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Ministry of Human Resource Development,
Government of India,
New Delhi

Aug 9, 2016

Subject: Inputs for Draft National Education Policy, 2016

Sir,

Common Cause has been much concerned about the deteriorating quality of education and the abysmal learning outcomes, especially in the government school system. It is unfortunate that even after 68 years of independence, our country cannot put every child in school, leave alone guarantee quality education for all children.

Common Cause has been engaging with a large number of like-minded partners to make the RTE Act a reality. Enclosed are our comments on the Draft National Education Policy, 2016, pursuant to the public notice issued by the Ministry of Human Resource Development. The comments/ suggestions are mainly about primary and secondary education and are divided in two sections, general and specific. Hope you will find them useful.

Yours faithfully,

Vipul Mudgal,

Director and Chief Executive,

Common Cause

General Comments and Suggestions

1. The draft National Education Policy (NEP) document should clearly spell out the vision and the objectives of the proposed new education policy.
2. The vision of the NEP should be drawn from the core values of the Constitution of India, ideals of social justice and the international standards and commitments. It should emphasize upon the holistic and healthy development of children under the conditions of freedom and dignity without discrimination or exclusion.
3. The entire NEP document should be in public domain instead of a truncated version i.e. “Some Inputs for Draft National Education Policy, 2016”. The Ministry should also place in public domain the report of T.S.R Subramaniam Committee as well as other recent reports on revamping of the education system.
4. Early childhood is a crucial stage with rapid growth and development of a child’s brain. The NEP document should provide well defined opportunities for promoting optimal development and active learning capacity of all children below 6 years of age. It should include rights of children from 3 -18 years.
5. In order to impart quality education and improve learning outcomes in the government school system, the Governments must learn from their own home-grown best practices and success stories such as Kendriya Vidyalayas and Navodaya Vidyalayas. The KVs and NVs should be treated as basic standard of all schools under RTE.
6. The medium of instruction for lower primary education should be the mother tongue. A child tutored in her vernacular language is more likely to acquire language proficiency, both in mother tongue and second language as compared to a child schooled in the second language.

Specific Comments

Chapter II

Access and Participation

1. The NEP should go beyond the Right to Education Act, 2009 and include children and adolescents between 3 -18 years from the present 6-14 category. The rationale is that early childhood education is critical to an individual’s educational outcomes. In order to develop a truly holistic education system,

focused on quality and improving educational outcomes, it is of utmost importance to increase access to formal pre-primary education, and therefore early childhood education should be integrated with the formal schooling system.

2. Ensuring access to education for each and every child, including street children and those engaged in begging or voluntary or forced labour.
3. Getting admission in government schools is also a painstaking process. The RTE Act prohibits delay/denial of admission for failing to produce transfer/ migration certificates. However, it is seen that the government schools are still rejecting students in the absence of TCs. The NEP should build accountability mechanisms and penal provisions in the event of such violation of the Act.
4. RTE mandates 8 years of compulsory schooling for children from 6-14 years of age but drop-out rates continue to remain high. However, as per official figures, the drop-out rate, i.e. proportion of children from this target group who do not complete eight years of compulsory schooling, is about 45 percent nationally. The high enrolment rate in primary school is accompanied by a high drop-out rate in secondary schools. This represents a huge wastage of human resources and signifies deep lacunae in education delivery.

The Karnataka High Court has taken a pioneering step in this direction by initiating a *suo motu* PIL questioning the Karnataka government on the huge numbers of out-of-school children in the State despite the implementation of the RTE Act. This initiative was triggered by a report in the Bengaluru edition of 'The Hindu' of April 30, 2013, according to which more than 51,000 children were out of school in the State. This *suo motu* PIL resulted in 'injecting urgency' into the bureaucracy on this matter. The key provisions of the United Nations Convention on Rights of the Child (UNCRC), namely Articles 9(1), 18(2), 19, 28 and 32, and that of Articles 41 and 46 of our Constitution, have now been written into the RTE Rules of Karnataka in the form of Rule 6, a preventive protocol, as a means of enrolling and retaining every child in school and actualising the Fundamental Right to Education promised by Article 21A. This has succeeded in arresting the problem of drop-outs to a large extent and can serve as a model for the entire country to universalise elementary education in the NEP.

5. Introduction of civic and value education, social harmony classes and their inclusion in all grades upto the Higher Secondary level. Moral values like discipline, respect for environment, regard for teachers and elders, sensitivity towards the less fortunate, humanitarianism, purpose and importance of cleanliness in our daily lives, fundamental duties, etc should be inculcated through theory and practice.

Quality Issues

The Annual State of Education Reports and other independent assessments reveal that the learning outcomes across the country, especially in the government school system, have actually declined over the period of RTE, even as the number of in school children has risen.

It is submitted that the Ministry may form a committee to compare, learn and adapt to our context effective learning strategies not only from other geographies and situations, but also from the successful educational models adopted in other states such as, though not limited to, the Gunotsav model in Gujarat, Gunvatta model in Bihar and the 'non traditional' but extremely effective schools run by the Bodh Shiksha Samiti in the slums of Jaipur or Pratichi Trust in West Bengal.

Chapter IV

Learning Outcomes in School Education

1. The no-detention policy until Class IX and the Continuous Comprehensive Evaluation (CCE) system has led to a progressive 'dumbing down' of education and weak fundamentals of students. Also schools have been known to inflate the cumulative grade point average (CGPA) to enhance their prestige and popularity.

The entire examination system, therefore, needs to be overhauled yet again, beyond mere cosmetic changes. A beginning should be made by scrapping/amending the no-detention policy provided for in the RTE Act as rightly pointed out in NEP, 2016. This can be continued until we are able to provide schools of the level of Kendriya or Navodaya Vidyalayas throughout the country.

Curriculum Renewal and Examination Reforms

1. Textbooks should be continuously updated, and the focus should be on balanced, non-partisan inclusions based on the values enshrined in the constitution of India.
2. Examination is an imperfect but essential way of checking the performance of not only the students, but also the class teachers and Principals. It should be continued until we develop and demonstrate a better system.

Teacher Development and Management

1. Formulation of assessment methodologies which requires teachers to experiment and engage skillfully with children while teaching. Scientific, pre-established criteria for measuring learning outcomes of students, based on which teachers can be incentivized or disincentivized.
2. School inspection systems need to be strengthened and include participation and involvement of community/panchayats/local bodies in evaluating schools.
3. Teachers are role models for students, but it is a grossly underpaid profession. It is imperative to incentivize the best of minds to take up teaching as a profession and need for measures/ guidelines are needed to make this profession, financially lucrative and respected.
4. Detailed procedures for recruitment of the faculty, and various learning/teaching programmes need to be spelt out in the policy document.
5. In government schools, the teachers are known to suffer from a lack of motivation. In most states the administration of school education is heavily centralized and even at the primary and middle school level, transfers are decided by the concerned Minister. The NEP should have provisions to stop such practices.

Language and Culture in Education

1. The medium of instruction for lower primary education should be the mother tongue of the child in all schools. The child learns more quickly through it than through an unfamiliar linguistic medium.

Self Development through Comprehensive Education

1. Enriching non school activities like visits to theatres, historical sites, summer camps during holidays, etc. Schools should organize trips to all kinds of temples, mosques, gurudwaras, churches, monasteries, etc to inculcate values of tolerance, multi-culturalism and appreciation of the other communities' faith and religious rituals and practices. Such provisions exist in the schools of the UK and many EU countries.
2. Opportunities should be created for student exchange programmes within India for all students in both private and government schools.

School Assessment and Governance

1. To ensure minimum quality of teaching and learning outcomes, time-bound policy guidelines required for bringing all government schools in the country at par with Kendriya Vidyalayas and Navodayas.
2. Mapping of performance annually for schools, teachers, Principals and students on defined parameters would differentiate between well-run, performing and under performing schools.
3. Schools need to be made accountable for delivering high learning outcomes. The watchdog mechanism in South Africa where an oversight committee along with organized community whistleblowers monitors the delivery outcomes could provide a template for improving the functioning of schools. One could also draw inspiration from the USA, where vigilant community organizations safeguard the rights of the underprivileged.
4. School Management Committees (SMCs) need to be strengthened and trained. The parents and guardians require skills sets and tools to evaluate the teachers and their pedagogy, taking into account that mostly wards from low income groups attend government schools.
5. Social audit of schools should be conducted and public hearings should be held in all schools at least once a year, and in the presence of education authorities, to ascertain the satisfaction level of the parents and students.