July 27, 2019

Dr. Ramesh Pokhriyal 'Nishank'
Hon'ble Minister of HRD,
Govt. of India,
New Delhi


Respected Sir,

Kindly find herewith our comments and suggestions on “Draft New Education Policy - 2019” based on the deliberations in symposiums organised by the Institute of Objective Studies at Delhi and at other regional centres attended by educationist, academics and other concerned quarters. It also contains suggestions forwarded to us by many other sources.

Hope these inputs would be given due consideration while finalising the draft of “New Education Policy - 2019”.

Institute of Objective Studies (IOS), New Delhi is an NGO in consultative status {Roster} with the Social and Economic Council of the United Nations, which is working since 1986 with the aim to undertake purposive research and studies on matters and issues of concerns for peace, development, progress and democracy leading to creation of a humane society based on egalitarianism and justice.

The IOS has completed about 410 research projects and has come out with about 400 publications focusing on various aspects of socio-economic and educational problems of Muslims and society at large. The IOS has so far organised about 1223 conferences, seminars, symposia and workshops etc., on themes relevant to social, economic and educational condition of Muslims and other marginalised communities.

With sincere regards,
Yours truly,

(Dr. M. Manzoor Alam)
Chairman

Encl.: As Above
Comments and suggestions on “Draft National Education Policy – 2019

SCHOOL EDUCATION

Right shaping of the minds from the very beginning

1. The National Education Policy should be prepared to change the educational landscape of the country to prepare the youth for meeting the future challenges as proposed, but it should be clearly for eliminating the arrogance of forced imposition of any particular faith and ideology on all Indians in any way or manner. There should be a fair cradling of the minds for aspiring peaceful co-existence of all people with their rights recognized under the Constitution of India and International instruments aimed at promoting a humane society at national and global levels. Thought and action of the citizens should be oriented through education to the advancement of the mutual respect for promotion and enjoyment of the fruits of independence as set out in the Preamble of the Constitution of India in terms of JUSTICE, social, economic and political; LIBERTY of thought, expression, belief, faith and worship; EQUALITY of status and of opportunity; and to promote among them all FRATERNITY assuring the dignity of the individual to the exclusion of none assuring unity and integrity of this great country. A highly persuasive course content and effective pedagogy must be envisioned to understand the merit of diversity and to restrain development of hate in any form among the citizens of the country. In conformity with the Fundamental Duties under the Constitution of India, the effort should be to promote harmony and the spirit of common brotherhood amongst all the people of India transcending religious, linguistic and regional or sectional diversities. The shaping of minds through education at school level and later should be made successful by developing among the students a true scientifc temper and the spirit of inquiry to earn appreciation from across the world. Inane and narrow minds with orientation of violence can only bring shame to the nation is a fact to be well noted while finalizing the National Education Policy for Democratic India with rich diversity as our proud heritage.

2. While goals of Access, Equity, Quality, Affordability and Accountability have been taken as the foundations of the National Education Policy, at the school level should be in conformity with Right to Education as a Fundamental Right. Otherwise, these goals are a shallow promise, may be to be repeated in same or different terms in One More Education Policy in 2040 or so. If quality education is not assured to all children of this country with different social, economic and regional backgrounds with proactive state measures, the potential Future Young India to be valued globally will only be a dream. This will push the country in to unforeseeable detestation to be condemned by future generations for ages
as irremediable. The expenditure on school education should, therefore, be considerably enhanced to ensure quality education to any child of this country born to any mother in any locality with any identity. This should be much more, rather two times higher than what was proposed in 1960s (6% of GDP) though that figure was also not respected till date.

3. The goal of Early Child Care and Education as ambitiously projected in the Draft Policy cannot be attained without such expenditure. In the absence of trained human resource and infrastructure this all looks only a sweet day dream.

4. Implementation of the framework of guidelines for 0-3 years, if ever appropriately laid down for every child in India, without being a massive state sponsored and effectively monitored programme of action is certainly a utopia or a misadventure to the advantage of only the already better placed groups. Anyway if some attempt is made, the medium should be the mother tongue. Multilingual skills development should not mar the possible excellent learning with mother tongue as a medium at this stage.

5. Access, equity, quality and affordability are clear invincible goals under the present funding and planning systems. Making parents accountable for 0-3 years’ education is unrealistic as a bird without wings. Making voluntary organizations work in this sector may help to certain extent. But general impression of the masses is that this is an extension of the activities for the people engaged in commercialization of education and corporatization.

6. The right to education and a plan to ensure the same to every citizen of India should be actually made available up to the 12th standard with the object of attaining balanced personality development and ability to take up professional studies and self-managed socio-economic and political activities.

1. The proposal to dilute the norms and standards (infrastructure and PTR related) defined by RTE Act, 2009 will make the space for low cost private schools which is mushrooming at rapid level across the country. The proposal for merger of schools, in the name of consolidation, where less than 50 students, goes against the very spirit and also to the litter of RTE Act. Both of the above proposals may be relooked into as their implementation may deny quality education and as well as access, to many children and may encourage privatization of school education.

2. The proposal to club XI, XII with IX, X, also requires some rethinking as an over emphasis on multidisciplinary approach may
dilute the very foundation of the specialisation at present being provided at +2 stage.

7. Reintegrating dropouts and ensuring universal access to education is a good idea. But reducing of the dropout rates by associating it with pre-schooling is only one measure. How can pre schooling be better advanced in the regions where even today pre schooling is not available?

8. Privatization of PSUs should not be followed by a total privatization of education. Government should actually establish schools in all localities with continuing education and sensitization for teachers.

9. Contribution of people like Maulana Abul Kalam Azad to the education must be highlighted in the Policy.

10. Madrasas should be proposed to initiate skill development activities at their campuses for which special funds should be provided by the government as required by its general responsibility for quality education to all.

**HIGHER EDUCATION**

1. Under the National Education Policy, the position of the Margins (SC, ST & Minority) is an issue which is of major importance for a country where education needs to take center stage. Views related to mostly marginalized and underrepresented sections of country-Muslims, Christians, Buddhist, Sikh, Parsi, etc.) also SC, ST, which collectively represent 45% of India’s population (Govt. of India 2011 Census) should be given due consideration.

2. Promotion of multiculturalism and secularism needs more support from the government at the higher education level through well planned academic activities, events and programmes.

3. Minority educational institutions should be provided adequate funds for attaining their purposes under the various provisions of the Constitution in general and Articles 29 and 30 in particular.

4. National curriculum framework should not deprive minorities of their rights to establish and administer the institutions of their choice nor should there be denial of privileges to SC and ST group.

5. University education system (grading, funding, governance and autonomy) should be liberal, academic and responsive to higher value requirements. The focus should not be to a poly technique product culture at the cost of higher adventures in knowledge creation.
6. National research fund and its approach towards quality research must ensure support to all individuals and institutions with credible research work.

7. The over centralization of education system for governance and prescribing regulatory structures including proposed Rashtriya Shiksha Aayog should be abandoned.

Teacher Education programmes

1. The proposal to allow only those institutions to run Teacher Education programmes, who are able to provide multidisciplinary courses, is likely to lead to the closure of many private institutions, which at present, are catering to 90% of the load of teacher education. Moreover, just by offering several courses, does not mean offering an integrated programme of teacher education.

The proposal of offering the same four year programme (with different specialisations) for preparing Nursery school teachers, primary teachers and secondary teachers is likely to discourage the students to opt for nursery and primary teacher education specialisations as such a suggestions does not match with the present employment policy.