

CPI (M) response to New Education Policy 2020 (NEP)

A. Introduction

1. NEP 2020 is a vision document rather than a real policy document. Despite its impressive sugar coating, it lacks in details and a roadmap for implementation. Many specific proposals of NEP contain are impractical and would cause enormous disruption for institutions, students and teachers, and would require considerable increase in public expenditure on education which remains a distant dream. NEP talks of gradually raising public investment in education to 6% of GDP, but such promises have been around since the Kothari Commission Report 1966. Given the actual record of the present government, what is also required is a commitment to increase annual budgetary expenditure on education by the Centre. At the same time, this obvious vagueness in NEP and many other proposals, both in the text itself and reading between the lines, prompt serious concerns regarding a push towards increased centralization through a raft of Central Institutions to govern and regulate education undermining federalism, and autonomy of academic bodies, accelerated commercialization, deepening inequity in access, and RSS ideology driven imposition of a straightjacket across the nation bulldozing the diversity of the Indian reality regrettably by influencing the minds of impressionable school children. This ideological drive seeks compliance of our children by promoting irrationality, in thought and action, in place of rationality; promotion of obscurantism and unscientific thinking rather than nurturing and strengthening scientific temper amongst our children. This ideological drive seeks compliance of the younger generation, India's future, to be servile conformists.

- 1.1. Questions therefore arise about how NEP is expected to shape education in India over the second quarter of the 21st century. As discussed below, NEP will likely reduce quality of education at all levels; widen disparities in educational facilities and opportunities; reduce educational access especially for rural, poor, SC/ST and other disadvantaged sections, with no mention of reservations or other affirmative action; increase costs of education across the board; and fail to meet the aspirations of India's children and youth for all round knowledge and gainful employment in the modern, increasingly globally-integrated knowledge- and skill-intensive economy. While the education policy looks at the supply side of human resources, government needs to ensure that sufficient jobs are created in a growing and modern economy. Despite the Prime Minister's 'perplexing' rhetoric of NEP producing 'job creators' instead of 'job seekers', the tall claims of preparing our young people for the changing world and its requirements, the existing horrific reality of unemployment will end up in large scale exit both from schools and higher education with multiple formal points of departure.

B. Early Childhood Care, Development & Education (ECCE)

2. NEP Proposes to add 3 years to a child's education through ECCE for the age-group 3-6 years. As per international norms, the idea is to prepare the child for primary school through play, activities, nutrition and care so as to aid cognitive growth and learning

abilities in a safe and caring environment. This requires adequately trained persons who are given due recognition as professionals performing specialized roles in the education and child care system.

- 2.1. NEP proposes to do this both through the existing Anganwadi system as well as local primary schools. It would be preferable if Anganwadis were taken as the default focal point, since they are situated locally at village level allowing parents to conveniently drop and pick up children, and enabling the Anganwadi worker to provide at-home parental counselling. Whereas NEP states that Anganwadi workers would be given necessary professional training through virtual learning platforms along with periodic contact classes in nearby schools, no mention is made of enhanced wages, working conditions or new title matching their professional status.
- 2.2. Local panchayats and Anganwadi workers should also ensure that adequate additional facilities are created for ECCE in Anganwadis with play and activity areas, and necessary materials. Additional assistance to homes/communities in the form of sanitation, clean drinking water, food security and maternal benefits should also be ensured.

C. School Education

3. Whereas Education is in the Concurrent List, the sharply increased centralization will seriously erode federalism and the rights of States, and will leave States to merely implement centrally-imposed policies with little scope for State-level shaping of Education essential for a culturally and linguistically diverse country like India, especially in the School system. Already we are witnessing protests in different States, for example from Tamil Nadu with respect to the language policy.

3.1 Specifically, NEP calls for National Textbooks with Local Content and Flavour (Para 4.31) rather than, as is the practice in most advanced countries, formulating a national curriculum *framework*, leaving it to States to develop textbooks and other materials. This centralization exposes the educational system across the country to arbitrary and motivated actions as witnessed recently when subjects/chapters related to secularism, critical thinking and certain historical/political figures were removed from the syllabus citing the Covid19 pandemic.

4. With privatization of schools already advancing rapidly, instead of extensive strengthening and revitalization of public education, NEP opens the door for further extensive privatization, including schools run by so-called “true philanthropic institutions (8.4).” NEP also provides for “alternate models of education” (Para 3.6), creating space for Sangh Parivar or affiliated organizations. NEP allows relaxations on inputs and self-regulation to all non-governmental schools (8.5). All this will inevitably undermine the public education system. It is also noticeable that NEP completely evades, and has no discussion on, the rampant commercialization and corruption that plagues private educational institutions in India, and simply leaves it to self-regulation and the absent conscience of private institutions to rectify matters, preferring to adopt a “light but tight” (9.3h) regulatory stance.

5. NEP in effect proposes withdrawal of the State from its commitment to *provide* education to the 6-14 years age groups as a right under RTE 2009 to a more vague assurance to “ensure Universal Access to education at all levels from age 3 to 18 (3.1).” This is clear from discussions on school drop outs (3.2) where remedies such as “alternative and innovative education centres... in cooperation with civil society” for children of migrant workers and other drop-outs are suggested, rather than ensuring enrolment and retention in the public education system.
 - 5.1. Similarly, NEP proposes (3.5) that Socio-economically Disadvantaged Groups (SEDG), including disabled children, would be taught mainly through National and State Institutes of Open Schools (NIOS/SIOS), subjecting them to further discrimination and the digital divide rather than making special arrangements within the public education system.
 - 5.2. A large number of government schools, especially those in small or isolated communities, are to be shut down (Para 7) in the name of efficiency, viability and resource optimization, meaning many teachers may lose jobs and affecting access of children who would have to travel longer distances.
 - 5.3. All past Education Commissions and Policies have called for a publicly-funded Common School System based on Neighbourhood Schools. NEP 2020 seems to have now completely abandoned this basic goal, implemented by all major developing and developed countries.
6. For all the tall talk of a modernized flexible education system emphasizing learning processes and outcomes, NEP proposes common all-India exams at Grades 3, 5 and 8, besides the existing Gr.10 and 12 Board exams (4.40). An additional all-India University entrance exam will be conducted in all subjects. For this another Central body called the National Assessment Centre will be formed for Performance Assessment, Review, and Analysis of Knowledge for Holistic Development (PARAKH) (4.41). In fact, the school year is filled with semester-wise, course-wise and periodic exams, not conducted internally by schools but by centralized authorities in States or at an all-India level. The role of all-India and State Boards is thus called into question. This “Exam Raj” runs counter to the entire argument of NEP 2020, and exposes the inherent haphazard and self-contradictory thinking.
 - a) NEP makes a determined push towards Sangh Parivar’s perspective on Indian society and culture. For example, the word “secularism” does not occur even once, even though NEP speaks of promoting critical thinking, scientific temper and Constitutional values. Unspecified “Indian Knowledge Systems” would be taught (4.27), with a nod to tribal and indigenous knowledge, including through “indigenous games.” In language education in Grades 6-8 (4.16), NEP stresses the “remarkable unity of most of the major Indian languages, starting with their common... origins... from Sanskrit,” completely ignoring Dravidian, Adivasi, and other language groups in the North-East, pushing the Sangh Parivar idea of ‘One Nation, One Language.’ And on India’s classical and other Indian languages having rich literature and culture

(4.18), mention is made of Pali, Prakrit and Persian, but strangely NEP does not at all mention Urdu!

D. Teacher Education

7. The well-known shortage of qualified and trained teachers, especially in the public education system and within that in tribal and remote areas, is recognized in NEP 2020 but is not addressed adequately. Some states have many teachers who are not professionally trained as per RTE. No solution to this problem is offered, except for the impractical and unrealistic NEP concept of “school complexes” and sharing of teachers between schools (5.5). An assurance is also given to put an end to the rampant “transfer industry” of school teachers, but this will require full cooperation of the States, which have otherwise been marginalized in NEP.
8. The centralized “exam raj” in NEP is again evident here in the provision for Teacher Eligibility Tests (TET) (5.4) which are to be extended to all levels of education from foundation to secondary.
9. Most problematic is that all teachers for Grades Nursery to Grade -12 will require 4-year integrated BEd degrees with one subject specialization(15.5). Earlier, teachers for Grades 6-8 could go through a B.El Ed (Bachelor of Elementary Education) course, while those for Gr.9-10 went through the 2 year BEd and those for 11-12 were also required to have a Post-graduate qualification. This enabled addressing the specific requirements at each stage. Under NEP, Graduates with a 4-year degree could take a 1-year course, those with a 3-year BA a 2-year course, giving unnecessary weightage to earlier academic qualifications rather than full-scope training in teaching skills. Finally short-term courses of 2 weeks to 3 months could be taken by any person with or without adequate qualifications thereby creating “volunteer/ part-time/assistant teachers” undermining quality of teachers, and ample scope for commercialization.
10. The SWAYAM/DIKSHA programmes for online training of teachers are proposed to be used, supposedly purely as a convenience (15.10) which completely ignores the digital divide especially with regard to teacher-trainees from rural, tribal and remote areas, further affecting equity of access to both teachers and students.
11. With respect to SEDG and other special needs students, NEP does not adequately spell out provisions for teacher training which, in turn, will affect the concerned student groups. Special concerns are that NEP does not specify the special education teacher training in a systematic manner.

E. Vocational Education

12. Vocational Education in India has for too long been mired in antiquated ideas about what it means for young adults to acquire skills and corresponding education of relevant concepts and knowledge. This assumes even greater significance in the modern economy with major technological and institutional changes in manufacturing and services. In

India's caste- and class-ridden society stretching back thousands of years, the middle classes/upper castes received education while lower classes/castes received skills-training passed down from earlier generations. This conceptual framework persists to this day, where a virtual 'firewall' persists between the education system and the skills system, which is ill-suited to a modern industrial economy where the work force requires not only advanced skills but also corresponding levels of knowledge in related areas. It is estimated that only around 2% of the labour force in India has had any formal training whatsoever, compared to 55% in China, 80-85% in the EU and S.Korea, and over 90% in Japan. International experience, in both advanced industrial economies and 'emerging' developing economies like in South-East Asia, is that *most countries consider Vocational Education (VocEd) as part of tertiary education after school*, after either completion of a full secondary education or achievement of some minimum levels there. Till now, India has vacillated between entry-level vocational skills at the +2 stage in school, inadequate even to prevent drop-outs, and a weak system of ITIs.

13. Whereas Draft NEP 2019 was moving in a better direction, although with numerous problems there too, suggesting that Vocational Education (VocEd) courses of different levels and durations would be offered in Higher Education Institutions (HEI), which would tie-up with ITIs, industry and other practical training centres, NEP has reversed direction and also not provided details unlike earlier. NEP states that VocEd would be fully "integrated with the educational offerings of all secondary schools in a phased manner (16.5) and further, that towards this end, "secondary schools will collaborate with ITIs, polytechnics, local industry etc." This is a highly retrograde step on several counts.
 - 13.1. Together with the tacit acceptance in NEP of drop-outs after Grade 10, this prevents children from obtaining a full and well-rounded secondary education, considered by most modern nations to be essential not only for a competent work force but for empowered citizens. Skills obtained here can only be low- and entry-level, inadequate for real-life industrial or service-sector jobs.
 - 13.2. Students from Gr.9 onwards should indeed obtain exposure and foundation-level skills in different modern trades, crafts and fields, but these are only introductory, enabling students to explore various options. However, professional job-oriented skills and commensurate tertiary education can only be obtained after school.
 - 13.3. This schema also hugely burdens the already stressed school system with additional responsibilities, need for new teachers with adequate skills, experience and qualifications and, above all, hugely expensive infrastructure in equipment/machinery in different trades/vocations. It is doomed to fail due both to practical unfeasibility to meet desired goals of complementing skill and knowledge.

F. Higher Education (HE)

14. Indian higher education has already gone far down the path of privatization. Around 45% of college enrolment in 2018-19 was in private unaided colleges and another 21% in private aided institutions. In professional courses, as much as 72.5% of undergraduate and around 60% of post-graduate enrolment is in private unaided institutions. Even many public institutions, especially in professional courses, have witnessed a significant increase in fees. While public institutions still dominate in University enrolment

accounting for over four-fifths of such enrolment, here too things are changing rapidly. Between 2014-15 and 2018-19, 55 per cent of the total increase in university enrolment was in private universities and another 33 per cent in public **open** universities (not regular Central and State Universities where enrolment has stagnated or declined). Private universities and other Higher Education Institutions (HEI) have mushroomed, many with poor facilities and faculty, especially in professional and technical subjects, charging unregulated high fees and various under-the-table charges, but still unable to ensure well-qualified and trained graduates. On the other hand, public universities are starved of funds for teaching, leave alone research, and being compelled to raise fees or otherwise commercialize. NEP 2020, however, not only has no solutions to this problem but, couched in lofty phrases and flowery language, proposes a model that would further accentuate privatization, commercialization, inequity and huge problems of quality.

15. The most noticeable aspect of NEP is that it simply does not recognize the deep inequity in the higher education system and lack of access for the poor, dalits, tribals, religious minorities, girl children and otherwise marginalized sections.
- 15.1. Yet the word “reservation” does not appear even once in the entire document! While analyzing the main problems in HE (9.2), NEP only mentions “limited access... in socio-economically disadvantaged areas, with few HEIs that teach in local languages,” but makes no reference to the glaring structural inequality that plagues HE in India with further damaging impacts in employment.
- 15.2. Entrance to HEI would also be based on a new entrance test by National Testing Agency (4.42), but individual HEIs are free to use these scores as they like along with any other criteria it may choose. As is well-known in all so-called “merit-based systems” to date, this would further hurt prospects of SC/ST and other disadvantaged sections and reinforce exclusionary practices.
- 15.3. Open Learning is in fact put forward as one major, if not the main, answer to the problem of equitable access and the main instrument for increasing Gross Enrolment Ratio (GER) (12.5-12.6), clearly because mainstream private HEIs would have become unaffordable, and even public HEIs would have raised fees beyond the capacity of most Indians to pay. The poor will gradually be shut out of HE and struggle with Open Learning degrees, worsening the already poor GER of Indians in HE compared to other middle-income countries.
- 15.4. The other proposal to offset socio-economic deprivation or other disabilities of the new catch-all term SEDGs is the vague prospect of free ships/scholarships with no details or assurances of government support. NEP also states that “private HEIs will be *encouraged* to offer larger numbers of free ships and scholarships,” but again without specific assurances. (12.10)
16. The big proposal of the NEP on HE is to do away with affiliated Colleges and move towards large, multi-disciplinary Universities or HEIs which would offer courses across

disciplines and categories, along with some Autonomous Colleges with powers to grant degrees.

- 16.1. Many questions have been raised about the practicality and sheer scale of this exercise which may entail closure of many affiliating colleges and creation of new large HEIs which would also be far away from students in rural and other remote areas, which would further raise costs to students and negatively impact access. NEP also makes the peculiar suggestion that specialist technical institutions, such as IITs and presumably medical colleges would also have to transform themselves in like manner! There are several other substantive problems too with this proposal.
- 16.2. These multi-disciplinary HEIs would offer 4-year undergraduate courses with entry and exit points after each year with Certificates, Diplomas, Advanced Diplomas and Degrees. The entry points may be understood as a measure to facilitate life-long learning and lateral entry after spells in industry. However, the award of Certificates and Diplomas after each year makes no sense. Undergraduate course curricula cannot be designed in such stand-alone modules. HEIs in many countries offer short-duration Certificate/Diploma courses, especially linked to vocational education, but these are purpose-designed to meet specific NSQF standards at different levels. Undergraduate Courses are completely different and cannot function this way. Such a structure would hugely diminish the pedagogic content and value of the degree.
- 16.3. NEP also proposes that, within broad nationally-set frameworks, each HEI would frame its own curricula across disciplines/courses making HE a laissez faire exercise. There is no proposal for any kind of overall State direction-setting based on identified educational needs of the country at different stages of development, or human resource requirements of the economy. All these are left to the wisdom of the individual HEIs, presumably guided by market signals.
- 16.4. Broadly the same pattern is followed for professional and technical HEIs, with the added weakness of there being no sign of any linkage with national scientific or industrial priorities in determining courses, curricula etc.
- 16.5. The Graded Autonomy extended to the Colleges empowered to grant their own degrees would, as experience with Autonomous Colleges so far has shown, only mean more privatization, higher fees and, with the freedom to offer tailor-made short-term courses, further commercialization of higher education.
17. The above proposals are linked to the regulatory structure proposed for HEIs. The broad framework in NEP is for a so-called “light and tight” framework. Supposedly this means only setting broad academic frameworks and assessment systems for outcomes, both of which would supposedly be “tightly” monitored, while leaving almost everything else such as curricula, fees, course structures, pay and working conditions of teachers etc “lightly” regulated, actually meaning unregulated and left to the HEIs. This is an open invitation to corporatization, privatization and commercialization of higher education.

- 17.1. The similarity to corporate structures is underlined by the NEP proposal that each HEI will independently form its own Board of Governors which would then take full control over all affairs of the university.
- 17.2. Individual HEIs are required to raise their own funds from “philanthropic” (read corporate) sources and are also at liberty to fix their own fee structures, supposedly within broad government guidelines, such that the “fee determining mechanism will ensure reasonable recovery of cost.” This is the same process followed in all other sectors of the economy such as electricity distribution, airlines etc where the State acts as a facilitator ensuring good returns for corporate while providing a fig leaf of “regulation.”
- 17.3. This regulatory structure implies that government only exercises “light” regulation of standards, but takes no responsibility for funding HEIs to enable them to meet such standards. There is no mention in NEP of how it proposes to fund HEIs, whether public HEIs would have any special privilege over public funds or whether the promised level playing field applies to funds as well. In the absence of adequate State funding, public HEIs would be driven towards adoption of norms of private HEIs with all its consequences for commercialization and lack of equitable access.
18. There is overpowering centralization in all measures proposed in NEP, leaving little or no role for States in higher education except simple implementation.
 - 18.1. Multiple Central Institutions are proposed to be constituted with a Higher Education Council (HECI) at the apex accompanied by NHERC for regulation, NAC for accreditation, HEGC for grants and GEC to frame outcome standards. Assessment of outcomes would also be done centrally, which may well determine ratings, accreditation and funding. While there is much talk of educators and persons of eminence being selected for these institutions, the heavy hand of the Government is obvious.
 - 18.2. A national examination for entrance to HEIs will also be conducted by a Central Agency, even though the worth of this exam is in question since HEIs are free to use results of these tests for admissions the way they see fit. The relevance of State Boards, exams conducted by them are open to question. How State Universities and other State-level HEIs are expected to function is not addressed by NEP, clearly implying that all HEIs in the country will be governed by these Central agencies operating under the Central Government.
19. Within this neo-liberal landscape of privatized and corporatized HEIs, foreign universities are proposed to be invited to operate in India. While this may be seen as a crass attempt to introduce the equivalent of “medical tourism” in higher education, it also shows some different considerations at work. It would implicitly set a standard or role model for Indian universities to follow, including corporate style of governance, market-oriented course structures, casual or contract employment of teachers, and high fees. It is

indeed ironic that “videshi” universities are invited to act as beacons for “swadeshi” India.

20. A centralized National Research Fund (NRF) is proposed to be set up which would provide funds for research to both public and private Universities. Again, as noted above, there is no sign of national scientific or industrial priorities being set in the NRF which, on the face of it, simply follows the trend of research proposals received. Secondly, there is again no sign of any movement of research priorities and agendas being shifted towards States, further widening the existing gap between the Centre and States.
21. Teachers are likely to be major victims of the NEP, not to speak of students being the guinea pigs and those from the vulnerable sections being at the worst receiving end, through the proposed corporate-style governance of HEIs (13.4-13.7). Teachers’ pay, type and tenure of employment, promotions and so on will all be decided internally decided by the BoG of the concerned HEIs with no uniform standards or norms prescribed by government. Performance assessment would be subjective and free from any oversight or regulation.
22. There is complete absence in the NEP of any structures for democratization of HEI academic or administrative management. No role is envisaged for teachers, other employees and there is no mention of any role for students in academic or administrative bodies of HEIs.