struggles were in part inspired by the student revolts for educational democracy in European continent. [↑](#footnote-ref-8)
8. The policy relies on the imagined benevolence and commitment of governments and on the growth of the economy (p. 33, DNEP and Chapter on Financing). [↑](#footnote-ref-9)
9. The DNEP’s recommendation of ‘School Rationalization’ wherein schools with less than 50 students may be merged into ‘School Complexes’ is in line with the schools closed or merged through executive orders of MHRD and NiTI Aayog. See Chapter 7, DNEP. [↑](#footnote-ref-10)
10. A multi-state study carried out by the CPRHE at NUEPA on the financing of public higher education institutions demonstrates how the sources of financing have undergone significant changes at the state level in India. The state level institutions, which account for 94 per cent of the enrolment, get meagre resources from the central government. The major share of public funding goes to central universities and institutes of national importance. Funding by the state governments is not sufficient for the sustenance of many state level institutions. The empirical evidence based on a study of different institutions indicates that student fees, income-generating activities, and self-financing courses constitute important sources of additional non-State resources in higher education. There seem to be wide variations in the capacity of institutions to mobilize resources from different internal sources. While institutions located in urban and resource-rich areas find it easier to mobilize resources, their counterparts in rural and resource-poor areas find it difficult to do so. In view of the decline in public funding and the difficulty in mobilizing resources, some of the institutions end up spending 96 percent of their recurring expenditures on salaries, leaving them with very little for the conduct of other academic activities in the universities. However, as pointed out earlier, the Central universities are less affected by the declining public funding in comparison with their counterparts supported by the state governments (CPRHE, NUEPA, 2017). [↑](#footnote-ref-11)
11. Six per cent of students who appear in these examinations or tests pass the eligibility. These institutions are more a way of excluding most of the promising ones and including a very few into the elite system of institutions. [↑](#footnote-ref-12)
12. Sangeeta Angom (2015 from NUEPA, Delhi made a study of the output of private universities and pointed out the output is still low and maximum at degree level. Further, the research factor is very low performing, and, as such, enhancing research capabilities remains a challenge for private universities. As the examination system is purely internal in private universities, the quality of their product can always be questioned. As such, the engagement of external examiners by the universities can help in standardizing and even improving the quality of examinations. The infrastructure facilities provided in the universities too vary from one another, with some of them having sufficient facilities within their huge campuses whereas others are not even having their own campus while being housed in rented premises. Most of them have given importance to professional subjects rather than traditional ones. [↑](#footnote-ref-13)