



Some Points for Discussion in the Proposal for the Draft National Education Policy, 2016

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After the feverish pace of wide scale consultations in 2015-16, late last year the process of finalising the new National Policy on Education slowed down. The Ministry for Human Resources Development announced that it would set up a Committee for drafting the policy and the report of the TSR Subramanian Committee would be treated only as an input. The official website of the Ministry neither lists the names of the new Committee members nor showcases any draft of the policy which is in the making. In this article, we shall be discussing some of the key points made in the MHRD note called *Some Inputs for Draft National Education Policy 2016* and point out certain considerations that have a bearing on the proposed provisions.

1. 'Nationally the percentage of out-of-school children aged 6-13 years has declined significantly since 2000. However, the absolute number of out-of-school children remains high. The relatively lower enrolment rates in upper primary and secondary education, as compared to primary education, are also a matter of concern. Ensuring upward transition/mobility of students from elementary to secondary to achieve universal secondary education and from secondary to higher secondary and tertiary education continues to be a challenge' (p. 7).

Discussion

The articulation of the challenge as 'upward transition/mobility of students' seems to ignore the differences in the nature of exclusion for different groups of children and at different levels of education (Govinda and Bandyopadhyay, 2011: Zones of Exclusion). Both systemic exclusion (in terms of push factors) and different forms of disadvantages (geographic and ascriptive and non-ascriptive social categorisation) get bypassed in such a formulation. Recent studies show that while the Right of Children to Free and Compulsory Education Act, 2009 (RTE Act) has provided a binding legislative framework, education inclusion for disadvantaged children is offered on highly unequal terms (Dyer, 2013). The Equity provision in the RTE Act (clause 4), on Special provisions for children not admitted to, or who have not completed elementary education

and age appropriate enrolment through special training, needs to be specifically emphasised.

2. 'The biggest challenge facing school education relates to the unsatisfactory level of student learning. The findings of the National Achievement Surveys (NAS) covering Grades III, V, VIII and X suggest that learning levels of a significant proportion of students do not measure up to the expected learning levels. Poor quality of learning at the primary and upper primary stages affects student learning at the secondary stage. Poor quality of learning at the secondary stage spills over to the college/university years, leading to poor learning outcomes in the higher education sector.

Several factors have contributed to unsatisfactory quality of school education. Some of these include: existence of a large proportion of schools that are not compliant with the norms and standards prescribed for a school, student and teacher absenteeism, serious gaps in teacher motivation and training resulting in deficiencies relating to teacher quality and performance, slow progress in regard to use of information and communication technologies in education, sub-optimal personnel management, inadequate attention to monitoring and supervision of performance, etc. The perceived failure of the schools in the government system to provide education of good quality has triggered entry of a large number of private schools, many of also which lack required infrastructure, learning environment and competent teachers' (p. 8)

Discussion

The understanding of quality of education seems to be very limiting and focuses primarily on learning outcomes. Scholars have emphasised how 'quality' is inadequately addressed even in the RTE Act, with an understanding of quality based only on school-input norms, inadequate inter-parameter linkages in current provision of quality, inadequacy of provisions to represent desired parameters. However, this is not necessarily addressed through a focus only on learning outcomes. What is required is a multidimensional framework for 'quality of

education’ drawing on an analysis of i) multiple but comparable interpretations of quality across different providers (related to the issue of quality differences between government and private providers) and access groups (related to the issue of different aspirations and pedagogic contexts for disadvantaged groups); and ii) interconnectedness between levels and institutions of the system as required to improve the education quality (including enhanced learning outcomes) (c.f. Mehendale, 2014).

The overwhelming focus on learning outcomes is visible even in curriculum and assessment related commendations which suggests that ‘The curricula should provide opportunities for students to achieve excellence in learning outcomes that are comparable to student learning outcomes in high-performing international education systems’ (p. 21).

The proposal to amend the RTE Act in terms of allowing dilution of infrastructure norms and instead incorporating learning outcomes is problematic. First, the conceptualisation of learning outcome as academic competency goes against the larger aims of curriculum provided under Section 29 of the RTE Act, which state that education is for all- round development of children and meant for helping them realise their full potential. Second, incorporating learning outcomes into the

legislation is risky because failure to comply would have legal consequences. The policy proposals talk about linking the failure to achieve learning outcomes with teacher’s performance and holding the teachers accountable. Students’ inability to produce learning outcomes is a result of complex factors and it would be inappropriate to place the entire onus on the teachers.

3. Equity concerns (p. 10-11) and ‘The issue of extension of Clause 12 (1) (c) of the RTE Act to government-aided minority institutions (religious and linguistic) will be examined in view of larger national commitments towards the economically weaker sections’ (p. 20).

‘Within the parameters prescribed by the RTE Act, States will have the flexibility to design and plan for the infrastructure keeping in view the local conditions. Local norms, appropriate for local conditions, will be evolved, if necessary through amendment in RTE Act, for ‘alternate schools’ which offer educational interventions for specific categories of very deprived and migrating children, and those living in difficult circumstances’ (p. 19).

‘Open schooling facilities will be expanded to enable dropouts and working children to pursue education without attending full time formal schools’ (p. 20).

Provisions of the Act	Nature of the Mandate	Main concept	Subsidiary concept
4	Special provisions for children not admitted to, or who have not completed elementary education Age appropriate enrolment through special training	Equity (in terms of focus on out of school children (mainly from marginalized groups)	Quality (in terms of the nature-content and mode-of special training)
8 (c) 9 (c) 9 (k)	Prevention of discrimination against children from weaker sections and disadvantaged groups Ensure admission of children of migrant families	Equity	Accountability
12 (1) (c)	25 % provision for children from weaker sections and disadvantaged groups in private schools	Equity	Regulation
12 (2)	Government reimbursement of expenditure to schools for 25 % provision	Equity	Regulation

Discussion

There are a number of provisions of the RTE Act that address equity concerns. The table below summarises this:

While the idea of extension of Clause 12 (1) (c) of RTE Act to government-aided minority institutions (religious and linguistic) is a welcome move, the NEP should also emphasise the existing provisions of equity in the RTE in terms of appropriate measures for:

- a. integration of marginalised groups (especially disadvantaged groups) into mainstream schooling
- b. addressing in-school discrimination in all types of schools;
- c. reinforcing its own commitment by ensuring adequate and timely funding for 12 (1) c (in terms of reimbursements to private schools for 25% provision);
- d. accountability and regulation for adherence to the specific provisions in both government and private schools.

The case for 'alternate schools' for very deprived and migrant children needs to be reviewed in terms of the RTE provisions on standards for physical inputs and norms and standards on school infrastructure. 'Alternate schools' should not become a mechanism for providing differentiated (low-quality) education for deprived and migrant children.

The same is applicable for the point on 'open schooling facilities for dropouts and working children'.

4. Governance and management (p. 12) - 'The governance and management of education system and institutions, especially at the tertiary education stage, has assumed complexity with the advent of a multiplicity of providers, programmes and modes of financing...

Commercialisation is rampant both in school and higher education sub-sectors as reflected in the charges levied for admissions in private educational institutions. The proliferation of sub-standard educational institutions has contributed to the diminished credibility of the education system.'

Discussion

The first observation is true even for school education. Private unaided schools now 'span a vast array of operations with varying fee structures, from low-fee to elite, high-fee schools' and 'may be run by voluntary organisations, missionaries, philanthropic bodies, or individual owners as business enterprises' (Srivastava, Noronha and Fennell, 2013: 4).

In addition, there are alternative schools, progressive schools and schools run by charitable trusts, new-age 'edupreneurs', and various forms of corporate bodies which run school-chains or school franchisees. There has also been a significant expansion in education service providers. As one study notes, such service providers 'have become an increasingly important part of the Indian education ecosystem in the recent years' offering 'a range of services including teacher and management trainings/workshops, curriculum management, and, teaching activities and methodologies' (Garg, 2011: 35). Finally, both funding for and delivery of different curricular and school-related products and services now occur through complex institutional systems that include social-impact investment via venture capital firms focused on education markets, public-private partnerships of multiple types, and informal/shadow institutional frameworks that co-exist with the formal institutional structures of schools.

There is, therefore, a need for emphasising an adequate and effective regulatory environment for the above. This is a sorely neglected area. The Governance and Management section also does not emphasise the harmonisation of all programmes and schemes (including the SSA) with the RTE Act; such a mandate has been specified in the revised framework for implementation of the SSA (SSA, 2011; see, especially Chapter 7: Management and Monitoring).

5. 'Expanding early childhood education services to ensure that all pre-school age children aged 4-5 years attain the learning and developmental readiness required for smooth transition to primary education, with particular attention to children belonging to disadvantaged population groups' (p. 15).

Discussion

It is good to see the policy proposals laying a lot of emphasis on education of young children, a provision which was not included under Article 21A. While the policy gives a lot of emphasis on early childhood education, there are a few problems with the proposal. Firstly, it covers ages four to five years which is not aligned with the age of children joining Grade 1 (six years). It has dropped the care dimension of early childhood care and education. Instead of allocating resources to fund a dedicated teacher, it has only put the burden of providing ECE on the anganwadi worker. While on the one hand the provision on ECE is committed to accessibility, inclusiveness, responsiveness to diverse needs, it is negated on the other hand by a commitment to provide for ECE on a targeted basis.

6. 'The National Education Policy (NEP), 2016 envisions a credible and high-performing education system capable of ensuring inclusive quality education and lifelong learning opportunities for all and producing students/ graduates equipped with the knowledge, skills, attitudes and values that are required to lead a productive life, participate in the country's development process, respond to the requirements of the fast-changing, ever-globalising, knowledge-based economy and society' (p. 14).

Discussion

The vision is worded as an all-encompassing one, containing all the right sounding key words. It echoes the international commitments we have made under the Agenda 2030 and Sustainable Development Goals. However, there are some inherent tensions within these and it is unclear how these will be resolved. For instance, the idea of inclusive quality education could get affected if the vision of getting integrated into the global economy is extended to the idea of merit which conflicts with the idea of social justice and equity. This vision needs to be specifically operationalised through the policy provisions that follow so as to facilitate their realisation.

7. 'Each State will undertake a detailed exercise of school mapping to identify schools with low enrolment and inadequate infrastructure. Wherever possible, efforts will be made to convert existing non-viable schools into composite schools for optimum utilization of human, physical and infrastructural resources, better academic performance and cost effective management. When schools are merged they could be located in a single campus. In consultation with the states, common guidelines for merger and consolidation would be evolved, without diluting the provisions of the RTE Act. The consolidation will enable the country to achieve one class – one teacher norm in a foreseeable future' (p. 20).

Discussion

The point to be noted here is 'without diluting the provisions of the RTE Act'. In terms of current efforts visible to rationalise school and teacher resources, this is hampering RTE norms. For example, smaller rural/tribal habitations with few school-going children are suffering because local schools have been merged with schools serving larger communities at a distance. Similarly, the RTE norm is only a suggested minimum. State efforts seem to be geared towards meeting RTE norms as the 'prescribed maximum', especially in terms of teacher recruitment and deployment (with aggregated average PTRs becoming the benchmark of having complied with RTE norms).

8. 'The State will endeavour to extend RTE up to an appropriate age so as to cover secondary level education' (p. 20).

Discussion

While this is a welcome move, the proposed extension should be to cover both pre-school education and secondary level education and should be mandated in the form of a revision of the RTE to make this legally binding (and not only an endeavour).

9. Teacher Development and Management (p. 28-30).

Discussion

Overall, the suggestions seem to be positive. However, the policy should explicitly make note of current contradictions and seek to address it. For example, there is the case of regulation on teacher qualifications. With the intention of preserving quality of education and protecting interests of students, the Government has empowered the National Council for Teacher Education (NCTE) to prescribe minimum qualification norms for persons to be eligible for appointment as teachers from grades 1-8. The notification of these norms is done in order to ensure that a minimum quality of teachers and teaching standards are mandatorily adhered to. The NCTE regulates teacher qualification norms for both private as well as government schools. However, when examining 'regulation inside government' of teacher qualification norms, a different picture emerges. The RTE Act permits state governments to seek exemption from the provision of hiring qualified teachers because of absence of facilities for teacher training in their states. This one-time exemption allows the states to relax teacher qualifications prescribed by the NCTE norms for not more than five years. Although this extension period has ended for most states that enjoyed this relaxation, the teacher qualification norms are not being adhered to. For example, concerns of the state governments having poor teacher educational facilities is accommodated without any sanctions and so are their decisions to appoint unqualified teachers. Thus, 'regulation inside government' remains a challenge for the NCTE which is unable to regulate the state government, thereby diluting the larger public aims of education that it intends to uphold.

10. 'Contractual teachers will be phased out gradually by absorbing the eligible teachers against sanctioned positions' (p. 29).

Discussion

In several states appointment of contractual teachers has been challenged by teachers' unions on the principle of equal pay for equal work. Govinda and Josephine (2004) discuss how holding contractual positions increases dissatisfaction among teachers, which could have adverse implications on their work. By committing to phase out the contractual appointments, the central

government has made a positive prescription in a matter which has been typically determined by the state governments.

11. School Assessment and Governance (p. 32-33)

Discussion

The emphasis on bottom-up accountability mechanisms through community participation and parental involvement is laudable. However, current research shows that this should go hand-in-hand with strengthening the capacity of the existing institutional system for better top-down accountability. This is aligned with findings of studies that show Social Audits (and other bottom-up accountability mechanisms) not being effective to the extent desired when not matched with a responsive bureaucracy that is willing to hold its institutional system accountable. Similarly, there is need to emphasise internal mechanisms of timely flow of funds to local bodies (see, policy briefs of Accountability Initiative on this).

In terms of the intent that the 'States will endeavour to increase allocations for SMC training and ensure that schools receive their grants in time, to effectively implement School Development Plans (SDPs). SDPs will be integrated into the budgeting and planning process at the district level' (p. 33): This requires a fundamental re-orientation of how the Annual Work Plan and Budget (AWP&B) exercise for SSA is carried out, which is more a top-down template-driven process with centralised norms that in reality do not provide space for local-specific bottom-up planning.

12. 'The government will take steps for reaching the long pending goal of raising the investment in education sector to at least 6% of GDP as a priority' (p. 41).

Discussion

This has been a long standing requirement and a commitment since the Kothari Commission recommendation (1964-66) and one that was recognised in all the National Education Policy provisions (1968, 1986, 1992). It is good to note the use of the phrase "at least" and 'priority'.

If this note on draft inputs for the new National Policy on Education prepared by the MHRD based on the TSR Subramanian committee report is

to serve as an 'input' to the policy which will be drafted soon, it would be important to review the main proposals given therein with regard to how they contribute to the key concerns of education in contemporary times, namely, accessibility, equity, quality, affordability and accountability.

Note

All page numbers, unless otherwise referenced, refer to the document *Some Inputs for Draft National Education Policy 2016*.

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