

Oxfam India's submission on National Education Policy 2020

Introduction

The National Education Policy offers an unprecedented opportunity to make much needed reforms to the education system. It makes **some welcome suggestions that hold potential of positive impact on the education system in India**. Given the educational crisis caused by the COVID-19 pandemic, it acquires added urgency. **Some of the many positive measures include**

- Recognition of the continuum of learning from early childhood and secondary education
- The idea of School Complexes offers intriguing possibilities in terms of both pedagogic renewal and as an alternative of closure of schools
- Commits to a gradual enhanced in the allocation to education, especially by the centre
- Includes some positive specific suggestions, including but not limited to, introduction of school breakfast, introduction of a range of staff at the complex (social workers, counsellors, health personnel, support staff, health personnel, special educators), the focus on liberal education and the intention of removing silos of academic/non-academic, vocational/academic, the proposed secondary education examination reform, freeing teachers from non-teaching work and providing a career path and CPD for teachers. The policy's intent that private schools not be run by commercial operators or allow profit making in education is appreciated.

The actual list is much longer and this is just a partial listing. It is critical to ensure that these positives are realized. At the same time, SARTHAQ- the NEP Action plan provides a range of other action points. Almost all states are in the process of rolling out the Policy's implementation in their own state. The central government has also recently appointed a national committee to provide oversight to the policy's implementation. This is a time to share some thoughts on how the NEP's implementation could be improved.

This submission draws on SARTHAQ that was shared by the Ministry of Education in April 2021 as well as our views on the document overall. As such, it delineates seven areas where action would be desirable. At the same time, a change management process needs to be established for the departmental education machinery and the overall ecosystem to gradually transition to the new policy with due care taken to ensure that implementation is led by a bottom-up planning process and reflects the aspirations of parents, children, teachers and those closest to the ground. A cultural shift in the system to realize the vision of universal, equitable and discrimination free education for all of India's young citizens.

This is a crucial year. After a year of interrupted schooling, we are in the midst of another spike in infections from COVID-19. Given this context, we are drawing your attention to key tasks that are due this year, to ensure children's right to education is affirmed and protected. These include tasks around mainstreaming of out of school children (61-64), provisions around equity (173), regulation of private schools (210-212) and most crucially, ensuring universal, free and compulsory access to schooling (217). However, we appreciate that this is the year of task-setting. Therefore, in addition to the tasks listed above, these are our suggestions on the overall framework:

Need to further push the envelope on equity and non-discrimination

The commitment to ensuring universalization of early childhood and secondary education and the series of measures to strengthen equity including building of additional schools in disadvantaged areas, the more robust focus on children with disabilities and the introduction of Gender and Inclusion funds are appreciated.

To realize this vision, however, it is time to introduce cutting edge provisions that would change the state of play in the education sector. These could include fees waiver of girls, introduction of regular equity audits in the education system and a zero tolerance approach to instances of discrimination. Ensuring universal enrolment and retention calls for a more robust focus on ensuring the return of out of school children into formal education through provision of special training programmes and tracking attendance. A starting point as suggested by the [NHRC Advisory for Protection of Rights of Children](#) would be to revise out of school children data.

At present, girls belonging to rich families (top 20%) get on an average nine years of education, girls from poor families (bottom 20%) get none at all¹. Parental wealth or caste should not determine a child's destiny. More concrete actions are needed to address social, geographical and structural inequalities based on familial wealth. A social inclusion lens must be used for all processes, including curriculum and teacher training and social inclusion should not be seen as a standalone activity. This calls for significant enhancement of resources. We hope that the proposed 'Gender inclusion fund' would offer funds which are truly additional. Further, the policy proposes a similar inclusion funds for providing additional financing to improve outcomes of all children from SEDGs.

We are concerned that the policy focuses excessively on residential schools as a measure of increasing equity in education. These schools are poorly monitored and often function in isolation and outside the mainstream governance mechanisms. Further, expansion of residential schools should not be at the cost of expanding neighborhood schools, which should remain first choice in expanding access. Expansion of residential schools risks an increased imposition of the dominant language and customs of the state on children from marginalized communities.

Recommendations

¹ NFHS-4

1. Take steps to ensure education is gender transformational, fosters social inclusion and contributes to building an equal society. This entails including a focus on gender, social inclusion and inequality in teacher training, curriculum.
2. Initiate the Gender Inclusion Fund at the earliest and ensure that the allocations are truly additional and not replace existing work and resources on gender.
3. Take concrete steps to promote completion of the school education cycle for girls by taking cutting edge measures like making secondary education free for girls and SEDGs, radically expanding the number of government secondary schools and early childhood centres, strengthening school safety and addressing negative stereotypes in the curriculum. Girls' participation in Science and Technology and Maths education should be encouraged to break stereotypes and give them an equal start in life.
4. Institute the 'Social Inclusion Fund' to provide additional financing for improving educational outcomes of children from SEDGs, in line with the provisions of the NEP
5. Institutionalize a regular process of tracking and review of attendance and identification of children whose attendance is irregular.
6. Put in place mechanisms for accelerated learning/special training for out of school children, including those under 14 years of age, and review performance of accelerated programmes underway. This is particularly critical in the post COVID context with a specific focus on girls.
7. Apply lens of social inclusion and sensitivity to all processes, including curriculum, teacher training, recruitment and decentralized support mechanisms.
8. Set up a grievance redressal system to report discriminatory behavior, and take adequate punitive action when complaints arise. Introduce social and equity audits in the education system in an ongoing basis to ensure system remains discrimination free.
9. Enhance existing scholarship allocations and link them to the inflation index.
10. Prioritize setting up of seasonal hostels for migrant children. Strengthen quality mainstream neighborhood schools instead of expanding residential schools for SC/ST students² to avoid segregation of students based on social identity.

Address the needs of children below six and above fourteen

The NEP is pathbreaking in its focus on the educational continuum. However, some ambiguities continue to exist in the provisions as they apply to both younger and older children

With the respect to the young child, if the 3-8 has to function as a single unit, children in this age group should be physically located together and all their needs met in an integrated manner to ensure upward continuity of curriculum from preschool to early primary grades. The Preparatory Class/Balvatika must be seen only as an INTERIM measure until the foundational stage education is universalised. Furthermore, more focus is

² MoE Task 194

needed to the needs of children under 3 years. A dedicated institutional provision for under-threes must be conceptualized and detailed in the NEP Implementation Plan, within the aegis of ICDS, which is operationalized by MWCD.

There is a clear risk that existing inequities will be perpetuated due to the proposed four different pathways for delivering ECCE. For the Anganwadi worker preschool education is only one of the six services she is mandated to deliver and with shifting priorities within the ICDS, this affects the regularity and quality of the preschool education available to children. The NEP Implementation Plan must provide for a second ECCE trained AWW solely devoted to preschool education. Furthermore, a training programme of 6 months for Anganwadi workers cannot be considered equivalent to a professionally qualified ECCE educators

The nomenclature of the proposed Foundational Literacy and Numeracy Mission to address the current learning levels in view of the existing learning crisis in schools, contradicts the Policy's own recurrent holistic vision for education by limiting itself to mere literacy and numeracy. It is recommended to realign the Foundational Mission for Early Learning, Literacy and Numeracy with a focus on a holistic and updated vision for and definition of literacy and numeracy within the framework of all round development of the child. The inclusion of pre-primary stage within the mandate of this Mission will ensure continuity of the learning continuum, since many foundational competencies including the 21st century skills have their foundation in the pre-primary years. Accordingly, this new terminology should be used across the document.

Similarly, India needs more secondary schools to ensure every child has a chance to be educated in a quality public schools near their place of residence.

Recommendations

1. Extend RTE to include children under six and up to 18 years of age in its purview
2. A second ECCE trained AWW solely devoted to preschool education must be added in all Anganwadis. All preschool teachers and Anganwadi workers' capacities need to be enhanced to enable them to become professionally qualified ECCE educators
3. Put in place dedicated institutional provision for under-threes
4. Significantly enhance the government secondary and higher secondary schooling net to enable all children to complete 12 years of schooling in line with India's SDG 4 obligations.

Address risks of privatization and commercialization of education

The NEP recognizes commercialization of education as an issue (Para 8.3) while also noting that the current regulatory regime has been unsuccessful in protecting parents from exploitation by private schools. Unfortunately, while acknowledging this, it encourages states to create

guidelines to further *incentivize* private/philanthropic activity in education,³ developing PPP policies⁴ at state level and proposes a ‘light but tight regulatory’ that risks lowering the bar in terms of regulation of a sector lacking adequate safeguards to protect parents from abuse. The distinction between private vs philanthropic private schools is dangerous and should be avoided to not legitimize the notion of for-profit education. Stronger mechanisms for monitoring of private schools and grievance redress in cases of violations by private providers are urgently needed. A [study](#) by Oxfam India found that despite the visible collective hardship caused by the pandemic, 40% private schools across the country hiked their fees in direct contravention of existing government orders.

The tasks for NEP implementation proposed by the MoE, instead of regulating private involvement and addressing commercialization of education in line with the NEP’s stated objectives, goes further than even the original policy by talking about promoting ‘ease of doing business’ in education, encouraging NGOs to build schools, among other measures. This, coupled with the mention of exploring opportunities for higher cost recovery (NEP section 26.7), adds to the fear that education might no longer be a not-for-profit domain.

Care must be taken to ensure that involvement of private actors in provision of education⁵ does not create or reinforce discrimination, inequality, and segregation or undermine access to free quality public schools for everyone. Furthermore, private actors should be adequately regulated, in law and in practice and the government must ensure that they operate transparently and with adequate citizen participation.

Recommendations

1. No compromise must be made on the existing legal principle that school education is a not for profit domain.
2. The regulatory structure being setup for both private and public schools should be vested with adequate resources and human capacities to enforce the regulatory framework given the past track record of private schools failing to comply with regulatory frameworks. At the very least, current regulatory resources within the Department of education need to be transferred to the SSSA to enable it to enforce its directives.
3. Design a consultative process involving parents, civil society organisations, academicians to develop an effective grievance and response mechanism at district and state levels related to regulation and malpractices of any school imparting school education.
4. Modalities of strengthening transparency in the disclosure of information about and auditing of private schools and clear mechanisms to act on the information disclosed would need to be put in place to ensure that the principle of education remaining a not-for profit domain is not compromised.

³ Task 288

⁴ Task 292

⁵ In line with the resolution of the [UN Human Rights Council](#), the report of the [UN Special Rapporteur on the Right to Education](#) and the [Abidjan Principles](#)

5. Where fees regulatory structures already exist under pre-NEP state legislations, these need to be notified as the regulatory bodies under the Policy to avoid duplication of efforts and structures. Where these bodies do not exist, past experiences of regulation needs to be studied to ensure new architecture draws on past experience.
6. Ensure regulation of the market of private tutoring including teacher qualifications, instructional hours, fees and other provisions.

Address inbuilt risk of informalization of education

The NEP proposes creation of alternative and innovative education centres (after amending Section 2 (n) of the RTE) to ensure that children who have dropped out of schools are brought back into mainstream education. The focus on out of school children is appreciated but treating these centres as alternatives to formal schooling risks informalization of education and institutionalization of a separate type of school (possibly one that doesn't meet existing RTE norms) for the most marginalized children, particularly those belonging to Dalit, Adivasi and Muslim communities, particularly girls. In addition, it is proposed to involve civil society to run and setup these centres, effectively outsourcing the responsibility of the state to get children to school.

The proposed expansion and strengthening of the NIOS and State Open School systems would be useful but this should not be seen as an alternative to enrolling children in formal day schools. In line with provisions of the Child Labour (Prohibition and Regulation) Act, the emphasis should be on completion of universal formal education till age 14. Only post this age, can NIOS be encouraged as an alternative for students who have dropped out or have practical difficulties in attending regular day school.

Recommendations

1. There should not be retrogression of existing RTE norms in terms of quality and equity. – Add mention of 2 and 3
2. Alternative education centres should be seen as supporting transition of out of school children into formal education rather than being treated as alternatives to mainstream school; the proposal to amend Section 2(n) of the RTE should be reconsidered.
3. In line with the provisions of the Child Labour (Prohibition and Regulation) Act, emphasis should be on formal, in-person education till age 14 with the NIOS being seen as an option, only post that age.
4. Stringent child protection norms and processes should be set up prior to getting outsiders to interact with children in and outside classroom settings.

Include a more critical analysis of use of digital/IT tools

The NEP emphasizes use of technology for learning within and outside the classroom, and for teacher professional development while acknowledging that a digital divide exists and digital access is an issue for a substantial part of the population. The activities proposed suggest an excessive focus on digital learning at the individual learner instead of the classroom level. This shifts the burden and responsibility of digital access

to learning spaces, on the household rather than the state, contributing to social and economic exclusion of India's population. Only 15% of India's rural population has access to the internet⁶, while the figure is even lower for girls and children from marginalized social groups such as Dalits, Adivasis and Muslims.

Education technology has the potential to exacerbate inequities (in relation to access, capacities and costs), therefore, concrete efforts need to be taken to ensure all interventions do not inadvertently further discrimination and inequality. All materials need to be age appropriate, be in the students' mother tongue (including for tribal languages) and avoid gender and social stereotypes. Use of technology for teaching should include a two-way interface to enable interaction between teachers and students. Steps must be taken to ensure safety of children online, including protection from cyberbullying, in line with the [NHRC Advisory for Protection of Rights of Children](#).

It must be emphasised that teachers would also need extensive capacity building to use technology effectively for learning. In a [study](#) by Oxfam India, over 80% government teachers reported struggling with teaching online when digital modes were introduced during the pandemic. With the current level of teacher capacity in use of technology, it might be ineffective to use online teacher training for building capacity in learner-centric pedagogy⁷, which can be better learnt through real-life practice and observation rather than through online lessons. The NEP proposes to leverage existing platforms such as DIKSHA and SWAYAM to create virtual labs⁸. It is crucial that the content be thoroughly vetted and an extensive review of the platform's effectiveness be conducted prior to moving ahead with the proposal. Community members need to have space to participate safely, without discrimination in the analysis, design and implementation of new distance learning responses.

All distance learning materials and activities must follow the Principles for Digital Development⁹ which have been designed to help integrate best practices into technology-enabled programs and are intended to be updated and refined over time. Steps need to be taken to promote Free Open Source resources and technology for delivery of digital interventions. Focus needs to be taken to ensure data privacy, particularly to ensure that personally identifiable data pertaining to minors is not shared with other players by service providers, vendors, schools or education functionaries. The issue of data privacy has also been flagged by the [NHRC Advisory for Protection of Rights of Children](#). Clear mechanisms for regulation of private publishers and ICT providers in education (in line with the existing ICT Policy in education) must be strengthened and services kept not-for-profit.

Recommendations

⁶ National Sample Survey on Education 2017-18

⁷ Task 278

⁸ Task 280

⁹ <https://digitalprinciples.org/>

1. Pilots for use of technology should prioritize models that rely on in-school infrastructure over provision of education online which relies on household digital infrastructure.
2. Emphasis should be placed on developing content in children's mother tongues including tribal languages, for which teachers, parents and community members should be involved.
3. Steps should be taken to ensure content is inclusive, doesn't promote stereotypes and includes adequate representation of SEDGs.
4. Conduct an expert review of existing platforms such as DIKSHA and SWAYAM before expanding their scope and usage, including seeking feedback from teachers and students on the content and usability of the platforms.
5. Develop clear data privacy guidelines along with guidelines to curb cyberbullying.
6. Promote development of Free Open Source resources and technology for delivery of digital interventions and ensure services providers are not for profit.
7. Ensure data privacy, particularly to avoid personally identifiable data pertaining to minors being shared with other players by service providers, vendors, schools or education functionaries.
8. Support teachers, parents and other caregivers for digital delivery. This includes equipping them with necessary devices, ensuring availability of data and capacity to use this technology. Specific efforts would also be made to ensure safe use of technology.

Strengthen the backbone of the education system - CRCs, Complexes and the middle layer in the administration

The idea of school complexes as laid down in the NEP holds potential for systemic reform of the education system provided concrete steps are taken to ensure their adequate staffing (including a full time leader) and resourcing and adequate space is provided for citizen participation. The creation of school complexes is an opportunity to reinvigorate CRCs by reducing their non-academic work and transferring administrative responsibilities to the Complex. This separation of roles is also needed to avoid duplication of work between CRCs and the Complex. This would necessitate restructuring of existing structures and bodies including CRCs, SMCs, AWCs and PRIs but it is important that this be implemented in a phase-wise manner that is sensitive and bottom up, reflecting the aspirations and needs of parents, including local governance structures.

Care should be taken to integrate low enrolment schools with the complex rather than closing them, which would result in dropout of children from marginalised groups. School closures have also proven to be highly politically controversial in the states that introduced them into Rajasthan¹⁰,

¹⁰ <https://timesofindia.indiatimes.com/city/jaipur/Merger-of-schools-rocks-Rajasthan-assembly-again/articleshow/38504684.cms>

Odisha¹¹, Karnataka¹² and Jharkhand¹³. In Rajasthan, one of the first states to merge low-enrolment schools, enrolment reduced in two-thirds of the affected schools¹⁴. Evidence¹⁵ also shows that increased distance due to school closure has led to a rise in drop-outs, particularly among girls. Prior to any decision around the complex, its consequences on the poor, marginalized communities and girls must be taken into account. Ironically, while closure of schools have been introduced to improve quality of education, research shows no difference in learning levels in small and high enrolment schools¹⁶.

The role of other line departments with a role in delivering education (e.g. MWCD, Social Justice and Empowerment, Tribal Affairs etc.) in the delivery of this policy needs to be expanded and representation of concerned officials built in the structures proposed. At the same time, sensitization of District Magistrates, Collectors and other Administrative Services Cadre officers on the policy would be needed to enable them to better support its implementation.

Recommendations

1. The autonomy of individual member schools and AWCs should continue to be respected and creation of the complex should add and not subtract from the resources available to the individual units/schools.
2. There should be clear designation of roles and responsibilities to avoid duplication – CRCs should be vested with academic support and the Complex with administrative responsibilities.
3. Put on hold the process of closure/merger of existing low enrolment schools to allow for their integration in the complex as an alternative to closure in line with the provisions of the policy.
4. Ensure adequate staffing of the complex to undertake the new responsibilities.
5. Support children to access the complex, including provision of transport, escort etc. to travel to the complex to access the newly established resources.
6. Develop a comprehensive framework for the functioning of the SCMCs that would also respect the autonomy of the individual school forming the cluster and providing for social accountability and citizen participation in planning.

¹¹ <https://www.jagranjosh.com/news/odisha-govts-decision-to-merge-over-7000-schools-met-with-protests-156692>

¹² <https://www.newindianexpress.com/cities/bengaluru/2018/aug/17/karnataka-education-minister-n-mahesh-makes-u-turn-on-school-merger-says-budget-information-incorre-1858910.html>

¹³ <https://scroll.in/article/891982/school-mergers-jharkhands-bjp-mps-believe-the-rajasthan-model-will-not-work-in-their-state>

¹⁴ Bordoloi, M and Shukla, R. (2019). School Consolidation in Rajasthan: Implementation and Short Term Effects. New Delhi: Accountability Initiative, Centre for Policy Research.

¹⁵ Rao, S., Ganguly, S., Singh, J., & Dash, R. R. (2016). School Closures and Mergers: A Multi-state Study of Policy and its Impact on Public Education System in Telengana, Odisha and Rajasthan.

¹⁶ <https://ideas.repec.org/a/eee/injoed/v72y2020ics0738059318307909.html>

7. Strengthen grievance redress mechanisms in education to give citizens voice in decisions related to the functioning of schools- both government and private.
8. Provide for enhanced citizen and teacher participation in the review and auditing of both the functioning of the education system and also the roll out of the policy as a whole.

Put in place a change management process for managing the education governance system reform

The policy's implementation calls for a change management process across the education administration to internalize the expectations from the NEP and the changes being considered before its roll out on the ground. The transition needs to be gradual (not across the entire state at once), done in a manner that is sensitive and bottom up, reflecting the aspirations and needs of teachers and other education workers, parents, local governance structures empowered by the 73rd and 74th Amendments and other stakeholders. Similarly, a process of change management needs to be undertaken within DIETs, BRCs, and CRCs including creating new roles, revision of job descriptions and revision of roles. Some of the resulting new hiring would need to be undertaken through identification of talent within the existing pool of teachers in the system.

The implementation of the policy is predicated on availability of adequate resources. However, both the policy and the MoE roadmap does not address the question of additional funds. Accordingly, a clear roadmap would be needed to ensure allocations to education reach 6% GDP in the next five years. Care would need to be taken to ensure that spending is progressive, with greatest investment in the lower tiers of the education system. Gross inequalities in spending within the government's own education system needs to be addressed. It is difficult to explain why per child spending for elementary education in AP should be 6398 which is almost thrice that of INR 2584 that is spent in adjoining Telangana. It is even more difficult to explain why the per student expenditure of Kendriya Vidyalayas is about INR 27,000^x, which is four times the per capita education expenditure in Delhi and six times of the India figure.

The policy places considerable emphasis on strengthening information about learning. This needs to be anonymized, and no learning data of individual schools should be disclosed and simplistic comparison of data for public and private schools avoided since this risks feeding sorting effects. There is a risk of this data being used for ranking individual schools, a phenomenon highly criticised where this has been introduced like the United States¹⁷. One may consider disclosure of learning data for complexes as a whole (including both public and private schools in the catchment area) to provide an incentive for schools to cooperate. With the NEP having a comprehensive focus, it would be critical to develop more innovative metrics of quality like teacher collaboration and peer learning apart from the need to prioritize retention, enrolment and equity indicators.

¹⁷ Strauss, V. The problems with 2017 national rankings of America's high schools. *The Washington Post*. Retrieved from <https://www.washingtonpost.com/news/answer-sheet/wp/2017/05/21/the-problems-with-2017-national-rankings-of-americas-high-schools/>

Civil society and teachers should be involved in the process of developing and agreeing on these metrics and tools for monitoring change. Participation of civil society would be crucial to ensure that monitoring is a participative and bottom-up process rather than one that is centrally driven and top-down.

Recommendations

- Proposed RTE amendments should be done without destroying its core character and in consultation with civil society actors working on its implementation.
- Introduce the NEP's implementation must be gradual (not across the entire state at once), sensitive and bottom up, reflect the aspirations and needs of teachers and other education workers, parents, local governance structures and other stakeholders.
- Change management processes in DIETs, BRCs, and CRCs including creating new roles and revision of job descriptions must be undertaken in a way that empowers these structures and is driven by talent within the existing pool of teachers in the system. It should not be top down.
- Increase spending on education to 6% GDP over the coming five years. Spending should be progressive and funding formulas must recognize and address inequalities in spending and overall development indicators.
- Ring-fence funds to protect school education from budget cuts or loss of resources during the pandemic.
- All schools need to gradually move towards the same levels of spending in line with KV schools.
- Any non-State funding needs to be additional to the state commitment to spend 20% of its budget for education and be aligned with State plans to ensure the integrity of the planning process.
- Do not rely on learning outcomes as the dominant metric of impact of education and quality. Develop innovative metrics of policy impact and quality like teacher collaboration and peer learning and a comprehensive list of indicators that include enrolment and equity indicators. Learning data needs to be anonymized, and no learning data of individual schools should be disclosed to avoid sorting effects.
- Design a participative process for developing innovative metrics of quality that involves teachers, community members and civil society organisations.

Conclusion

As the planning process for implementation of the National Education Policy gathers pace, we hope that children are kept at the centre of the process and that it is guided by principles of equity and the commitment to unleash the transformative power of education. This must be seen as an opportunity to strengthen the public education system and stem the rising commercialization of education. In the aftermath of the COVID-19 pandemic, there is likely to be a significant rise in the number of children who are out of school. Therefore, along with quality, the focus during the implementation of the policy must remain on universal enrollment of children.

The NEP suggests some bold reforms, however, it is crucial that this reform be assessed based on the impact it is likely to have on marginalized social groups and girls. Equally important would be the involvement of communities, teachers and civil society organizations in the process so that implementation is driven by the aspirations and needs of those closest to the ground rather than being a centrally driven, top-down process.

We hope that the measures suggested above would be considered during the planning and implementation processes. In addition, we would be happy to meet with you personally to discuss these recommendations in greater detail and also contribute to processes underway around implementation of the National Education Policy.

In order to support India's education system to recover from COVID, we would like to engage with you on tasks due this year related to mainstreaming of out of school children (61-64), provisions around equity (173), regulation of private schools (210-212) and most crucially, ensuring universal, free and compulsory access to schooling (217).

I look forward to hearing from you.

Regards,

Amitabh Behar

CEO, Oxfam India

Detailed chapter-wise Recommendation for Action Plan for National Education Policy (2020)

SN	Area	Action	Timeline	Responsibility
1. Early Childhood Care and Education: The Foundation of Learning				
1.		If the 3-8 has to function as a single unit, the children in this age group ideally need to be physically located together and all their needs met in an integrated manner. Across the implementation plan (Task 1 to Task 59) the foundational stage must be seen as 3-8 years and not broken up into 3-6 and 6-8 years in an inconsistent manner. This will ensure that the upward continuity of curriculum from preschool to early primary grades.		
2.		The Preparatory Class/Balvatika (Task 15 &16) must be seen only as an INTERIM measure. While this is needed presently, once the foundational stage education is universalised, children should be receiving good quality age appropriate preschool education for three years and transition smoothly to grade 1 at the same school premises. Opening pre-primary sections in primary schools so that 3-6 year olds are physically located in the primary school premises along with the 6-8 year olds already in primary school as one curricular and pedagogical unit.		
3.		The lack of reference to children of age group of 0-3 years in the NEP Implementation Plan is a matter of concern. In developing a curricular framework for Under 3s children, the NCERT must include strategies for meeting the care, stimulation, learning and multi-faceted development needs of 0-3 year olds through home-based and centre-based/Anganwadi based modalities, with a specific focus on enhancing the capacities of parents to provide nurturing and stimulating environments for children. A dedicated institutional provision for under-threes must be conceptualized and detailed in the NEP Implementation Plan, within the aegis of ICDS, which is operationalized by MWCD.		
4.		A training programme of 6 months for Anganwadi workers (Task 19) cannot be considered equivalent to a professionally qualified ECCE educators (Task 22, Task 23). This is inadequate given the theoretical understanding and the skill sets that need to be developed. The quality of learning and development experiences provided by these two cadres to the children would not be at par.		
5.		Inequities are likely to be perpetuated due to the proposed four different pathways for delivering ECCE. For the Anganwadi worker, preschool education is only one of the six services she is mandated to deliver and with shifting priorities within the ICDS, this affects the regularity and quality of the preschool education available to children. The NEP Implementation Plan must provide for a second ECCE trained AWW solely devoted to preschool education.		
MoE Task				
3		TLM for foundational stage. This will follow the developmental domains approach with a focus on development of early literacy, early numeracy and awareness of the immediate environment, with reasonable accommodation and adaptations for children with disabilities.). Similarly, the outcomes defined for the Foundational stage should include ECCE		
10		We strongly feel that this should include mention of an additional trained Anganwadi Worker		
12		This should include mention of responsive parenting programmes		

14	This should cover all children from birth to 8 years that covers the age and stage specific needs of birth to 3, 3 to 6, 6 to years children.
15	This should mention not only trained AWWs, but also additional AWWs
19	We feel that the existing clause needs to be replaced with a one-year online certificate programme for Anganwadi workers/teachers who are graduates, and a two-year online Diploma Programme in ECCE with qualifications of 10+2 will be designed.
21	This should include Initial professional preparation and CPD of teachers AND Anganwadi workers
22	This should include AWCs, not only primary schools in its purview. (This action must move above before TASK 19 to 21as above, so as to strengthen capacities of state agencies FIRST, before training of AWWs and ECCE teachers/educators. The timeline for this should advance to 2021-22 accordingly)
26	This should be prioritized as Task 1
Early Childhood Care and Education: The Foundation of Learning	
1.	The nomenclature of the proposed Foundational Literacy and Numeracy Mission to address the current learning levels in view of the existing learning crisis in schools, contradicts the Policy's own recurrent holistic vision for education by limiting itself to mere literacy and numeracy. It is recommended to realign the Foundational Mission for Early Learning Literacy and Numeracy with a focus on a holistic and updated vision for and definition of literacy and numeracy within the framework of all round development of the child. The inclusion of pre-primary stage within the mandate of this Mission will ensure continuity of the learning continuum, since many foundational competencies including the 21st century skills have their foundation in the pre-primary years. Accordingly, this new terminology should be used across the document.
2.	The NEP Implementation Plan assumes that the age of children for entry in Class 1 is 6 years across the country and overlooks the fact that majority of states have officially stipulated 5+ as entry age for Class 1. Given that there are significant maturational/developmental gains in each year within the early childhood stage, it is unfair to mandate the same ECE learning outcomes for children who graduate from preschool to primary at age 5+ as compared to those at age 6+. This anomaly needs harmonization.
3.	Inequities are likely to be perpetuated due to the proposed four different pathways for delivering ECCE for the age group 3-6 years i.e. (a) standalone Anganwadis; (b) Anganwadis co-located with primary schools; (c) pre-primary schools/sections covering at least age 5 to 6 years co-located with existing primary schools; and (d) stand-alone pre-schools. A larger percentage of children belonging to SDEGs attend Anganwadis in comparison to children of other social groups and they require more affirmative action from the perspective of social equity and justice. Good quality holistic ECCE is a proven strategy for reducing the equity gap. The FLN framework must be comprehensive in covering early learning, literacy and numeracy, including dimensions of socio emotional and essential domains of social, cultural and gender sensitivities which are so necessary to contribute and relate to society for 3-6 years' children. This must be implemented universally irrespective of location of ECCE services.
MoE Tasks	
28	The Ministry may refer to guidelines in Padhe Bharat- Badhe Bharat (MoE) and CARE-Ambedkar University Position paper on Early Language and Literacy (2016) for a balanced and comprehensive approach to early learning and literacy)
30	The vision of ECCE in this sub stage specific Curricular Framework must be distinctly stated with respect to two age groups – birth to 3 years, and 3 to 8 years.

33	Anganwadi Workers need to be also explicitly mentioned
34	NCERT and SCERT to also develop highly engaging, joyful, playful materials based on domains of development, imbibing local language and cultural practices for 3-6 years' children, not only for Grades 1-5.
35	For children with disabilities provisions will be made to assess them against their individual learning abilities and outcomes, and not against a normative examination system
39	The database of children enrolled should include both children in AWCs and schools
41	This effort to ensure availability of adequate number of trained teachers should include also additional trained Anganwadi Workers in each Anganwadi
58	Nutritious Breakfast. This Task must be prioritised before Task 27, and timeline advanced to 2021-22 in view of growing malnutrition rates (NFHSV early samples)

	Area	Actions	Milestones	Timeline	Responsibility
Ch. 3. Curtailing Dropout Rates and Ensuring Universal Access to Education at All Levels					
Overarching priorities					
<p>1) NEP Clause 3.2 - The policy's intent that well-functioning schools with good infrastructure is critical for ensuring retention is appreciated. It would be critical to ensure that these infrastructure standards do not fall behind RTE norms. Given that these apply to only elementary education, it would be desirable to develop similar uniform minimum national norms for the other stages of education. With regard to alternative and innovative education centres, it would be important to ensure that these centres do not replace existing special training programs intended to serve as sites of accelerated learning. Further, while civil society can provide technical support, it should be the core responsibility of the state to run programs for mainstreaming students who have dropped out or have never been enrolled. The centres should be seen as supporting the transition of students who are currently not in school to get enrolled in mainstream day schools school. It is essential that the centres not be treated as alternatives to mainstream day schools. Creating a new category of informal schools by amending Section 2 (n) of the RTE Act risks informalizing the school education sector and allowing the idea of lower quality of education for children from families living in poverty.</p> <p>2) The proposed expansion and strengthening of the NIOS and State Open School systems would be useful but it should not be seen as an alternative to enrolling children in formal day schools. In line with the provisions of the Child Labour Prohibition and Regulation Act, the emphasis should be on universal completion of formal education till age 14. Post this age, NIOS can be encouraged as an alternative for students who have dropped out or have practical difficulties in attending regular day schools. In addition, current fees for NIOS are too high for marginalised students to be able to afford affecting their access. Accordingly, fees should be waived for girls and subsidized for SEDGs.</p>					
MoE Tasks					
Task 64		While all the tasks listed are important, it would be important to place greater emphasis on strengthening modalities of tracking attendance with a view of preventing dropout. This requires institutionalizing a regular process of tracking attendance and identification of children whose attendance is broadly irregular, those undertaking long unexcused absence (e.g. 15 days) or dropping out (absence of 30 days). This should be not only tracked regularly, but also stock taken quarterly with the report of the status of each school and complex shared both with the concerned SMC/SCMC and the concerned officials in the Complex/CRC and through it to the Education Directorate. The child register of each school (Bal Punji) would need to be kept updated live.			

Task 69	Currently, residential schools are poorly monitored and often function in isolation and outside the mainstream governance mechanisms. There is a need to improve monitoring and also set up uniform norms and standards for these schools that ensure quality of education and child safety, particularly for girls and the SEDGs. Further, expansion of residential schools should not be at the cost of expanding neighbourhood schools, which should remain first choice in expanding access. Expansion of residential schools risks an increased imposition of the dominant language and customs of the state on children from marginalised communities. Instead of residential schools, seasonal hostels for migrant children should be prioritized.
Task 71	The appointment of social workers would need to be commensurate with the size of the complex's catchment area. A single social worker may not be able to do justice to the range of asks, including the outreach to the community. Only trained social workers should be recruited and deployed; the option of 'volunteer' social workers should not be considered to ensure professional standards are maintained in line with the provisions of the parent policy.
Task 81	The involvement of NGOs in building schools is problematic . The government should be building new schools to meet the unmet demand for school education. It is advisable to involve NGOs in providing technical support in the design of programs and materials to meet specific contexts instead of tasking them with running schools.
Task 73	The priority should be to hire teachers from the local community who speak the local language instead of deploying outsiders who will have to learn the language. Incentives proposed should focus on retaining existing teachers rather than on getting outsiders to work in remote areas.

Additional Tasks

1	Dropout and Out of school	Set up IT enabled national level mechanism to track and identify out of school children in age 8-18 years on annual basis	IT enabled system created to allow state to track each child and its education	2022-23	MoE and Department of Education
2		Develop an IT system to monitoring functioning of special training centres mainstreaming out of school children	MIS on special training system in place	2022	Department of Education
3		Revisit NIOS system to reach out to hard to reach children/context and improve quality	Updated framework for NIOS	2023-25	MoE
4	Prevention of dropout	Develop comprehensive implementation framework/plan and model to define extension of RTE including pre-primary and secondary education and put in place norms and standards for new stages of education	Plan for RTE extension	2021	MoE
5		MoE task 65- The comprehensive plan should look at a five year time frame in order to address demographic and other shifts instead of it being a single 10 yearlong plan which might get dated.	Comprehensive plan in place and being updated	NA	Department of Education
6	Child Protection	Each state to develop Zero tolerance policy having effective preventive and redressal mechanism to ensure safe and secure education for each child	GR system to track, monitor and address safety and security of children	2021-23	MoE/NCPCR/NCERT
7		MoE Task 82- Stringent child protection norms and processes should be set up prior to getting outsiders to interact with children in and outside classroom settings.	Child protection norms in place	2021	Department of education

Ch. 6: Equitable and Inclusive Education: Learning for All

Overarching priorities

1. It would be great if some new activities are added including
 - a) **Scholarships-** Existing allocations should be enhanced and amounts disbursed should be linked to the inflation index.
 - b) With regard to gender and other inclusion funds, **operating principles** would need to be developed.
 - c) **Special new provisions** for **girls** should be introduced including fees waiver for girls and SEDGs in secondary education
 - d) Introduce processes of undertaking social and **equity audits** in the education system in an ongoing basis.

- e) The **lens of social inclusion** and sensitivity should be applied to **all processes**, including curriculum and teacher training. It should even be built into the recruitment process to ensure that individuals with clear prejudices and discriminatory thoughts are not hired.
- f) Punitive actions on discrimination need to be introduced- in addition to sensitization, a **system to report grievances** should be established with stringent action to be taken against those indulging in behaviour that is discriminatory. DEO should take regular update of this committee.
2. **Part of the policy but appears to be missing from the plan:** Introduction of **additional 'Inclusion Fund'** schemes similar to the Gender Inclusion Fund to address analogous access issues for other SEDGs.

MoE Tasks

167	Expand the definition of SEDGs to include other vulnerable and at risk children like orphaned children, children living and working streets, married girls, children affected by conflicts, natural disasters and other emergencies etc. in line with the categories already listed in the National Policy for Children. Have clear strategies for each of these groups
169	Special Scholarships- targeted funding to SEZs, for special research on Inclusive education, alternative means of support to children to continue in Education (food/ tutors/ guided study / Instructional aides). The scholarships amounts should be enhanced and must be benchmarked to incremental increase with inflation.
171	Ensure that the funds for the same are additional and not replace existing work and resources on gender. Gender Inclusion Fund must include school and community-based sensitization programs (led by SMCs, Gram Panchayats, VLCPCs etc.) in addition to addressing infrastructural barriers and costs of education borne by families. As the policy directs, state governments must prioritize the identification of context specific barriers to girls' education and build strategies to address these barriers.
176	These <u>guidelines for safety</u> should also apply to other residential schools not just KGBV
187, 192-3, 198	These materials and training modules should not only be online given limited internet penetration at the household level. Based on currently available data, only 15% individuals in rural areas have internet access. Furthermore, since much of his would also involve change in norms and behaviours, it would be desirable for the trainings to have face to face interface .
194	It is hoped that these hostels are not just SC and ST students with a view of promoting social inclusion and addressing the existing trend towards segregation of Dalit students. Ensuring a mixed setting would be key to promote social inclusion and address the existing trend towards segregation of Dalit students.

Additional tasks

1	Policy framing for Equity	Policy framework and action plans in place to address the specific barriers to the education of the SEDGs and address other forms of educational inequality. Set up minimum standard / criteria for non-discrimination, safety and, equity and inclusiveness that all schools should be expected to follow and put in place mechanisms for GR for the same	State policy frameworks are in place	2022	Department of education
2		Develop a Plan with Special focus on strengthening of decentralised teacher support systems to address the context specific needs of marginalised children and children in difficult circumstances and emergency	The plans developed through based on consultative process	2021-22	MoE and state government
3		Develop special plan/strategy for schools in urban areas based on population index and complexities.	Special plans and strategies for urban areas are in place	2022	MoE, Department of Education
4	Review of performance	Conduct periodic research/third party evaluation by renowned agency/institutions to measure the effectiveness of special programs in SEZs	Third party reviews of work with SEZs and SEDGs undertaken	NA	MoE, SCERT

5		Review preservice training program of teachers and education administrators from equity perspective	Gaps and needs identified	2024	SCERT
6	COVID Impact	Mitigating the impact of COVID 19 on girls and SEDGs: Put in place mechanisms for accelerated learning/special training for out of school children, including those under 14 years of age, and review performance of accelerated programmes underway.	Mechanism in place and funded	2021	MoE, Department of education

Chapter 7. Efficient Resourcing and Effective Governance through School Complexes/Clusters

Overarching priorities

The idea of school complexes as laid down in the NEP holds potential for systemic reform of the education system provided concrete steps are taken to ensure their adequate staffing and resourcing and adequate space is provided for citizen participation around them. Some of the principles to be kept in mind while planning this should include:

- **Respecting the autonomy** of the **individual** member **schools** and AWCs as a unit- to be appreciated the complex should add and not subtract from the resources available to the individual units and not dilute existing RTE norms
- **Avoiding duplication of roles and minimizing disruption through undertaking avoidable administrative restructuring.** The coexistence of the CRC and Complex would be counterproductive and it would be **desirable** to have **one body** vested with **academic** support (e.g. CRC) and **another** with **administrative** responsibilities (Complex). While doing so, it is important not for one to be more powerful than the other. For instance, if the complex has administrative powers, it might be considered holding more authority than the CRC thereby disempowering that position
- Processes must be adequately staffed and **resourced**
- Formation of complexes is not seen as a standalone process, but is part of larger organizational restructuring of the department/directorate of education and change in the stages of education
- The process of change needs to be a phased process of change- this includes a gradual process through which changes in the various domains, levels (the stages) and geographies would be changed to avoid changing all components at once.
- Process of change needs to be managed by providing support
- The real test of impact is the consequences it would have on the poor, marginalized communities and girls

Some of the specific changes that would be needed include:

1. The government should introduce a division of roles between the CRC and the Complex to avoid duplication of efforts and enhance synergy between interventions. **The CRC may remain vested with an academic role and the Complex can move towards a more administrative unit** to ensure availability of resources including staff and other resources. However, it may be desirable to hold consultations with the concerned block and district level officials (education and other line departments delivering education) to better understand the modalities of making this happen- viz. decentralization of powers and resources to these two structures
2. Creating of the Complex as a tier would entail **restructuring** ways of **working** of the **existing structures**. This includes the structures for
 - a. Community participation- SMCs/AWCs, PRIs/ULBs (as LAs under the RTE Act) and Complex management committee
 - b. CRCs and Complex
 - c. Schools/AWCs and Complex

- d. Complex and layer above it: this could be the block administration or some form of supra-block structure (called the " Super-complex" in Goa)
3. It would be important to ensure **adequate staffing** of the complex to undertake the new responsibilities. This includes.
 - a. A full time leader with adequate secretarial and finance staff to undertake the work expected would be required to provide support to build up the complex as an administrative and planning unit that would cover (assuming a catchment area of 5-10 km in line with the policy) some 5-7 schools, 15 Anganwadi Centres and some additional educational institutions like vocational centres/adult education interventions.
 - b. A concrete plan for hiring of teachers and other staff needed for the functioning of the unit
4. The School Complex is anticipated to have **resources in common for the entire unit**. This is an opportunity to reinforce the role of SMCs in determining how to use these funds through creation of SDPs and SCDPs. Clear guidelines and funded plans are needed to ensure these are utilized by the various stakeholders including
 - a. **Supporting children to access the complex**, including provision of transport, escort etc. to travel to the complex to access the newly established resources (e.g. Laboratory facilities etc.).
 - b. Supporting **teachers** through creating a **roster** and **funding plan** to provide support of newly appointed teachers/personnel appointed to the complex to ensure all schools (irrespective of the distance from the higher secondary school anchoring the complex) are able to deliver the School Complex Plan.
 - c. Building **reporting lines** of the head-teachers and the complex leads to ensure enhanced coordination and line management of personnel
 - d. Put in place a mechanism to strengthen systems of support for the complex through coordination of the work of the CRC and the complex
 - e. Care is taken to ensure that the central hub school and its resources do not overshadow individual schools. This would be critical from the perspective of equity to ensure that educational institutions in larger villages do not pull out funds from the individual schools in the more remote rural areas.
5. It would be desirable to develop a **comprehensive framework** for the **functioning** of the **SCMCs** that would also respect the autonomy of the individual school forming the cluster and providing for social accountability and citizen participation in planning. In order for this structure to play the variety of roles expected, it would be desirable to
 - a. Ensure that citizens including parent-leaders of the SMCs (SMC presidents) and Anganwadi Centre Management Committees form the majority of the SCMC
 - b. Include **discretionary** and formula-based **funding** for collective actions to be undertaken by all SMCs of a complex to create a common sense of identity for the SCMC
 - c. Have clear spaces for regular liaison with education institutions administered by other line departments lying within the complex (SMC AWWs, Supervisors) and these would also need to become parts of the SCMC
 - d. **New training modules and other materials** would need to be developed for the newly created structures to function in a manner that reflects the aspirations of the policy, further existing mandates including that under the RTE Act and are in line with existing best practice of working with and empowering SMCs (and their federations)
6. SMCs are currently mandatory and have legal responsibilities only for the elementary education stage.
 - a. The chapter should explicitly state that the **structure** will be **extended** for **all grades**, having similar powers as given in the RTE Act.
 - b. SMCs would need to be established in **private schools** and given some degree of decision making power to enable parents to have power in decisions affecting them.
 - c. Similarly, empowered and resourced structures for community participation would be needed for a) Anganwadi Centres (possibly through a review of the roles of the Anganwadi Centre Monitoring Committee) and B) residential institutions (where regular meetings of parents may not be feasible).

- d. Existing structures for community participation in education- SMCs and PRIs/ULBs (as Local Authorities under the Act) need to be revised.
 - e. Existing materials for training of SMCs and Local Authorities need to be revised. These would need to be in line with the responsibilities vested under the RTE Act, strengthen the practice and push the envelope further, especially ensuring that there is adequate focus on addressing the rights of girls and children/parents from Dalit, Adivasi, Muslim, children with disabilities and other marginalized communities.
7. The introduction of the School Complex Development plans must not be seen in isolation, but as part of reform of the entire chain of planning to ensure that the state plan reflects the aspirations and needs at the bottom level. In doing so, it would be particularly important to look at the experience of the implementation of SDPs that frequently not formed the basis of final allocations. Accordingly, the recommendations are to
- a) Clearly delineate for which activities the allocations would be made based on UDISE data to save transaction time filling the formats.
 - b) Ensure that each complex has **adequate discretionary funds** to ensure quality in each school. Care must be taken to ensure that funds are not concentrated in the School Complexes and that improvement in infrastructure is done in the individual schools. Individual schools must continue to have discretionary grants for their specific uses, independent of the funds with the complex.
 - c) Undertake an **analysis** of the **fund flow** to address bottlenecks to timely and adequate spending. Automating some of the fund flow, particularly authorization of expenses, would save transaction time and costs.
 - d) **Strengthen coordination** with **PRIs** and **ULBs** to ensure adequate inclusion of education in PRI Development plans. The DEO should be part of the process of the finalization of the District education plans and the DM to be included in the preparation of the district education plans. Similar modalities should be established for engagement with other concerned line departments delivering education in the district, particularly MWCD (from the perspective of the ICDS system) and MSJE (for persons with disabilities and other marginalized communities)
 - e) Ensure that the actual **formats** for filling of the plans are **simple** to enable non-specialists to take part in the process of planning.
8. A **change management process** for the policy would need to start with a process of ensuring that complex heads internalize the expectations from the NEP and the changes being considered before the roll out of the complexes. The transition would need to be gradual (not across the entire state at once), done in a manner that is sensitive and bottom up, reflecting the aspirations and needs of parents, including local governance structures empowered by the 73rd and 74th Amendments
9. **Put on hold the process of closure/merger** of existing low enrolment schools to allow for their integration in the complex as an alternative to closure that has been built into the policy. The closure/merger of schools should not result in dropout of children
10. Some additional issues related to synergy would need to be addressed.
- a. Modalities of convergence with the MWCD which would presumably continue to retain the responsibility as the line department for Anganwadi workers on dimensions other than delivery of preschool education. The future of the structures provided for under the currently prevailing ECE policy including the ECCE Council and the dedicated ECE Cells would need to be dealt with.
 - b. Modalities for engagement with other line departments responsible for running schools (e.g. Ashramshalas) or having a role in education (e.g. Panchayati Raj). The realities of engagement with residential education institutions (where formation of SMCs is not feasible) is also not dealt with.

- c. Modalities of **operationalizing** the idea of a **Complex in urban areas** (having much larger schools) may need to be understood better. A single government school in Delhi may have 10-50 teachers (in Corporations vs State Government schools respectively). Alternative governance systems would need to be built for such spaces to serve the functions envisaged for the Complex.

14. Alternative modalities of working would need to be evolved for urban areas since the modalities of participation would need to be different.

MoE Tasks

204	The creation of the complex would need new mechanisms for measuring impact. MoE task 204 (pilot studies of effectiveness of grouping) <ol style="list-style-type: none"> Metrics of success should include not just learning outcomes under the NAS but also teacher collaboration, enhanced peer learning, growing enrolment and equity indicators. Civil society and teachers should be involved in the process and the range of tools should include social and equity audits of the interventions
205	MoE task 205 (twinning of public and private schools). <ol style="list-style-type: none"> This needs to be seen as part of an overarching modality of regulation of private schools under the next chapter. The process should prioritize ensuring that private schools contribute to the performance of the complex and the government school system which remains the principal modality of educating the majority of India's population, particularly the marginalized populations in a manner that is a meaningful manner that improves the schools' core functioning.
208-9	The new tasks under MoE plan 208-209 (Samajik Chetna Kendras) would require attention to ensure that doing this <ol style="list-style-type: none"> Doesn't add non-teaching work for teachers and other personnel. It is unclear whether the policy has considered the need that some of these facilities would need to be staffed over the duration when they are open. E.g. a laboratory assistant for the lab, an IT support person or a library assistant for managing the library. Leaving these facilities open and not staffed risks the users' safety (e.g. labs) or usability of these facilities by the students themselves (e.g. school libraries or displays within classrooms) Should not provide a barrier to provision of education. Thus, education in village schools are often disrupted when schools are used as shelters during disasters or for accommodation during marriages Are mutually beneficial to the school and in alignment with its goals. Students should be able to access these without financial burden to them or their school. Ensure that the facilities of the school (including school display, reading materials etc.) are not in any way damaged or displaced in the process and overall child safety is not impacted. Does not raise child protection concerns through the use of schools by other stakeholders Remains uncommercial in character Ensure that these spaces are secular in nature and are not used for propagating a particular religion or ideology

Additional tasks

1	Framework development	New Norms, monitoring management, governance (including linkage to bodies under 73rd/74th Amendments) human resource policy, recruitment policy and JD, for additional staff at complex would need to be developed in line what is envisioned in the NEP. There would also need to be agreement on process of revision	Framework in place after a process of consultation with all stakeholders	2022	MoE and state government
2	Operationalization of the complex	Undertaking mapping of schools for eventual integration into a complex and resulting recruitment/redeployment needs and identifying areas with inadequate availability of ECE and Secondary education facilities requiring upscaling of existing government provision to ensure universal access.	Mapping of schools in place and accepted by stakeholders	2023	Department of school education

	The MoE tasks 201-202 provides for a period 2022-30 for the realization of the concept. This needs to be further broken down.	<p>Consultation with PRIs, SMCs, communities at large and other relevant stakeholders to ensure acceptance of the same</p> <p>Orientation and sensitization of eventual complex leaders</p>	Eventual Complex leaders understand what is expected of them		
3		Set up school complex in each district	Complexes exist	2024	Directorate of school education
4		Hiring or deployment of staff as per school complex policy and norms	Complexes are adequately staffed and resourced	2024	Directorate of school education
5	School Complex Committees	<p>Develop a comprehensive framework for SCDMCs, revision of existing frameworks for SMCs- membership, job responsibility and accountability along with its linkages with district administration, mechanisms for training and support, resource base to enable functioning of the same.</p> <p>Laying down the framework for the development of School Complex development plans (SCDPs), revision of SDP formats and revision of bylaws to ensure funds allocation in line with the plans. Agreement on process of revision.</p>	Framework for SCDMCs and SCDPs are in place and existing frameworks for SMCs and SDPs revised	2024 <i>(can start earlier to ensure sync between SMC elections)</i>	DSE and SCERT
6	Operationalization	Establishment of School Complex Committees	SCC in place	2025	Directorate of school education
7	School Complex committees	Development of training materials for the School Complex Committees, revision of the SMC training materials	Training materials for SCMC and SMCs are in place	2025	Directorate of school education
8		Orientation of members of the SDMCs and SMCs based on new framing	Members of the complex committee recognize the role anticipated of them	2026	Directorate of school education

Chapter 8. Standard-setting and Accreditation for School Education

Overarching priorities

1. **MoE tasks 210 and 214** should be tasked to the Department of education and SCERT and not just the SCERT. While the academic content should be led by SCERT, some of the administrative decisions necessary for their implementation would entail dialogue and joint decision making with the department.
2. Ease of Doing Business for private schools: **MoE task 211** (ease of doing business) **needs** to be **reconsidered**. The distinction between private vs philanthropic private schools is dangerous and should be avoided to not legitimize the notion of for-profit education. **No compromise** must be made on the existing legal principle that school **education** is a **not for profit domain** and private schools must not be run by commercial operators or allow profit making in education.
3. One of the principal tasks under this section is the **establishment of the SSSA**. Some of the considerations for its functioning should include ensuring that
 - a. Norms do not retrogress from the **RTE norms** in terms of quality and equity.
 - b. The modalities of functioning of this body need to address the clear and present danger of conflict of interest arising from setting standards and their monitoring, especially with the requirement that the regulatory framework would be light.
 - c. Where fees regulatory structures already exist under pre-NEP state legislations, these need to be notified as the regulatory bodies to **avoid duplication of efforts and structures**. Where these bodies do not exist, it would be important to learn from the experiences of the various states to ensure that the architecture of the SSA learns from past experiences of regulation.
 - d. The **body** needs to be **multi-tier** (state, district and below) and include legal representatives and administrative bodies
 - e. The structure would need to be tight and the structures thus created would need to be empowered and vested with **adequate resources** and human capacities **to enforce** the regulatory framework given the past track record of private schools failing to comply with regulatory frameworks. Doing so is also critical to ensure that the bodies have the minimum needed to deliver results and without creating conditions of regulatory framework arising from acts of commission or omission. Much of the complaints about the illegal behaviour by inspectors with respect to private schools is because private school inspectors are currently inadequately staffed and resourced. This would need to be enhanced.
 - f. The regulatory resources currently within the Department of education would need to be transferred to the SSSA to enable it to enforce its directives.
 - g. It would be advisable to include **representation** from the SCMCs or other **parent/citizen bodies** to ensure that parents have a voice in the decisions around their schools. This should include representatives of parents of private schools, not just government schools.
4. It would be critical to (**MoE task 210**) ensure transparency in the functioning of private schools and mechanisms to act on the information disclosed. This would entail putting in place
 - a. Process of **disclosure of basic information** about the school publicly on a portal and in hard copy for those without online access. Modalities of proactive disclosure of information would need to be laid down for both public and private schools. It would be advisable to bring private schools under RTI to ensure that this information could be obtained if it is not being made public by the private school.
 - b. Process of **registering offenses** under the Act would need to be prescribed- applicable to both government and private schools.
 - c. There needs to be **gradation of penalties**, leading up to cancellation of permission for private schools, but not limited to the same.

- d. Process of **investigation of any complaints** filed and timeline for the same. Many of these modalities are already in existence for government schools but would need to be developed for private schools. The reporting lines and division of roles would, however, need to be considered in view of the proposed restructuring of the education departments/directorates.
 - e. Modalities of interaction of the SSSA and the SCPRCR/NCPCR would need to be considered given the introduction of the new structure
 - f. Modality of **auditing private schools** would need to be put in place, including transparency in the same to ensure that the principle of education remaining a not-for profit domain is not compromised.
 - g. Modality for **monitoring and verifying the claims** made by the private schools in their submissions would be critical.
 - h. **Disclosure of blacklisted schools** who have failed to adhere to norms or falsified information in their submissions to the government.
5. The process of division of the Department and Directorate of Education would focus not only at the state level, but also all the way down within the system (**MoE tasks 213, 214**).
- a. There would need to be a **change management process** within the SCERTs and the departments themselves before proceeding on change management within the system.
 - b. A process of change management would need to be undertaken within the DIETs, BRCs, and CRCs etc. This would entail creating new roles, revision of job descriptions and revision of roles. Vacancies would need to be filled at the earliest.
 - c. Some of this hiring would need to be undertaken through **identification of talent within the existing pool of teachers** in the system. A process of identifying well performing teachers would need to be undertaken and these deployed to DIETs and SCERTs as resource persons. A formal process of selecting these would be required to ensure that the right people are selected. These would need to include a mechanism to evaluate their practical skills, not just theoretical knowledge. This should not be treated as a one-off process, but steps taken to internalize this and ring-fence the process from political changes to ensure that this process is allowed to succeed.
 - d. A similar process would be needed for the CRCs and this practice should be a permanent process not a temporary solution.
 - e. Care would need to be taken to **promote autonomy** of the **CRCs, BRCs and DIETs** and not run this process of change as a top-down process from SCERT or the department/directorate.
6. Other processes of change would be needed to supplement the above process of change.
- a. Ensure that the DIETs and other structures are located in appropriate locations to enable them to be used.
 - b. Provide **discretionary funds** for DIETs, CRCs and BRCs to enable them to undertake actions of their interest with a view of fostering autonomy.
 - c. **Reduce administrative** work of CRCs/BRCs transferring some of these tasks to the Complex.
 - d. The process of twinning of public-private schools would need to be seen as part of overall reforms around organizational change and should be undertaken in a manner that is mutually beneficial for both government and private schools and fosters a true sense of partnership. Cosmetic one-off measures without long term positive impact for the government schools should be avoided.
7. The chapter places considerable emphasis on assessment of impact. This process (**MoE Tasks 218-220**) would need to be undertaken in a manner that promotes a comprehensive definition of quality and does not create negative equity effects.
- a. Reporting of **learning data** would need to be **anonymized** and be undertaken in a manner that does not lend itself to simplistic comparison of public and private schools since this risks feeding sorting effects. No learning data of individual schools should be disclosed and the learning outcome data should only be disclosed for the complex as a whole (including both public and private schools in the catchment area). Doing so would provide an incentive for the schools to cooperate.

- b. The analysis of impact of schools should go beyond learning outcomes and include a wide range of metrics, including strong focus on the performance of the SEDGs.
 - c. **Avoid census based SAS (MoE task 219)**. Funds would be spent better in improving learning instead of testing all students in the state without discernible benefit being accrued to individual students.
8. Care would need to be taken to ensure that the specific needs of girls and SEDGs are addressed during the course of the process.
 9. The **role of other line departments** with a role in delivering education (e.g. MWCD, Social Justice and Empowerment, Tribal Affairs etc.) in the delivery of this policy would need to be expanded and representation of concerned officials built in the structures proposed. At the same time, the need for sensitization of District Magistrates, Collectors and other Administrative Services Cadre officers on the policy would be needed to enable them to support the policy's implementation.
 10. It would be desirable if the government also addresses the **regulation** of the **shadow education market** of private tutoring. Countries with a large private tutoring market tend to have regulatory frameworks to regulate teacher qualifications, instructional hours, fees and other provisions and this should also be addressed given the policy's explicit opposition of the tuition culture.

MoE Tasks

Task 222	These trainings should not only be online, but also face to face given the low internet penetration prevailing at present.
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Additional tasks

1	Creation of new structures and division of roles	Process of sensitization of the administration on the NEP to enable middle level of administration to understand intention of the policy- the why in addition to the what	Administration sensitized to provisions	2021	MoE, Department of education
2		Development of vision documents and plans for the new individual structures	Vision documents in place	2021	Directorate of education
3		Resource mapping required to enable these new structures to undertake the work required	Resource gaps identified	2021	Department of education
4		Hiring or redeployment of personnel to take on new roles	All personnel are in place	2022-24	Directorate of education
5		Restructuring of inter-departmental committees nationally, at district, state levels	Education administration streamlined to NEP vision	2023-24	Department of education
6		Revisit role of NCPCR and SCPCRs in view of expanded ambition in terms of education	Role clarity in place	2021-22	MoE, MWCD
7		Revision of auditing framework for private schools	New auditing modality agreed	2023	Department of education

8	Development of regulatory frameworks	Online portal with information on all schools functional	All private schools abide by disclosure and other norms	2026	Directorate of education, SSSA
9		Design a consultative process involving parents, civil society organisations, academicians to develop the GR system for private schools	GR mechanism is in place	2021	Directorate of education
10		Develop an effective grievance and response mechanism/portal (in line of RTI) at district and state level related to regulation and malpractices of any school imparting school education. The sub section C. mentions 'transparent public disclosure of all basic regulatory information laid down by the SSSA- under this the recommendation is to disclose information in accordance to the Section 4 of the RTI Act. In case there are additional indicators over and above the points mentioned under Section 4 of the RTI Act, SSSA should go ahead disclosing them. But the information requirement should not be the violation of the RTI Act.	GR mechanism is in place	2023-24	MoE and state government

Promotion of Indian Languages, Arts, and Culture

Tasks 259-264 should explicitly address tribal and other local languages

Online and Digital Education: Ensuring Equitable Use of Technology

Overarching priorities

With respect to the specific tasks identified,

1. **MoE Task 271-** pilots should prioritize models that rely on in-school infrastructure over provision of education online reaching out to individuals
2. **MoE Tasks 272-274, 279-280-** emphasis should be placed on **developing content** in **tribal** and other languages. Mechanisms need to be put in place to ensure involvement of teachers in content development and in taking feedback of parents and students. Steps would need to be taken to ensure content is inclusive and doesn't promote stereotypes and discriminate. It would be important to ensure representation of different groups etc. as for textbooks.
3. **MoE Task 275-** good, but may need to be also done in other areas given we have around 40% penetration of secondary schools with computers at present.
4. **MoE Task 278-** It is unclear why this only flags online training? At the same time, it would be important to ensuring digital infrastructure to an extent. Furthermore, learning centric pedagogy can be learnt effectively through its practical application and observing lessons in a real-world environment rather than through attending online lessons.
5. **MoE Task 280-** DIKSHA and SWAYAM have been around for a while and they should be **evaluated** before creation of the proposed virtual labs. This evaluation should include an expert review of the content as well as feedback from teachers on quality of content and usability of the platforms.
6. **MoE Task 281-** Excessive focus on **nationally designed assessments** risks an increase in 'teaching to the test' and a reduction in teacher autonomy. These assessments should only be used for checking the health of the system and **shouldn't supersede** CCE or formative classroom assessment by teachers. Further, DIETs and SCERTs should retain autonomy in designing assessments for their context instead of administering nationally designed assessments.

In addition, we feel the following core principles need to be adhered to during the course of implementation.

1. **Distance** learning materials and activities must follow the Principles for Digital Development¹⁸. These are nine guidelines that are designed to help integrate best practices into technology-enabled programs and are intended to be updated and refined over time.
2. The priority should be to support **delivery of digital instruction in school/institutional settings, instead of individuals**, to ensure maximum use of existing infrastructure and to minimize the risk of further aggregating the digital divide.
3. **Digital modes** should **not** be the sole or even **dominant** mode of teacher training or **delivery of content** to students.
4. Technology use for teaching should include a **two-way interface to enable interaction** between teachers and taught.
5. Strengthen support to teachers, parents and other caregivers to support digital delivery. This includes **equipping** them with necessary **devices**, ensuring availability of **data** and **capacity** to use this technology. Specific efforts would also be made to **ensure safe use of technology**.
6. Build in **mechanisms** for gathering **feedback** and monitor reach of existing and future modes. **Community members need to have space to participate safely, without discrimination in the analysis, design and implementation of new distance learning responses**. It would be advisable to undertake an **evaluation** of **existing** forms of **digital modes** of training should be undertaken, taking feedback from existing users including teachers, DIET/CRC/BRC personnel and students, etc. This would provide useful information to understand effectiveness of existing interventions,
7. Steps need to be taken to **promote Free Open Source** resources and technology for delivery of digital interventions
8. Focus needs to be taken to **ensure data privacy**, particularly to avoid personally identifiable data pertaining to minors is not shared with other players by service providers, vendors, schools or education functionaries.
9. All **materials need to be age appropriate, be in the students' mother tongue** (including for tribal languages) and **avoid gender and social stereotypes**. Education technology has the potential to exacerbate inequities (in relation to access, capacities and costs), therefore, concrete efforts need to be taken to ensure all interventions do not inadvertently further discrimination and inequality.
10. Take steps to ensure safety of children online, including **protection** from **cyberbullying**
11. Clear mechanisms for **regulation of private education publishers and ICT providers** in education (in line with the existing ICT Policy in education) should be reiterated, including the requirement that **services be kept not-for profit**.

25. Strengthening the Central Advisory Board of Education

Overarching priorities

It would be important to also prepare **framework for restructuring of CABE**. This appears to be a missing task.

26. Financing: Affordable and Quality Education for All

Overarching priorities

1. The implementation of the policy is predicated on **availability of adequate resources**. However, both the policy and the MoE roadmap does not address the question of additional funds. Accordingly,
 - i. A **clear roadmap** would be needed to ensure states and the central government **spend 6% GDP on education**. Ideally, the timeline for reaching the target of 6% should be five years.
 - ii. Care would need to be taken to ensure that spending is progressive, with greatest investment in the lower tiers of the education system. The needs for expanding the tertiary education system should not compromise the urgent spending needs of Basic education.

¹⁸ <https://digitalprinciples.org/>

- iii. Some of the educationally lagging states are already investing close to 20% of their budget to education, it is not clear whether additional funds would be available to fulfil the ambitious vision of the policy. Additional financial support would be needed for these lagging states to address educational inequalities across states. This responsibility may need to be borne by the Centre.
- iv. It would be critical to also undertake costing of how much the Policy's implementation and activities would need to be phased based on the funds anticipated to be available.
- v. Critical to ensure **equity in financing** to address unequal per child spending between and within states. It is difficult to explain why per child in AP for elementary education should be 6398 per child which is almost thrice that of INR 2584 that is spent in adjoining Telangana. Similarly, interstate spending differences exist which make it difficult to ensure delivery of quality education in remote rural areas. Funding formulas adopted should recognize the existing inequalities in spending and overall development indicators of individual states (that affect their capacity to raise revenues)
- vi. The per student expenditure of Kendriya Vidyalayas is about INR 27,000^x, which is four times the per capita education expenditure in Delhi and six times of India. All schools need to gradually move towards the same levels of spending as for the government's own KV schools.
- vii. Ring-fencing of funds would be essential to protect school education from budget cuts or loss of resources during the pandemic (e.g. through drop of GDP value). The COVID-19 context creates new funding needs that would need to be accounted for.
- viii. Any non-State funding needs to be additional to the state commitment to spend 20% of its budget for education. All the additional funding needs to be aligned with State plans to ensure the integrity of the planning process. Furthermore, CSR funding is skewed in India with most revenue in the south and the need in the north. Proactive efforts would be needed to ensure that the funds are spent in the most educationally lagging states.

2. Some of the provisions under the MoE set of tasks carry the risk of increasing privatization and commercialization of education. States should push back against any measures that risk increasing commercialization and privatization of education, with the efforts instead concentrated on strengthening the public school system

- ix. **MoE task 288** (EoDB national guidelines)
- x. **MoE task 292**- State PPP policy
- xi. Higher Cost recovery (**NEP section 26.7**)- should not compromise the principle of education being a not-for-profit domain

3. **MoE task 291** (incentive to states to improve performance)-

- xii. It would be critical to ensure that states build capacities before incentivizing performance.

4. **NEP 26.4** This list needs to include issues of equity, with the real test of the policy being to ensure that the provisions reach poor and marginalized communities and girls. Work on online education should prioritize internet access and equity before mainstreaming this approach.

5. **NEP 26.5.** The present section should also prioritize

- xiii. Ensuring of fund flow to the district and last mile, not just to the states.
- xiv. Concrete measures would need to be taken to streamline fund flow and address other reasons for under-spending.
- xv. Performance based funding to the states is potentially risky.

6. **NEP 26.7**- The process of adoption of schools

- xvi. Funds thus raised should be additional and not crowd out existing funding.

xvii. Steps would need to be taken to ensure equity by prioritizing investment in schools with the highest unmet funding needs and having high SEDG populations.

Additional Tasks

1	Preparation	Costing the policy	Realistic estimate of costs required for implementation of the policy until 2030.	2020-21	MoE
2		Research to understand and address the reasons for underspending predating the setting up of new systems	Underlying reasons and bottlenecks are identified	2021-22	MoE, DoE
3	Fund flow	Central government will make allocations and negotiate mechanisms for addressing funding gaps for educationally lagging states	MoE starts making its own funding at enhanced level	2021-22	MoE
4	PPPs	It would be desirable to maintain a MoU database of State, district and central governments to ensure transparency in terms of the nature of tasks, finances involved and details of the conditions	Transparency in PPPs in place or negotiated	2021-22	MoE Department of education

27 Implementation

Overarching priorities

1. Infusion of resources (NEP 27.2, pt. 6) would also be needed to the sub-state level.
2. **MoE tasks 293-4** (viz subject-wise implementation committees) need to be include teachers and civil society representatives.
3. The **MoE task 295** (RTE amendments) should be done in a manner without destroying its core character and in consultation with civil society actors working on its implementation.
4. The list of domains under the **MoE task 296** (yearly reports of progress) should
 - i. Be expanded to include all salient domains of the policy, particularly with a view of addressing educational inequalities, ensuring equity, addressing gender concerns and those of out of school children.
 - ii. Need to also feed other processes related to the policy shifts. These should include
 1. Sharing with the CABE committee
 2. Support state process of planning that would feed into the AWPB
 3. Be shared with the Parliamentary Standing Committee and State equivalent committees
5. Include comprehensive review of the Policy to be included in 2030 and 2040