

**On
National
Education Policy 2019**

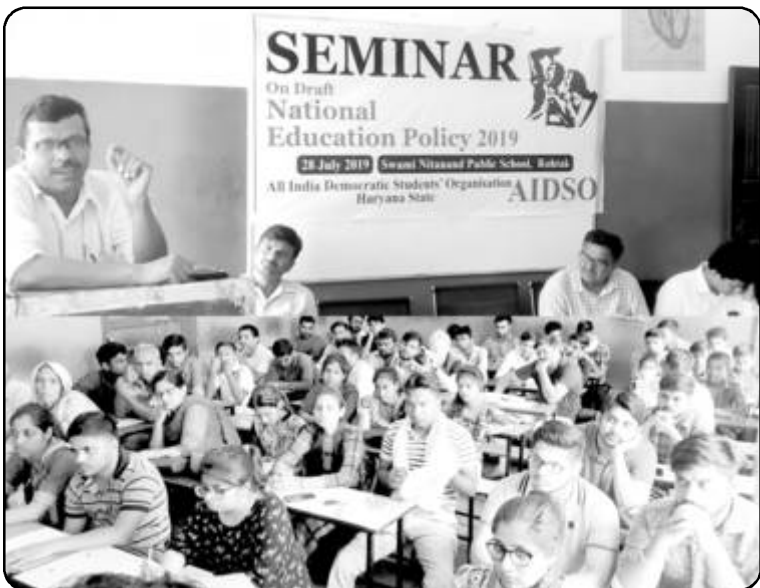
AN ANALYSIS

All India Democratic Students' Organisation

AIDSO



Prof. Ravindra Kumar Verma 'Ravi', the Former Vice-Chancellor of Bihar University in Seminar on Draft NEP 2019 at Muzaffarpur, Bihar on 29 August 2019



Com. Kamal Sain, the National President of AIDSO discussing in a Seminar at Rohtak, Haryana on 28 July 2019 against Draft NEP 2019. Com. Mukesh Shemwal, Vice-president of AIDSO and Senior Journalist Mr O.P Tiwari also placed their opinion.

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PREFACE

Eminent personalities of the Renaissance movement contemplated education for all irrespective of caste, creed, religion, sex and socio-economic status. They viewed secular, scientific and democratic education system as a weapon to eradicate the medieval darkness, religious bigotry, superstitious belief, obscurantism and blindness prevalent in the society. The demand for such educational system merged with people's cry for emancipation within the freedom movement of India. But this demand remained unfulfilled in free India.

After independence, no government did pay any attention to the cherished aspirations of the freedom movement. Rather all the governments at the centre and states restricted education on one hand and stripped off the democratic essence and scientific content on the other. There was a paradigm shift in 1986. The Congress government at the centre perceived the education system as a 'unique field of investment' and the process of the privatisation and commercialisation of education initiated openly through the 'National Policy on Education' (NPE-1986). Thereafter many committees and commissions have been formed and their recommendations intensified the process.

Further, the BJP-led central government had undemocratically prepared the Draft National Education Policy 2019 (Draft NEP-2019) and invited suggestions to deceive the people. However, we have also submitted our opinion on that Draft NEP-2019 to the Ministry of Human Resource Development (MHRD) on 14 August 2019. Now, the central government has prepared a 55 page National Education Policy 2019 (NEP-2019) ignoring the opinion of the educationists of the country and adamant to implement it.

This NEP-2019 has retained the essence of Draft NEP-2019. It does not differ with the earlier policies. Rather it advocates for stronger and more centralized efforts for commercialisation,

communalisation and fascistic centralisation of education. It is the blueprint of a direct attack on the secular, scientific and democratic concept of education. It is designed to revive fanaticism and obsolete ideas of medieval period through faith-based education. So, the need of the hour is to build up a nationwide mass movement against this monstrous attack on the education system.

In the given situation, this booklet has prepared based on our opinion and suggestions to MHRD on the Draft NEP-2019. We hope that this booklet will help the students, teachers, educationists and common people at large to realize the intensity of the attack on education. Suggestions from all concerned are highly solicited to enrich this booklet further.

With greetings

31 October 2019
Kolkata

Ashok Mishra
General Secretary, AIDS0

Draft National Education Policy 2019

- AN ANALYSIS -

The Ministry of Human Resource Development (MHRD) in a deplorable approach released the 'Draft National Education Policy 2019' (henceforth Draft NEP 2019) through the internet on 31 May 2019 and allotted only a few weeks' time for suggestions and comments on such a long document [484 pages (English) and 650 pages (Hindi)] meant to overhaul the education policy of the country that would decide the fate of education for decades. Likewise, the summary of the document prepared in 19 languages also couldn't reflect the real design of 'Draft NEP 2019. On the other hand, the document has become voluminous and overloaded with unnecessary explanations and descriptions but lacks logical constructions at many places. Even it has introduced many 'new concepts' without any proper explanations. So, it has become very difficult for the people from all walks of life to get involved in the process.

Undemocratic Process of Formulating Draft

It is but natural for anyone concerned with education of the country to expect that the task of formulating the education policy is assigned to a public committee of renowned, upright, rational and democratic-minded educationists and such eminent personalities from different walks of life. But the process followed by the MHRD to evolve such a policy was far from this desired path. Initially, a 5 member committee, mainly of bureaucrats called 'Committee for Evolution of the New Education Policy' under the Chairmanship of Mr T.S.R. Subramanian, the former Cabinet Secretary of the union government, was constituted. That committee submitted a 230-page report on 27 May 2016. The MHRD was supposed to put this report for 'public views' and evaluate it. But instead of inviting the suggestions on the unabridged report, the MHRD came out with a 43 Page document 'Some Inputs for the Draft National Education Policy 2016' in July 2016 and sought suggestions from the common people. Still, many well-

meaning people and organisations including AIDS0 (through e-mail on 26 September 2016) submitted suggestions on the document and urged upon the government to adopt a democratic process for the formulation of a new 'National Education Policy'. But the government turned a deaf ear to all the appeals and formed a 11 member committee led by Dr K. Kasturirangan, the former chairman of Indian Space Research Organisation (ISRO) to draft the new 'National Education Policy' and continued to follow the same process.

So now, the claim of the MHRD - 'some lakhs of meetings were held at different levels' has raised serious doubts regarding its intentions. Naturally, common people have raised questions: 'How many of these, have people at respective levels come to know of, let alone have seen or taken part in? What were the proceedings or outcomes of those?' These questions have remained unanswered as the reason is most obvious.

Implementing Hidden Agenda

The MHRD under the smokescreen of democratic gestures, in reality, tried to implement its hidden agenda through its ministers or pliants or stooge organisations-individuals-bureaucrats. Contextually, we would like to mention that though time and again, on behalf of AIDS0, we approached the committee to have an interaction with us, they couldn't find any time. Even our submissions or memorandums were not recognised. A number of organisations or individuals had been experiencing this same thing also. On the other hand, the drafting committee enlisted only the name of Akhil Bharatiya Vidyarthi Parishad (ABVP) as a students' organisation amongst the organisations with which the drafting committee or any member of it had met and interacted just because of the fact that the ABVP belongs to Sangh Parivar. Further, when the 'Draft National Education Policy 2019' is a proposed draft only, the central government's enthusiasm to implement its recommendations e.g. in the last budget session on 5 July 2019, the Hon'ble Finance Minister's declaration to form National Research Foundation or similar provisions in the NMC Bill 2019 passed in the parliament recently, has unmasked its undemocratic fascist attitude towards education. Needless to say, seeking comments and suggestions from the public on the said draft is nothing but an eye-wash.

On Basic Approach towards Education

It's a well-known fact that the concept of 'secularism' that had evolved during the period of Renaissance and bourgeois

democratic revolution for overthrow of feudal social system emphasizes the mundane; that religion will be considered as strictly a matter of personal belief and the state, government and system of education shall be totally free from any religious belief, custom or practice. But due to the inevitable fallout of the inherent limitation of the freedom struggle of India in the reactionary phase of capitalism-imperialism, the concept of 'secularism' in our country has been defined, in a peculiar way, as equal emphasis to all religions. The governments pointing at the sharp degeneration of values within the society had equated the lofty secular humanist values with the religious values and continuously have been trying to inject the religious or spiritual contents in the system of education thereby providing a breeding ground to the communal, casteist, parochial and other divisive forces. This Draft NEP 2019 is no exception to that design.

Relegating the Secular-Humanist Values

When the modern Indian nation was emerging, the educationists and eminent personalities, who also fought for the country to achieve independence, dreamt of a democratic education system enriched with renaissance thoughts to build up worthy future generations of for that sovereign independent country. This concept of modern education i.e. scientific-secular-democratic education including modern science, secular humanist thoughts, concepts of democracy, concept of equality of man and woman, and such others was introduced and developed (to whatever extent, it may be) in the Indian sub-continent in the eighteenth century i.e. in British-India. It started with Ram Mohan and became full-blown with Vidyasagar. But the Draft 2019 notes that the 'rich legacy to world heritage' which will be 'enhanced and put to new use through the education system' is the 'education in India was only enriched through the mixing of cultures that arose from the very first invasions, till the arrival of the British'. [Drawing from India's heritage, Page 26] In this way, it tries to side-line the contents of democratic education which was dreamt of by the great renaissance personalities and greatmen of Indian freedom struggle.

That's why, while the Draft NEP 2019 recommends to teach even the life of Bharat Ratna awardees [4.6.8.7] to the students to inspire them, it deliberately ignores the life and struggle of the martyrs and fighters of the uncompromising line of the freedom movement of India including Netaji Subhash Chandra Bose, Shaheed Bhagat Singh, Khudiram Bose and great renaissance personalities such as Raja Ram Mohan Roy, Ishwar-

chandra Vidyasagar, Jyotirao Phule and the likes, only to insulate the students from the democratic and secular humanist values. **In our considered opinion, it's a culpable offence on the part of the drafting committee.**

Even, when the Draft NEP 2019 mentions about the 'Development of Constitutional values', [4.6.8.3] it deliberately omits the 'Secular Humanist Values' which goes against the very preamble of our constitution as 'Secular' is a vital tenet of it. Again, in the name of incorporating the ethical, moral principles and values, the Draft NEP 2019 hatched a ploy to infuse 'Hindu religion' oriented practices among the students in the name of so-called traditional Indian values i.e. seva, ahimsa, swacchata, satya, nishkam karma [4.6.8.2] Here we want to mention that 'democratic values' were developed with the assimilation of all the socially useful values of religion and yet it brought many new concepts i.e. equality, liberty, fraternity and freedom of women etc. for the betterment of human civilisation. To teach the students about the religious values is a calculated move to ignore the lofty ideals of the 'democratic values' and thereby paves the way to foster religious jingoism in a multi-religious country like India.

Control to Religious Bigots

On the other hand, the Draft NEP 2019 holds that 'several philanthropic organisations and foundations as well as many other cultural, faith-based and community organisations from the Hindu, Muslim, Buddhist and Sikh communities, the Christian Missionary groups, Jain sects, and so on stand out in the large numbers of early institutions they started, many of which are still some of the leading educational institutions in the country today. [Page 34] The Draft NEP 2019 also specifies that 'Hindu Mutts and Ashrams, Christian Missionary Institutions, Islamic trusts, Buddhist and Jain community initiatives, Gurudwaras, etc. have contributed to various educational initiatives throughout our history.' [A1.3.4.2] And then it proposes that the 'existing traditional or religious schools, such as madrasas, maktabas, gurukuls, path-shalas, and religious schools from the Hindu, Sikh, Jain, Buddhist and other traditions may be encouraged to preserve their traditions' [P6.5.2] to impart religious education. Thus, the Draft NEP 2019 strives to provide religion-oriented education and tries to teach the obsolete medieval values to the future generation on one hand and creates the scope for Sangh Parivar to have a total control over education on the other.

Besides, instead of advocating for the government-run schools, the Draft NEP 2019 has pronounced that 'Private philanthropic schools ... be encouraged and not stifled by treating them with suspicion.' It also has made provision that 'private operators who try to run schools as commercial enterprises, vitiating the basic public good nature of education, will be stopped.' [Page 189] Contextually, it can be mentioned that during the period of renaissance and freedom struggle of India, the philanthropic approach was the guiding force for the opening of the schools. But Now-a-days, almost all private schools have become commercialised. So, fully government-funded schools should be opened up and existing schools should be provided adequate infrastructure, teaching staff and other amenities to facilitate the education for all. But through the provision of 'School Complexes' in reality, the Draft NEP 2019 will expedite the closure and merger of the government-run schools. Needless to say, the Sangh Parivar will get upper hand to run their schools.

Nalanda and Takshashila

The Draft NEP 2019 talks about the glory of 2 universities i.e. Nalanda (427 AD - 1197 AD) and Takshashila (600BC - 500AD) of the ancient Indian sub-continent. It is no matter of dispute that the highly formalised methods of Jain and Buddhist learning helped inspiring the establishment of these teaching institutions. But the Draft NEP 2019 cunningly glorifies Hindu religion oriented education of these universities putting aside the Jain and Buddhist teaching-learning tradition. Again unfettered development of these universities took place till they remained independent of the interference of the state. But they gradually declined due to the monitoring of the state. But to the utter surprise, while talking about the glory of these universities, the Draft NEP 2019 proposes for close monitoring by the state in the interest of the monopoly capital. Thus in the name of bringing back the education model of the ancient Indian universities of Nalanda and Takshashila [P9.1] it tries to impose Hindu religion oriented education and at the same time, it tries to rob the universities of their democratic ethos for accelerating the commercialisation of Education.

Mask of Knowledge of India

In the name of teaching the students about the 'Knowledge of India' [4.6.9] and incorporating Indian knowledge system into the curriculum [4.6.9.1] a conspiracy is hatched through the Draft NEP 2019 to cripple the students of our country. We

know, the Knowledge, hitherto achieved, is the product of the struggle of entire mankind, and not of any particular country or individual. It's true that as a part of this struggle, many inventions and discoveries were made in ancient India. Objectively it should be established before the world community in proper forums and then it should be incorporated into the curriculum. Otherwise, on the one hand, the contributions of our great predecessors will be undermined and the search for the truth will be neglected by the young children of our country on the other.

Similarly, the Draft NEP 2019 has suggested to teach the students the powers of 10 as used in Vedic System such as 100 crore = 1 arab, 100 arab = 1 kharab, 100 kharab = Neel, 100 Neel = 1 Padma, 100 padma = 1 Shankh, 100 Shankh = 1 Mahasankh etc., so that they can understand and speak about larger numbers early on and throughout their lives. [4.6.5] We think, this is mere jingoism. Because, we should teach the students to use the power of 10 according to the international standard not according to the standards used in the ancient period. Otherwise, it will hinder their growth.

Further, the Draft NEP 2019, suggests to teach core values and socio-emotional skills to the children through Panchatantra, Jataka, Hitopadesh, and other fun fables and inspiring tales from the Indian tradition [4.6.8.7], it deliberately ignores the beautiful stories of Arabian Nights, Greek Stories or Aesop's Fables etc. thereby depriving the students of the collage of beautiful tradition of the world.

The Draft NEP 2019 also suggests that every student from the Foundational stage onwards will have basic exposure to Indian Music and Art [4.6.2.1] Firstly, it ignores the science of music and art by giving emphasis on the Indian music only. Because music and art cannot be confined to the geographical boundary, nor can it be taught in an unscientific process. Secondly, it tries to make music and art compulsory for all students thereby imposing a burden on them. We think, it should be a matter of choice of the students to learn music and art. Moreover, in the name of preserving the local artistic traditions and cultural heritage, the students should not be taught Indian art and music only. If they are interested, they should be taught a wide range of music and art according to their interest be it eastern or western and in a scientific process.

Change of Textbooks

Accordingly, the Draft NEP 2019 advocates for the change of textbooks, and NCERT to concentrate on shrinking the

curriculum. And at the same time it also says that 'Textbooks will aim to contain only correct, relevant material; when unproven hypotheses or guesses are included, this will be explicitly stated. [Page 102] All textbooks will aim to have a national and Indian flavor, as well as a local flavor where possible/desirable. [P4.8.3] This is quite ridiculous. Any rational person knows that the textbooks must contain only verified truths. And the truth has no local flavour, rather it is universal. But the Draft NEP 2019 makes space for unproven guesses and with Indian flavour. Already anti-science propaganda is being orchestrated in our country by the members of Sangh Parivar including even the Prime Minister and his cohorts. If the policy is implemented then anti-science texts with so-called Indian flavour will be taught in the schools. This will destroy the rational thought process of young minds and create fanatic mind with regimented thoughts instead of scientific temper and rational mind.

In short, through a conspiratorial move, instead of imparting scientific education, the Draft NEP 2019 tries to inflict the fanatic Hindu culture on the students masquerading as the Indian tradition which will communalise the curriculum and thereby provide a breeding ground to the communal, casteist, parochial and other divisive forces.

Thus, on the pretext of viewing curricular integration of essential subjects and skills from Indian perspective, the Draft NEP 2019 in reality, has attempted to mould the curriculum in the communal line of the Sangh Parivar and thereby tries to create communal division in society. Hence, the content as prescribed by the Draft NEP 2019 should have no place in the curriculum and the curriculum be developed in the line of democratic-secular values and collage of world traditions.

On 5+3+3+4 Pattern of School Education

As per the present 10+2 pattern of school education system, though the various levels were further divided into Elementary (8) [Primary Schools (4/5), Upper Primary/Middle Schools (4/3)], High Schools/Secondary schools (2) and Senior Secondary/ Junior Colleges (2) depending upon different states, pupils were taught a homogenous course based on 6 or 7 basic subjects from class 1 to 10. And only after that, there was a differentiation in the streams into Arts, Science, Commerce and Diploma/ Polytechnique/ ITI or other vocational/ professional courses of 2/3 years of duration.

To the utter surprise of the saner section of the people of our country, the drafting committee neither explained the problems of this present system nor described the advantage of the new system over the old. But in place of the present 10+2 pattern for school education, the Draft NEP 2019 suggest for the 5+3+3+4 pattern for school education, i.e. Five years of the Foundational Stage: 3 years of pre-primary school and Grades 1 & 2; Three years of the Preparatory (or Latter Primary) Stage: Grades 3 to 5; Three years of the Middle (or Upper Primary) Stage: Grades 6 to 8; And Four years of the High (or Secondary) Stage: Grades 9 to 12. [P4.1.1]

However, according to the new pattern as suggested by the Draft NEP 2019, the foundational stage will comprise of 'flexible, multilevel, play-based, activity-based, and discovery-based learning'. [Page 75] Needless to say, **intermixing the pre-school activities with grade 1 & 2 will destroy the formal education of the latter.**

Later primary stage (grades 3 to 5) as per the design of the Draft NEP 2019 will be building on foundational style and 'gradually beginning to incorporate textbooks as well as aspects of more formal classroom learning.' [Page 75] So, the **education will become a mockery up to grade V** as the formal subject teaching-learning will be started from grade 6.

Middle stage (grades 6 to 8) will see the 'introduction of the subject teachers for learning/discussion of the more abstract concepts in each subject that students will be ready for at this stage across the sciences, mathematics, arts, social sciences, and humanities.' [Page 75] Thus, the **10 years of the basic teaching of present system will be reduced to only 3 years of subject teaching virtually. This will result in a very weak foundation for a student and in the face of existing 'No Detention Policy', this system will destroy the teaching-learning process absolutely.** It will compel the guardians to choose private schools for their children. Eventually, it will complete the ongoing process of the commercialisation of education.

Semester System in Secondary Stage

One of the main intention of the Draft NEP 2019 for advocating 5+3+3+4 pattern in school education is the introduction of semester pattern in secondary stage (grades 9 to 12) abolishing 10th & 12th board exams. The Draft NEP 2019 proposes that 'each year of the Secondary Stage will be divided into 2 semesters, for a total of 8 semesters.' [P4.1.1] As a suggested model, each student over the duration of secondary school

would be required to take at least two semester Board Examinations in mathematics, two in science, one in Indian history, one in world history, one in knowledge of contemporary India, one in ethics and philosophy, one in economics, one in business/commerce, one in digital literacy/computational thinking, one in art, one in physical education, and two in vocational subjects. In addition, each student would be required to take three basic language Board Examinations that assess basic proficiency in the three-language formula, and at least one additional Board Examination in a language of India at the literature level. Additional Board Examinations in various other subjects, including more advanced subjects in mathematics, statistics, science, computer programming, history, art, language, and vocational subjects, will be available. Students will be expected to take a total of at least 24 subject Board Examinations, or on average three a semester, and these examinations would be in lieu of in school final examinations. [P4.9.5] Also the 'students will be taking 40+ semester courses during secondary school' [P4.9.5] i.e. on average 5 to 6 a semester.

Naturally, the question arises that is it possible for a student of 14 – 18 age group to learn '40+ semester courses on an average of 5-6 a semester' with 'at least 24 subject Board Examinations, or on average three a semester'? What will he learn during this period? Needless to say, students of the country will be deprived of the minimum understanding of a subject let alone comprehensive knowledge. Moreover, as per the Draft NEP 2019, the 'students should be able to choose many of the subjects in which they take Board Examinations, depending on their individualised interests' [Page 106] which will transform the board examinations into a farce. Now, in spite of all attempts of remedial action, if any student still lags behind, will he/ she be detained and asked to repeat the course? The Draft NEP 2019 has the simple answer to i.e. nobody will be able to keep backlog! Because it suggested that 'Board Examinations must also be made "easier"...any student who has been going to and making a basic effort in a school class should be able to pass the corresponding subject Board Examination without much additional effort.' Thus it is a criminal offence as it ignores the devastating effect of 'No detention Policy' up to class VIII and tries to extend it up to class XII. Simply it will leave the higher secondary students in a hapless condition. Because, the students will remain unprepared for the tough competitive examinations for securing a job or getting entry into a premier institution of higher education.

National Testing Agency

Further, instead of these board examinations, the Draft NEP 2019 endorses for 'modular entrance examinations' by National Testing Agency (NTA) for admission into universities. Contextually, it can be mentioned that the Draft NEP 2019 envisages this policy to fight out the 'negative effects of the current Board Examination system' which are also seen in the 'university entrance examinations' or 'corresponding harmful coaching culture'. But will not this system become a boon for the private coaching industries? This system advanced by the Draft NEP 2019 not only will boost the private coaching centres, but also will help the fascistic centralisation of the school curriculum. There is also an apprehension that the increased mobility of the students with NTA scores will accelerate commercialisation of education and create hindrance for the common students to get higher education.

Detrimental to Comprehensive Knowledge

We know, it is very important to study the subjects in a comprehensive and holistic manner for proper inculcation of knowledge. Even in a subject, one topic is connected with other. So it is considered very important that different chapters are studied part by part, then after one or two years a thorough revision of the entire course considering all components of the course together, in view of the final examination, might help to develop a comprehensive understanding of the course. In the semester system, the courses are divided into small packages or modules. After examination of each semester when the course of that semester is dropped, students may forget whatever they learnt in earlier semesters and never approach the course in a holistic manner. It will be easier for the students in procuring more marks/ higher grades or getting passed in the examinations but learning will suffer very seriously. Neither will a student get the minimum time to make adjustments with a new subject nor will he earn mastery over any subject. Rather he will learn nothing at the school level. Secondly, burdened with the examinations, students will not get any scope for co-curricular and extra-curricular activities which is detrimental to the development of their finer qualities.

Thirdly, in a situation of acute shortage of teaching staff, it's very difficult to manage time for question setting over a wide range of subjects, conducting examination, proper evaluation and timely result publication twice a year. We know that due to its unsuccessful implementation, the semester system in

graduate and/or post-graduate level has been rolled back in Gujarat, Madhya Pradesh, Haryana and Himachal Pradesh. In this situation, it is disgraceful that the Draft NEP 2019 is suggesting for the introduction of semester system from secondary level i.e. from class IX to class XII. What is the real motive behind such a recommendation in schools? Simply to destroy the process of inculcating comprehensive knowledge.

Hence, according to our considered opinion, the 5+3+3+4 system should be scrapped and idea of semester system in school education up to higher secondary stage should be revoked as well. Rather present 10+2 pattern of school education be continued with annual examinations in all classes starting from class 1 and board examinations in class X and XII. Moreover, the score in these board examinations should be the yardstick to get admission into higher classes.

On Early Childhood Care and Education

In addition to the above, the Draft NEP 2019 views the 'Early Childhood Care and Education' (ECCE) as a part of the Foundational stage of school education' [Page 28]. According to the draft the 'quality ECCE includes not only the health and nutrition of both the mother and the child, but also crucially includes cognitive and emotional stimulation of the infant.' [Page 46]

We also have been demanding for early childhood care for the children since long. But how will it be materialised? For the nutrition of child let alone the condition of mother, the Draft NEP 2019 only suggested for a breakfast in addition to the mid-day meal in the schools although its feasibility depends upon the adequate funds allocation. Is it enough for the development of a child as the Draft itself says that 85% development of a child occurs before age six? As per the Global Hunger Index (GHI-2018) which is estimating hunger for the children under 5 years of age, India ranks 103 among 119 countries. Is there any concrete plan to mitigate the hunger? The answer is negative. Then what would be the fate of the child after his return to home, when more than 78% people are living below the poverty line according to 'a poverty line of Rs 20 per capita expenditure per day' fixed by Mr Arjun Sengupta Committee? Such ECCE may seem to be attractive, but without developing the proper system to eradicate poverty, it is not feasible.

Again, for the cognitive development of the child the Draft NEP 2019 suggest: to strengthen Anganwadis; co-locating

Anganwadis with primary schools; co-locating pre-schools with primary schools where possible; building stand-alone pre-schools. [Page 50] First of all, the primary schools are on the verge of closure and merger as a fallout of the policy of the government. In this situation, the feasibility of the stand-alone pre-schools or co-locating pre-schools with primary schools or Anganwadis is nothing but a camouflage to deceive the countrymen. There is also an apprehension that it may lead to the closure of Anganwadis.

Secondly, the activities of the Anganwadis and those of the schools are different. The Anganwadi centres are used as basic healthcare providers including nutrition, vaccination, and rehydration and also function as the centre for survey, distribution of governmental aids and even electoral cards. There are no permanent appointments or infrastructures. Anganwadi workers with a very negligible remuneration are working in those centres. Anganwadi workers are fighting hard to wrest their legitimate dues and proper recognition from the governments. In this situation, is it feasible to materialise this policy only by imposing the responsibilities on them further or just giving lip service to strengthen Anganwadis?

It is pertinent to note that presently well-to-do families are sending their kids to the playschools and it's an optional one. But when three years of pre-primary education will be included in the formal education, it would be imperative for the guardians to teach their children. In the wretched condition of the Anganwadis, it is taken for granted that they will not opt for that. So, we are apprehending that in the name of 'Childhood Care and Education', there is a conspiracy to provide an opportunity to the private bidders to run such centres.

Hence, the Government should devise the methods to take care of every minute details of all the children of the country from their birth including their dress, food, shelter, health and education.

Further, the Anganwadis should be kept separate. And Anganwadi Centres should be developed into 'Day-care Centres' with permanent and adequate infrastructures, satisfactory measures for cleanness and safety, and permanent trained staff to take care of the children with the assignment of pre-school childcare only.

On Right to Education

The Draft NEP 2019 admits that 'despite progress in some aspects, a mind-numbing uniformity prevails in the education

system today, one in which students are not nurtured for their individual potential [Page 27] So, it suggested to review the RTE Act, 2009 and incorporate the improvements [Page 179]. It gave stress upon mainly three aspects as follows:

No Detention Policy

Firstly, the Draft NEP 2019 couldn't suggest to scrap 'no detention policy', rather it suggested 'to review the recent amendments to the RTE Act on continuous and comprehensive evaluation and the no detention policy'. [Page 195] Right of Children to Free and Compulsory Education Act, 2009 (RTE Act, 2009) which came into force in April 2010 has the provision that every child within the age group of six to fourteen years shall have the right to get free and compulsory education in a neighbouring school till the completion of elementary education. But in the name of checking drop-outs, it abolished pass-fail system from class 1 to 8 providing some lame excuses. Sensing the disastrous effect, the only fighting students' organisation of the country, AIDSOS has been launching a series of movements across the country since the very day of its implementation. People from all walks of life have supported this movement. Due to public pressure, all the committees constituted by the central government opined in favour of reintroduction of pass-fail system. Even 23 states gave positive opinion. But the BJP-led central government deliberately played about and didn't implement it. Ultimately to pacify the mounting pressure, an amendment passed in July 2018, of course, mandates conducting the regular examination in class V and class VIII at the end of every academic year. In case, a child fails in class V or VIII examinations, he/she will be given an additional chance for a re-examination. If that child fails again in re-examination, he may be held back in class V or VIII, or in both classes. But, the responsibility of its implementation is rests with the state governments though this was not the procedure for its abolition.

However, this system brought down the quality of education in the government-run schools and the standard of the students deteriorated sharply. [Vide ASER (Annual Status for Education) Report] It couldn't check drop-outs in elementary level, rather became a cause of increased drop-outs in the secondary schools. As an inevitable fallout, the guardians were compelled to choose private schools for the well-being of their children and student strength of government schools reduced further. Now, the government has resorted to close down the

schools with a low number of students and hand over the infrastructure of those schools to the private entrepreneurs. So, it's very much clear that the government by hoodwinking the people of India very cunningly wanted to privatize elementary school education. And now, suggesting the review of recent amendments, the Draft NEP 2019 is intended to implement the 'no detention' policy, as it has recommended for State Census Examination, [Page 107] the assessment in class III, V & VIII to track the students' progress only.

Clause 12(1) (C)

Secondly, the Draft NEP 2019 proposed to review the clause 12 (1) (C) of RTE Act, 2009 pertaining to the admission of 25% students of weaker sections in specified category of schools and private schools. [Page 193 – 194] Because it observed that 'schools through measures such as those in the RTE Act 12(1)© have not worked nearly as effectively as had been hoped.' [Page 191] The Draft NEP 2009 suggested either to scrap this clause or to implement it according to the manner prescribed by it.

Contextually, it may be mentioned that through the RTE Act, 2009 the government legalised the establishment of the private schools. But to deceive the common people, it made the aforesaid provision. According to the law, the government will bear the expenditure of the students admitted under this scheme. But the government didn't provide the assured funds to Kendriya Vidyalayas and other specified categories of government-run schools leading to the failure of the scheme. On the other hand, private schools which received only a meagre amount of funds treated those students with discrimination, though some private schools were benefited from public exchequer with fake enrolment statistics. Now, the Draft NEP 2019 prescribing some complicated measures in the name of the implementation of the clause, in reality, is intended to scrap the clause 12(1) (C) to benefit the private entities.

Religious Schools in BOAs

Thirdly, the Draft NEP 2019 recommended that the 'schools such as gurukulas, madrasas, pathshalas, home schools, alternative schools, etc. will be allowed and enabled to deliver a quality education and participate in the education system including Board of Assessments.' [Page 195] It seems that ensuring participation of these schools in the decision making will help Sangh Parivar to inflict its ideas on the school system. Besides, these schools and their managements will be benefited

from the public exchequer, gradually leading to the death of government-run schools.

Extension of RTE

Now, the Draft NEP 2019 has suggested that 'the right to free and compulsory education as guaranteed by the RTE Act will be extended downwards to include up to three years of early childhood education prior to Grade 1, and upwards to include Grades 11 and 12.' [Page 193] Through the above discussion, we would like to point out that the RTE Act, 2009, in reality, snatched the right of a student to get educated. It will spell worse disaster if extended and privatise-commercialise the education from pre-primary through grade 12 further as it will tell upon the standard of education.

Hence, we do have the strong opinion that RTE Act, 2009 either be amended or a fresh act be enacted to provide education for all in true sense of the term.

It should incorporate the provision to re-introduce pass-fail system from class 1 with board examinations in class X & XII. Also the provisions with regard to teaching staff appointment, infrastructure development, providing teaching-learning equipment to library facility be implemented in letter and spirit.

On Language Policy

Apart from being a medium of communication, language as the vehicle of thought has a direct bearing as the mediator in all cognitive and social capacities, including in knowledge acquisition and production. Hence, the issues regarding teaching-learning of language are most fundamental to education. One may learn a number of languages on his own interest. But in general, the number of languages to be taught to a student should be reduced to the minimum.

Two-language Formula

In India, it is accepted by all and the government is committed to it that in the interest of both quality and quantity, education at all stages from lowest to highest be imparted in the mother tongue of the taught. Again, all intra-state official work including the work of the courts up to the High Court should be done in the mother-tongue of the people of the state concerned for the democratisation of society.

In these two cases, mother-tongue will serve the purpose. And all governments are committed to it at least in the paper. Now, since the people of different states will have their

respective mother tongues as the medium of instruction up to the highest level, there will remain the necessity of a common medium of communication between them in the sphere of higher thought. While deciding this link language, the point for consideration is not the percentage of the people speaking the language, rather the language that will solve the crisis should be considered. In this context, English will solve the problem because it is the window to world knowledge and historically emerged as a link language in our country.

Hence, we have been recommending for a two-language formula i.e. teaching Mother Tongue and English in all stages of education and also strongly opining for using mother tongue as the medium of instruction.

Why Three-language Formula?

But since 1960s, though all the governments opined for the mother tongue as the medium of instruction, they are trying to impose 'Hindi' upon non-Hindi speaking people through the three-language formula i.e. Hindi (Mother Tongue) + English + one of modern India languages for Hindi speaking states and Mother Tongue + English + Hindi for non-Hindi Speaking states to safeguard the interest of the capitalists of our country. But due to the protest from different quarters, the central government made a provision that students of non-Hindi Speaking states may choose one of the modern India languages in place of 'Hindi'. Although different states are following the modified formula, we have been strongly opposing the three-language formula with the view that there is no need to burden the curriculum of a school student with an extra language learning.

It is pertinent to note that two-language formula is reflected in the courses of CBSE, ICSE boards, though a student can learn 3rd language as an optional subject. As for the instance, in CBSE syllabus compulsory language includes: Language-I [Hindi Course A or Hindi Course B or English Language & Literature] and Language - II [Any one Modern India languages including Hindi and English, other than Language chosen at Language –I] In ICSE Syllabus compulsory language includes: Language-I [English] and Language II [Indian Languages or Modern Foreign Languages]. Above system also found in some state boards including Haryana, Madhya Pradesh, Delhi and Uttar Pradesh, although government has been trying to implement three-language policy through a systematic planning and English is being replaced by Sanskrit/Hindi.

Though the Draft NEP 2019 upholds that young children become literate in (as a language) and learn best through (as a medium of instruction) their “local language” i.e. the language spoken at home, it advocates to implement the three-language formula following the footprints of its predecessors. But endorsing the design of the Sangh Parivar- one nation, one religion and one language i.e. Hindi-Hindu-Hindustan, the drafting committee of NEP 2019 tried to impose Hindi upon non-Hindi Speaking people empath-etically. Pressurised by the protest movement of the common people, particularly the people of southern states, the central government spelt out that 'Hindi' would be optional again. Now, as per the Draft NEP 2019, three-language formula that burdens the students with one more language learning will continue as before which has a seed of divisiveness and fascistic centralisation.

English Vs Sanskrit

Moreover, while the Draft NEP 2019 with a crippled outlook tries to side-line the English teaching, it encourages the teaching of non-commu-nicative language i.e. 'Sanskrit'. Since long, the saner section of the people of India have been of the opinion that Sanskrit may be studied as a separate subject on optional basis in higher classes or one can conduct research on it. But it should not be included in the general course because it is no longer a communicative medium in any part of the country. However, the Draft NEP 2019 is shamefully advocating for the teaching of Sanskrit just to satisfy the Sangh Parivar.

The Draft NEP 2019 blames English as a foreign language but it fails to note that a very considerable section of Anglo-Indians speak English and it has become a part of our language family historically. The committee is so passionate to malign English teaching that they committed a series of mistakes. Even, self-contradictory statements galore in the document. At one place it says: 'Logically speaking, of course, English has no advantage over other languages in expressing thoughts.' [P4.5.4] But it admits: 'textbooks (especially science textbooks) written in India's vernaculars at the current time are generally not nearly of the same quality as those written in English.' [4.5] Again it says 'English has not become the international language that it was expected to become back in the 1960s.' [Page 82] But it turned around to accept that English has become an international common language in certain realms such as science and technology research, e.g. most high level scientific journals around the world at the current time publish predomi-

nantly in English.' The Draft NEP 2019 opines that 'large sections of society based on language, keeping them out of higher-paying jobs and the higher socio-economic strata.' [Page 82] But instead of advocating for 'teaching English' to the students at the primary stage, it tries to shield the students from English teaching. But when the Draft NEP 2019 couldn't deny English teaching, it has given stress upon the 'fluency' and 'functionality' of 'English' instead of an in-depth study of the language. Thus, the Draft NEP 2019 hatched a conspiracy to deprive the millions of the opportunity to acquire real knowledge and livelihood.

Fun course

Besides, the Draft NEP 2019 advocates for a fun course on "The Languages of India" sometime in class VI to class VIII and also for a two-year relevant course on a classical language i.e. Tamil, Telugu, Kannada, Mala-yalam, and Odia, in addition to Pali, Persian, and Prakrit and study of Sanskrit and knowledge of its extensive literature, thereby imposing further burden on the students. Hence, it should be done away with. Again, the Draft NEP 2019 proposes a national institute for promoting Pali, Persian and Prakrit [page 386] instead of recommending steps for further development of the 'Central Institute of Indian Languages, Mysore'. Consequently attracting doubt over its intentions.

In this condition, we strongly feel that maintaining the mother tongue as the medium of instruction, a two-language formula i.e. mother tongue and English be adopted in the matter of learning languages in the schools and effective steps be taken to develop all modern Indian languages in the shortest possible time.

On Sex Education

The Draft NEP 2019 is so concerned (!) about ethics and morality and Indian ethos (!) that it prescribes sex education for students even in secondary schools [P4.6.8.5] It is not an isolated one. While the study of serious and very important subjects is being viewed by the policy-makers as 'burden', 'irrelevant', the governments are very much enthusiastic to impose on the adolescent students a new subject, sex education, which is being launched in different states in the name of 'Life Style Education', 'Adolescent Education', 'Adolescence Education Programme' (AEP) etc. In the name of combating the menace of AIDS and other sexually transmitted diseases, and sexual anarchy among adolescents and viewing human sexual-

ity as a mere biological instinct as in animal world, sex education is being imparted for the school children throughout the country. On the basis of recommendations made by the NCERT and international agencies like the World Bank, UNESCO, UNICEF etc., who are behind such ill-boding strategies, educational bodies and AIDS control societies of different states have enthusiastically joined the bandwagon on this so-called adolescent education programme.

It is true that during adolescence, curiosity regarding sex creates certain complications among teenagers. But human sex cannot be viewed in separation from human values, tastes, aesthetic sense and moral-ethical concepts i.e. the entire cultural ambit of the society as well as sense of social responsibility. A look at the curriculum, modules and manuals on adolescence education containing graphic description and crude examples prepared for classroom teaching will tell us that the attempt is nothing but an advocacy for practising free but safe sex. Not only that, the campaign that is going on in full swing all over the country with the avowed objective of creating awareness on AIDS and safe sex is a propaganda of bad taste and open encouragement of unethical sexual behaviours. The message behind the whole hog of this campaign unmistakably appears that one can have any type of sexual relation provided if he or she takes precautionary measures. This entire shameless exercise of the government may promote the business of certain companies but cannot prevent AIDS. Rather, these remedies will aggravate the disease as has been reported in America, Canada, Britain, Thailand etc. where such education was introduced long back.

In reality, problems of adolescence that are causing so much worry to parents and guardians, stemmed from a crisis in values and cannot be tackled through the introduction of sex education in schools. These have to be combated on a different plane by releasing a powerful current of social and cultural movements based on higher ethics and morality. Moreover, adolescents are to be treated individual-specific and the approach will vary from person to person. Open classroom is not the place for it, nor are the ill-equipped teachers fit for the job.

Presently, the biology subject of the high school curriculum deals sufficiently about human anatomy, reproductive system, and health and hygiene etc. There are lessons even on AIDS and its prevention. The children can also obtain the necessary infor-

mation in the best way from their parents and family. Elderly people in the families guided by high sense of values and enjoying the respect of society can in some situations do the job. Help may also be taken from the medical fraternity or psychological counsellors. Ignoring all these, governments are hell-bent on introducing sex education in lower classes, only to wreck the moral backbone of young generations and to create permissive culture among them so that they will fall victim to degraded sexual behaviours and cultural degeneration. Contextually, it can be mentioned that to add insult to injury, the governments are encouraging the spread of liquor, pornography, obscene literatures, movies and songs, instead of imposing a ban.

Hence, the recommendation of the Draft NEP 2019 to impart sex education in secondary schools should be revoked.

On Vocationalisation of Education

The Draft NEP 2019 says 'Vocational education ... must be fully integrated within the mainstream education so that all students are exposed to vocational education and have the choice to pursue specific streams of vocational education. ...The National Policy on Skills Development and Entrepreneurship (NPSDE) announced in 2015 specified that 25% of educational institutions would target offering vocational education. (Chapter 20, Page 359) Now the Draft NEP 2019 envisages that all academic institutions will be required to integrate vocational education into their educational offerings in a phased manner over a period of a decade. [20.1.1] The integration of vocational education into educational institutions will ensure that every student receives training in at least one vocation, and more if they are interested. The entire four-year period in secondary school, Grades 9-12, can be used to not just expose a student to different vocations but to help him/her to progressively build a considerable degree of expertise in his/her vocation of choice. (20.3) Vocational education at the undergraduate level will be expanded and targeted to offer enrolment to all interested learners (up to 50% of the total enrollment) by 2025, up from the present level of enrollment of well below 10%. [20.4.1]'

Vocationalisation of Education Vs Job Creation

Time and again different governments have tried to vocationalise the education system through different means i.e. Job-oriented education, teaching of relevant subjects, applied

courses etc. National Policy on Education-1986 tried to vocationalise education and now through the Draft NPE-2019 vocational education has been formally included as an all-pervasive measure, integrated with mainstream education. We know that many engineering graduates, diploma holders and ITI & Polytechnic pass-outs are unemployed. Because, the solution of unemployment does not depend upon the education, rather it depends upon the economic system. In this age of ever-growing unemployment in the country and acute recession of the capitalist economy of India as an inalienable part of the world capitalist economy, educated unemployed are the most disturbing headache for the capitalist rulers. So they always try to push and allure students more and more towards what they term vocational education, knowing full well that there is hardly any tangible and secured path open for any kind of vocation. Hence, Vocation-alisation of education will not generate employment.

Motive behind Vocationalisation of Education

Then what is the motive behind the vocationalisation of education? We think, the actual policy behind the vocationalisation of entire education is a concerted attack on the content of education. In the words of great Albert Einstein 'It is not enough to teach a man a specialty. Through it he may become a kind of useful machine but not a harmoniously developed personality. It is essential that the student acquire an understanding of and a lively feeling for values. He must acquire a vivid sense of the beautiful and of the morally good. Otherwise he - with his specialized knowledge - more closely resembles a well-trained dog than a harmoniously developed person.' So, to serve the interest of the ruling class, all the governments and their policymakers are trying for the vocationalisation of the entire education and the Draft NEP 2019 is no exception.

Does it mean that there should be no scope for vocational education? No, that is not the point. **We suggest that the Courses on vocational education attached to the recognised technological colleges should be there to cater to the local needs, if any, and the necessity of those who may require may go for that after a basic course, say after class X. But vocationalisation of entire education through the integration with the mainstream education should be stopped.**

On School Complexes

A standard teaching-learning needs sufficient numbers of well-trained and morally-ethically sound teachers, adequate

and safe infrastructure with fitting sanitation, clean drinking water and electricity, a suitable spacious environment, appropriate teaching aids including computer with internet connectivity, and proper nutrition. But these are not found in the government-run schools. Admitting these are essential, in a deceitful way, the Draft suggested for 'School Complexes'.

According to the Draft NEP 2019, schools will be re-organized into school complexes i.e. cluster of 10-20 public schools will be organised into one school complex 'to put an end to the isolation of small schools'. This will be the basic unit of governance and administration that will ensure availability of all resources - infrastructure, academic (e.g. libraries) and people (e.g. art and music teachers) along with a strong professional teacher community through combining the resources of the schools. Each school complex will have an SCMC comprising representatives from all the schools in the complex. The SCMC will be led by the headteacher/ principal of the secondary school in the complex and will have the headteachers/ principals of all schools within the complex as well as one teacher and a civil society member from the SMCs of each of the schools. [P7.5.3]

It does not need much intelligence to conclude that the school complexes will only lead to: (i) centralization of power into the hands of the power-that-be, including the head of complex or there may be conflict centring round the authority among the heads of the different schools (ii) closing of at least some of their member schools on the ground of viability or considering the typical politically charged situation even in villages, on the ground of being with a different political identity; (iii) further curtailment of the scope of education for quite a good number of particularly marginalized people.

Hence, no education-loving and democratic-minded person can support such a measure of school complex. Rather measures should be adopted to open adequate number of schools from primary to higher secondary level to cater to the need of the people and ensure that all the schools have the above mentioned facilities for imparting sound education.

On Four-Year Undergraduate Course

The Draft NEP 2019 suggests for the four-year undergraduate course with 'liberal education'. It says, 'The undergraduate degree will move towards a strong liberal education approach, regardless of subject, and be of either three- or four-year

duration.' [Page 237] Earlier, before 1970s, generally 14 years were required to complete undergraduate course from class 1 i.e. 10+2+2 or 11+1+2 or 11+3. Then the government surreptitiously introduced 15-year undergraduate courses in some states i.e. 11+2+2 or 11+1+3 or 12+3 or 10+2+3. Initially, the argument was that 'the students will have to undergo 14-year undergraduate course to be a graduate in pass course, but they will have to take 15-year undergraduate course to be a graduate in honours course.' And later, in the name of bringing uniformity, 15-Year undergraduate course was introduced across the country in mid-1970s. Now the Draft NEP 2019 has suggested for 16 years study from class 1 to complete graduation.

Again, it gives a deceptive argument that 'the three-year traditional B.A., B.Sc. as well as B.Voc. degrees will continue as well for those institutions that wish to continue such programmes, but all Bachelor's degrees will move towards taking a more comprehensive liberal education approach.' [Page 227] Needless to say, three-year undergraduate course will be automatically devalued and all institutions will be compelled to run four-year undergraduate course making it a 16-year course from class 1.

To ensure the acceptance of this course among the stakeholders, the Draft NEP 2019 suggested for two-year masters' programme for graduates who have completed 3-year undergraduate programme, one-year masters' programme for graduates with four-year liberal arts education or even an integrated five-year masters' programme. Then why a year was added to the undergraduate course? It is simply to curtail the scope for the youths to compete for jobs by one year further at the face of economic crisis and ever-increasing unemployment.

Moreover, it will work for the temporal expansion of the educational business. When the government is promoting the commercialisation of education systematically, to force the students to continue for an extra year is nothing but to drain more money from the students in form of different fees starting from admission fees to examination fees. But it would be difficult for the common students to afford the expensive higher education. So, the Draft NEP 2019 suggests for multiple exit with appropriate certification, e.g. an advanced diploma in a discipline or field (including vocational and professional areas) after completing two years of study or a diploma after completing one year. The three-year programme will lead to a Bachelor's degree while four-year programme will provide an opportunity to experience the full range of liberal arts education. [P11.5.1]

Besides, though the Draft NEP 2019 talks about giving more stress on the creative study and research work, it made a provision that 'Undertaking a PhD shall require either a Master's degree or a four-year Bachelor's degree. The MPhil programme shall be discontinued.' [Page 238] Thus it is out to destroy the detailed learning of a subject through the Masters' programme for those who will undertake PhD just after four-year under graduation. It will also put an end to the ambition of those students who couldn't pursue PhD to have a research experience and degree through M.Phil. programme.

Hence, the idea of four-year undergraduate course should be scrapped and the universities should continue with the three-year undergraduate course. Again the two-year masters' programme, one-year M.Phil. programme should continue in the present format.

On Liberal Arts Education

The Draft NEP 2019 proposes for liberal arts education for the undergraduate programmes to energise the institutions which 'enables one to truly develop both sides of the brain- both the creative and the analytical side'. What is Liberal Arts Education? As per the Draft NEP 2019, 'ancient books described education as knowledge of the 64 Kalas or arts, and among these 64 arts were included subjects such as singing, playing musical instruments, and painting, but also 'scientific fields' such as engineering, medicine, and mathematics. The notion of 'knowledge of many arts'- i.e. what is called 'liberal arts' in modern times - must be brought back to Indian education, as it is exactly the kind of education that will be required for the 21st century. [Page 208] It further says that 'liberal arts education of this kind is already being extensively implemented today e.g. in the United States in Ivy League schools [Eight schools comprising of Harvard University, Brown University, Columbia University, Cornell University, Dart-mouth College, University of Pennsylvania, Princeton University, and Yale University.] with great success.' [Page 224] So, the Draft NEP 2019 recommends for at least 5 such institutions and the liberal arts education in other institutions.

Let us have a bird's-eye view of core requirements for the Bachelor of Liberal Arts (ALB) degree from the Harvard University to get an idea about liberal arts education. According to the course structure, the Bachelor of Liberal Arts (ALB) degree requires one to complete 128 credits or 32 (4-credit each) courses. It accepts a maximum of 64 transfer credits that

means 64 credits must be completed at Harvard University. Students can take degree courses from any of the subject areas within a concentration and courses are divided in three concentrations: Science, Social Science and Humanities. In addition to your concentration, you have the option to declare a specific field of study e.g. business administration and management, computer science, economics, government, international relations, and psychology. One can also earn up to two minor subjects to complement his undergraduate degree.

We may note that in Harvard University, there are 1189 courses under the Bachelor of Liberal Arts. And a single course in this University fulfils multiple credit requirements. For example, a course i.e. World War II through Film and Literature [HIST | E-1890] fulfils Harvard instructor, upper-level course work, writing intensive, literature field, history minor, social science, and history field of study requirements 4 credit in each. For getting a degree in the Bachelor of Liberal Arts, one has to complete following credit requirements from such type of 32 courses: 32 credits in your concentration or field of study taken at Harvard; 4 quantitative reasoning (math) credits, taken at Harvard; 4 moral reasoning (ethics) credits, taken at Harvard; 12 writing-intensive credits, taken at Harvard; 52 credits taken with Harvard instructors; 60 credits of upper-level coursework; 8 foreign language credits; 8 expository writing credits [EXPO25 required EXPO 15 is an Option] ; and 24 credit distribution [8 in Science, 8 in Social Science and 8 in Humanities] From a range of subjects, one can select the courses according to his choice.

Also regarding examination and evaluation, both the systems- take home i.e. write in your home and return it on the next day and open i.e. sit and write in an examination hall are operational in the Harvard University.

Will this type of undergraduate course be useful in our country? This 'liberal arts education' is nothing but a continuation of the school system of education envisaged by the Draft NEP 2019. When the 'no detention policy' has let down the standard of education; when students wouldn't be able to get the opportunity to learn the basic subjects up to class 8; when the semester system in secondary schools will be destroying the inculcation of comprehensive knowledge; the liberal art education under the shadow of 'Ivy League' schools which is the enriched form of Choice Based Credit System (CBCS) would be the final nail in the coffin of education. Students in our country will not get the scope to acquire the comprehensive

knowledge in a subject at undergraduate level. Besides, 'Ivy League Schools' do not impart only degree in Liberal Arts (ALB). They are also imparting quality education in different subjects. On the other hand, the fees in the 'Ivy League Schools' is very high i.e. more than Rs. 25 lakh per student. In the name of starting new courses, if this type of fee structure is implemented, it will deprive many students of their right to get higher education. Moreover, the saner section of the people of our country are realising that shortage of teaching staff, unavailability of the infrastructure, library and laboratory, influence of nepotism in the evaluation of papers would be proved fatal for the implementation of this system of education, be it Indian or originated in a foreign land. Secondly, qualitative education system of 'Ivy League' schools is the product of the process continuing since early 16th-century. Copying such process and implement that in our institutions would be erroneous.

Hence, the idea of the 'liberal art education' and even the CBCS be dropped. The undergraduate students should be taught with a definite and yet uniform and scientific course pattern with the annual examination system.

On Higher Educational Institutions

As per the 'New institutional architecture for higher education' proposed by the Draft NEP 2019, 'all HEIs, by 2030, will develop into one of three types of institutions.' These three types of institutions are characterised as follows: Type I - Research Universities – which will dedicate themselves for cutting-edge research with highest quality teaching; Type II – Teaching Universities – meant for high quality teaching and contributing to cutting-edge research; Type III – Colleges - focus almost exclusively on the goal of high quality teaching. [Page 213 - 214] Further, it notes that Mission Nalanda will ensure that at least 100 Type I and 500 Type II institutes will be there by 2030 while Mission Takshashila will strive to establish at least one HEI in a district. [Page 221] It suggests a few privileged doing only research, a few more teaching with research and the rest, obviously the majority of HEIs will be colleges focussing only on teaching. So, this is blatantly discriminatory, instead of equal and homogeneous development of all the institutions. It will definitely curtail the scope for the teaching staff of Type II and III to conduct research work and also result in the drastic reduction of Ph.D seats. It will also tell upon the quality of the teaching.

Again, as per the system devised by the Draft NEP 2019, the Universities will have no affiliated colleges. [Page 220] This disaffiliation of colleges from the universities will also inevitably lead to lowering of the standard of education in matters pertaining to curriculum development, teaching, research and conduction of examinations. Corruption and nepotism will increase in these institutions. It will yield degree-holders, but without any real education. Rather there will be an unhealthy competition among the institutions to attract the students and the colleges will become certificate selling centres.

The colleges are allured with the provision of autonomy. [Page 213] But in reality, the 'autonomy' which is being talked about by this government is diametrically opposite to the idea of real autonomy. The pioneers of the idea of real autonomy categorically talked about the academic and administrative freedom of the institutions and said that the financial responsibility should be carried on completely by the government. But through distorting the concept of 'autonomy', the government is shirking its responsibility from providing fund and gradually trying to take control over every single affair of institutions. Moreover, for the smooth conduction of this anti-education recommendations, this Draft NEP 2019 also affirms that 'there will be no elected members to any of the bodies/structures within the HEI.' [Page 316] When this process of granting 'autonomy' to the colleges started in 1990s, AIDS0 opposed the policy and upheld that this policy would impose economic burden on the students, increase nepotism and corruption, and snatch the democratic rights of the teachers and the students. This formulation of AIDS0 has been proved correct. Now, this 'New institutional architecture for higher education' proposed by the Draft NEP 2019 will aggravate the problem further and accelerate the commercialisation of education.

Hence, all the institutions should be conferred with real autonomy i.e. financial responsibility should be borne by the government and other aspects of education should be left to the democratically elected bodies of the educationists.

Furthermore, all the institutions should be given the scope of research work along with the quality teaching as well. And the process of disaffiliation of the colleges from the universities should be stopped immediately.

On Accreditation of Institutions

The Draft NEP 2019 proposes compulsory accreditation for all the institutions from schools to universities in every 5

years. This accreditation process started with the establishment of National Assessment and Accreditation Council (NAAC) in 1994 following the recommendation of the National Policy on Education (NPE, 1986) and the subsequent Programme of Action (POA, 1992). According to the regulations, all higher education institutions who fail to comply with the assessment and accreditation clause will be barred from financial aid granted by the UGC or the Ministry of Human Resource Development. On the other hand, institutions with higher grade in the accreditation was endowed with higher amount of the financial aid. At that time, AIDSOP upheld that if accreditation is related with the assessment of the quality of teaching and infrastructure, then no institution should be deprived of the grant, rather weaker institutions need more attention and hence require more financial grant for their development. But the motive of the government was different. So, they turned a deaf year to the demand.

However, according to the criteria, institutions which have re-oriented their course and curriculum in tune with privatisation, commercialisation and the latest market trends are getting higher grades. Thus the UGC linked the issue of grants with the accreditation rating of the institution, and is using it as a tool to restructure the institutions according to the design engineered by the ruling capitalist class. As a consequence, in order to get better accreditation rating, the institutions are, on the one hand introducing more and more so-called 'innovative', i.e. market-oriented, costly self-financing courses and on the other hand are imposing huge amount of accreditation fees and development fees on the students, for window dressing of the institutions. Even steps like bribing to the accreditation team, temporarily hiring faculty staff or instruments in laboratories etc. for better accreditation have become regular practice. Just similar to gradation of hotels as five star or seven star etc., accreditation ratings are being used by the institutions to attract the students. Naturally, a better accredited institution means an institution with higher fees in the growing 'educational market' of our country. On the other hand, many institutions are suffering due to want of adequate financial grant.

Now, the Draft NEP 2019 is going to bring the schools under the process of the accreditation. To facilitate this process State School Regulatory Authority (SSRA) will be formed and that will be the sole regulator of the school education with responsibility also for oversight of the system and implementation of accreditation. As a result of which the condition of the

government-run schools will decline further in want of proper grants-in-aid.

Further, the Draft NEP 2019 becomes more hostile when it proposes Binary Accreditation- i.e. “Yes or No” accreditation in place of present Graded Accreditation. [Page 328] Needless to say, this process will deprive the institutions of the opportunity to receive any grant from the government. If it is implemented in the schools, then eventually many government-run schools will be closed providing a better space for the private entities.

Again, the Draft NEP 2019 recommends that 'the NAAC shall develop an ecosystem of multiple Accreditation Institutes (AI) and oversee the accreditation processes.' [Page 325] One AI may be required for every 100-200 HEIs. [Page 329] That means there will be 100 – 150 Accreditation Institutes to carry out the process of accreditation under NAAC. There will not be any problem for a person with a sound mind to understand that this process will lead to rampant corruption, nepotism and opening of sub-standard private institutions.

Hence, the process of accreditation of government-run institutions be stopped immediately. Rather all the institutions should get adequate financial aid for their development and due attention be given to the weaker or under-developed institutions with a proper assessment.

On Recruitment of Teachers

The Draft NEP 2019 has said that the 'minimal degree requirement for all permanent tenured teachers will be the four-year integrated B.Ed. degree'. [Page 127] It further described that 'the two-year B.Ed. will be intended only for those who have already obtained Bachelor's Degrees in other specialised subjects. These B.Ed. programmes may also be replaced by suitably adapted to one-year B.Ed. programmes for those who have completed the equivalent of four-year multidisciplinary Bachelor's Degrees or who have obtained a Master's degree in a specialty and wish to become a subject teacher in that specialty.' [Page 120] Presently, a person qualified with D.T.Ed/ D.El.Ed/ C.T after +2 is eligible to teach up to class 8 so far. There are lakhs of such trained teachers in our country. Now by bringing in new qualifications, this policy is going to drive those teachers into taking another course.

Further, the Draft NEP 2019 recommends that the 'B.Ed. degrees would be offered only by accredited multidisciplinary higher educational institutions offering four-year integrated

B.Ed. programmes.' [Page 120] It further suggests that the 'substandard stand-alone Teacher Education Institutions (TEIs) across the country will be shut down as soon as possible.' [Page 121] Needless to say, these higher educational institutions will charge high fees for this new course. It's evident from the parleys of the Draft NEP 2019 when it says that 'a large number of scholarships will be instituted for high-performing high school students, upon graduation from secondary school, to study at outstanding four-year integrated B.Ed. programmes at colleges and universities across the country.' [Page 121] Thus the Draft NEP 2019 is out to commercialise the teacher training course.

Now, though the Draft NEP 2019 admits that there are 10 lakh teaching posts lying vacant across the country, it prescribes an intricate process for the appointment of teaching staff in schools. It holds that after completing four-year integrated B.Ed. an aspirant should clear Teacher Eligibility Test (TET) supplemented by National Testing Agency (NTA) test scores in relevant subjects. It's not enough. Again, the aspirants would face an interview and a short 5-7 minute teaching demonstration in local Block Resource Centres (BRC). Naturally question arises that why such tedious process will be followed when all the institutes providing B.Ed. programme will be compulsorily accredited? Because, on one hand, the Draft NEP 2019 is trying to delay the permanent appointment of teaching staff on the plea of unavailability of the eligible teachers to destroy the teaching-learning process in government-run schools and on the other hand, attempting to induct the pro-administration candidates in the schools, i.e. the supporters of Sangh Parivar in the case in point.

NTP and RIAP

Furthermore, the Draft NEP 2019 proposes that 'a National Tutors Programme (NTP) will be instituted, where the best performers in each school will be drawn in the programme for up to five hours a week as tutors during the school for fellow (generally younger) students who need help. [Page 60] It also suggests that A Remedial Instructional Aides Programme (RIAP) will be instituted initially as a temporary 10-year project to draw instructors - especially women - from local communities to formally help students who have fallen behind and bring them back into the fold. [P2.6] Through these programmes, practically, the Draft NEP 2019 discourages the teachers' recruitment in schools.

Tenure Track Record

Though the Draft NEP 2019 maintains that 'all “para-teacher” (Shiksha-karmi, Shikshamitra, etc.) systems across the country will be stopped', [P5.1.8] it holds that 'under the tenure track systems, teachers will be on a three-year probationary/tenure track period followed by a performance-based confirmation which will be based on peer review, dedication and class room evaluation also. [Page 130] This may leave the teacher without confirmation and in many cases political influence, corruption and nepotism will affect the process and thus confirmation of appointment may evade the teachers for long periods.

Similarly, for the Higher Educational Institutions (HEIs), the Draft NEP 2019, holds that 'All matters pertaining to faculty, from number of faculty to be recruited to recruitment criteria and processes, to career progression, and compensation determination will be part of the Institutional Development Plan (IDP), and will be owned by the Board of Governors (BoG).' [Page 263] Thus it gives handle to local bodies where there may be the cases of corruption, nepotism and personal considerations in the appointment of the teaching staff in the HEIs. Further, the Draft NEP 2019 says that 'permanent employment (tenure) track system for faculty will be introduced for all college and university staff' and the probation period will typically be five years'. [P13.1.6] This will definitely tell upon the quality of education. Because a teacher in the university will have to prove his/her loyalty to the BoG in the probation period or he/she cannot get permanent otherwise.

Hence, we strongly opine that the teachers in the schools be appointed permanently based on their B.Ed. score [M.A (Education) course should be considered as an equivalent to the B.Ed.] and there should not be any TET or NTA test score or interviews for the purpose.

Further, teaching staff appointment in the HEIs should be done centrally at the state level on permanent basis.

On Open and Distance Learning

According to the Draft NEP 2019, the Open and distance learning (ODL) will be expanded, thus playing a significant role in increasing the Gross Enrolment Ratio to 50%. [Page 247] Measures such as online digital repository, funding for research, improved student services, credit-based recognition of Massive Open Online Courses (MOOC) etc. will be taken to ensure it is on par with the highest quality in-class programmes.

[12.3] When the quality of the formal education is deteriorating sharply due to the pro-corporate anti-education policies of the governments, who cares about the non-formal education? However, this non-formal system is being advocated primarily to provide an alternative scope for the deprived section instead of bringing them to the doors of the formal education system.

They are marketing the dreams only. It seems that the sky over the head of the entire population would be reeking in radio-waves and telewaves of different courses from literature to physics. The people will be asked only to pick up whatever they want to learn, whenever they get time and wherever they find the scope while travelling, taking rest or working. What they need is just some gadgets with internet connection. Even there are non-formal centres, internet cafes where instructors are there to help. Many well-informed people are being deceived by this campaign let alone common people.

But the policymakers are not expressing that education is not just gathering some information. Rather it is an act of remoulding, a process of transformation of a man. In the true sense of the term, involves a process of interaction between the teacher and the taught. This history of the present system of formal education will amply testify this. Man can be taught by a man, not by machines. Technological equipments, however sophisticated can help the teachers but not replace them. Secondly, due to this design of non-formal education, there will be no new educational institutions. Even if educational institutions are opened, there will be no appointment of teaching staff. This will have the serious bearing on the teaching-learning process and democratic education. By introducing this non-formal education, the government is practically disowning its responsibility to provide education to the people. This will aggravate further. After some days, the central government will be able to declare that it brought all into the ambit of education by just counting the sale of the electronic gadgets. Thus while gadget selling of the corporates and internet cafes or non-formal centres will increase, the people will be deprived of the real education. What more deception with the people could there be!

Hence, we strongly hold that the Open and distance learning (ODL) and Massive Open Online Courses (MOOC) may only supplement the formal education or it may be helpful for those who need some special training essential for their jobs. But it cannot be an alternative to formal education with direct teacher-student contact.

On Healthcare Education

As per the Draft NEP 2019, given the pluralistic health care legacy of the country, the different health systems such as Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homeopathy (AYUSH) will be mainstreamed under the pretext of Pluralistic healthcare education and delivery [16.8.2] We know that there has not been much research, if any, on the aforesaid health systems i.e. on AYUSH on the basis of modern scientific methodology of observation- experimentation- theorisation and verification thereupon, not in one laboratory or two, but universally. Hence, bringing these into mainstream will only adversely affect the healthcare delivery system.

Dilution of the Training of Doctors

It is also disgusting to see that instead of urging the government to ensure the recruitment of adequate number of MBBS/BDS Doctors, the Draft NEP 2019 recommends that 'Nurse Practitioners courses will be introduced and recognised throughout India so that nurses can compensate in part for the non-availability of doctors.' [16.8.4]

Secondly, it says that 'the diploma courses such as the one being offered by the College of Physicians and Surgeons, Mumbai, will be promoted throughout the country, to help produce sufficient number of intermediate specialists.' [16.8.7]

Thirdly, the Draft NEP 2019 recommended that new medical colleges and hospitals that have an adequate number of patients and well trained teaching faculty will be allowed to start postgraduate courses and district hospitals will move towards having a medical college attached to them. [16.8.7]

Further the Draft NEP 2019 proposes that the first year or two of the MBBS course will be designed as a common period for all science graduates after which they can take up MBBS, BDS, Nursing or other specialisations. It also proposes lateral entry to the MBBS course after completing a bridge course and thereby promoting 'bridging across the courses of different systems and disciplines'. [16.8.2] Contextually, it can be mentioned that identical to these recommendations of the Draft NEP 2019, the NMC Bill 2019 holds that the commission may grant limited licence to practice medicine at mid-level as Community Health Provider.

Who will stand guarantor of desired quality of these courses and who will take the responsibility of the well-being of the patients- the learned committee members or the government? These recommendations respectively, simply dilute the

training of the medical professionals and 'legalise Quackery' which will tell upon the healthcare delivery system.

National Exit Test

The Draft NEP 2019, alike the provisions in NMC Bill 2019, proposes for just one National Exit Test (NEXT) across the country i.e. the Final MBBS Examination which will work as licentiate examination, an entrance test for admission in post-graduate courses (16.8.3) and a screening test for foreign medical graduates. It is nothing but an evil design to 'auction medical seats to highest bidder' thereby make our entire Medical Education and Healthcare system a 'Global Commodity'. Needless to say, this examination will boost the private coaching industry and increase the cost of health education on one hand and exert unnecessary burden on the MBBS students on the other, thereby lowering the quality of the healthcare delivery system.

Bureaucratic NMC

The Draft NEP 2019 proposes that 'a medical education qualification framework to achieve this will be developed in conjunction with the National Medical Commission (NMC).' (16.8.2) According to NMC Bill 2019, this NMC is a completely bureaucratic body in which the majority of the members will be nominated by the central government and most of the members will be non-medico bureaucrats. In this body the state universities, medical colleges and state government will hardly have any representation and thus have no say regarding any policy matters. This highly centralised body is detrimental to autonomy of our universities, our federal structure and democratic functioning. So, the framework developed as per the NMC will definitely suit the corporatisation of medical education.

Besides, if at the suggestion of the Draft NEP 2019, private institutions are given free hand to fix their fee structure, [18.6.3] the existing law on restriction on increasing fee arbitrarily would be made null and void. Instead the private medical institutions will simply make merry, increasing fees for their courses on this or that pretext. It will be commercialization par excellence!

In this condition, the government should open more number of standard medical colleges and hospitals offering MBBS and BDS degree to cater to the need of the country. National Medical Commission (NMC) should be scrapped and healthcare education be supervised by a democratic

body of doctors completely free from governmental interference.

National Exit Test (NEXT) should be revoked. Further, the interface of different health systems i.e. Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homeopathy with modern medicine should not be facilitated without any scientific basis, instead research based on modern scientific methodology may be conducted on these systems.

On National Research Foundation

In the Draft NEP 2019, there is no separate policy for research as such, except an important new component, i.e. National Research Foundation (NRF). As envisaged by the draft NEP 2019, it will be constituted to catalyze and expand research and innovation in the country. According to the provision in the NEP-2019, NRF will work under Rashtriya Shiksha Aayog (RSA) and RSA will constitute its Governing Board. [14.1.4] Needless to say, it will directly work under the auspices of the central government. As a result of this bureaucratic constitution of NRF and its control by RSA, research proposals will be at the mercy of the political power at the centre and there will be no scope for the dissent whatsoever.

Benefit to Private Entities

Secondly, at the initial stage, the NRF was proposed to be given a public fund of Rs. 20,000/- crores (0.1% of GDP) and that may be revised every year, [14.1.3] and in addition to that, 0.4% of total public budget (centre + state) can be allotted for it [A1.4.8]. Again, it can draw additional funds from other sources also. NRF will sponsor the projects in Sciences; Technology; Social Sciences; and Arts and Humanities - with the provision to add additional divisions (e.g. health, agriculture, environmental issues), whenever it may be determined to be beneficial by the Governing Council of the NRF. [14.1.2] As per the Draft NEP 2019, along with NRF, all other research funding agencies like DST, DAE, DBT, ICAR, ICMR, and UGC etc. will continue to fund the research independently according to their priorities and needs. [14.1.10]

Contextually, we may note that due to unavailability of the funds, these organisations couldn't sponsor different vital projects in our country. Obviously, question arises that instead of strengthening these agencies what is the need of this new funding agency? Besides, according to the Draft NEP 2019, 'Researchers from all educational institutions, universities, colleges and schools, both public and private, as well as from

research institutions, will be eligible to compete for funding from the NRF.' Since the overall funding scenario won't change, nor also the state's general policies, there are reasons to apprehend that the source of other funding agencies will dry gradually. And eventually, the NRF will become the sole centre – of a semi-public semi-private nature – for funding India's research. It is crystal clear that with the framework set up for unfettered privatisation, it will end up siphoning off public money to corporates and projects of government-run institutes will suffer.

Research in Interest of Corporates

Thirdly, as per the Draft NEP 2019, 'Public and private sector enterprises and organisations, including philanthropic organisations, will also be given the opportunity to similarly participate in the NRF's research mechanisms.... They will also benefit from the peer-review process of the NRF for allocation of projects to specific research groups, and be able to ensure that their research projects receive adequate oversight. [14.4.5] Moreover, the Draft NEP 2019 suggests that all the public and private sector enterprises will contribute a small percentage, say at least 0.1%, of their annual profits to research (such as donations for research to the NRF). This could be done within or outside CSR funds, and such contributions would come with suitable tax incentives. [14.4.6]

Hence, as NRF will draw funds from private entities, it will be inclined to serve their interest. Besides, the Draft NEP 2019 also suggests that all intellectual property rights, including publications and patents, of NRF-funded research will be retained solely by those carrying out the research, while giving the government (including any of its assigned agencies) the license to use, practice, or implement the research/ invention (or any of its output) for the public good without payment of any royalty or charge. In cases where NRF funding is being provided by a public-sector, private, or philanthropic entity for a particular research project, this entity would also receive, along with the government, the same royalty- and charge-free license to utilise the research and its output. [14.2.7] Needless to say, through this provision, the private entities will be benefited from the public exchequer and the knowledge will become the property of the individual instead of the society.

Projects for National Needs

Fourthly, the draft NEP 2019 says 'Divisional Councils may choose to emphasise certain subject areas within their division according to national needs, but all proposals within the disci-

pline of the division will be considered.' [14.2.1] It further notes that the types of proposals will consist of 'Research facilities of national and international importance, larger and longer duration projects/facilities of national importance or inspiration.' [14.2.2] In other words, transgressing upon the academic autonomy, the draft NEP 2019 is trying to mandate the area and theme of the projects. It's not a new phenomenon.

Earlier, the Central University of Kerala advised its Ph.D scholars to choose their topics from a given set of projects, a shelf of PhD topics 'in accordance with the national priorities'; in April 2016, the Gujarat government had also issued a similar directive, listing 82 topics of 'relevance' for PhD research in state universities; a high level meeting of MHRD held in December 2018, advised the Central Universities to "discourage research in irrelevant areas" and to ensure that PhD topics 'should be in accordance with the national priorities'. But we know that the purpose of research is to develop knowledge and the knowledge has no national boundary. The universities must have the freedom to pursue knowledge regardless of immediate gain or loss; they must be free from external interference.

Besides, the pertinent questions are: what do national priorities mean and how it should be judged? Who is going to determine which topic or issue is nationally significant or not and on what ground? Will it be the government or the market-demand or any other power that be, which will decide the issue, according to their own respective perceptions? Can that be allowed at all in academic world? Will it mean that any academically vital, fundamental and theoretical research without any direct bearing to so-called national issues of day-to-day life, will be deprived of having any grant to support it? It is totally unacceptable for any sane person who may desire to see the country develop in the quest of knowledge and epistemology, which is one of the goals of carrying out researches.

Further, in a class-divided society like ours with a handful of capitalists ruling over overwhelming majority of oppressed and exploited toiling people, both cannot have the same priority. The bourgeois- petty bourgeois parties in power, either at the Centre or in the states, act as the subservient political manager of the ruling capitalist class. Obviously, they tend to choose national priority, to fit the interests of their master, the monopolists and their market economy. With the help of the directives as above, they try to curb the autonomy and academic freedom and streamline education or research in accordance

with their interest. On the contrary, toiling people need the freedom to continue their quest for truth in unhampered way. Hence, the prime issue is that the freedom to choose topic or issues of research, that is the freedom of pursuit of knowledge and freedom of thoughts must not be guided by any such criterion as “national priority” determined overtly or covertly by any authority. Thus it's clear that under the plea of deciding the research topics related to the national importance, the NRF will fund the different absurd projects in line with the Sangh Parivar wasting public money to serve the capitalist-imperialist forces.

Hence, the NRF will spell disaster to research ecosystem owing to its utterly centralised structure, political control, and default project oriented and eventually market oriented motto. So, there is no need of such a new agency called National Research Foundation.

As regards the question of funding, robust governmental funding for the existing agencies is required to support outstanding research and innovation initiatives instead of drawing funds from the private entities.

But it shouldn't curb the autonomy of the agencies and scope of the researcher by any means. So, concerning the project proposals, we strongly hold that the government shouldn't mandate the area and theme of individual projects. A research student and his or her guide must have the full freedom to select the topic or issue. For sanctioning the necessary grant, the choice must be judged from the academic point of view and viability in the set-up in which it will be carried out.

On Regulatory Architecture

The Draft NEP 2019 upholds that 'the functions of regulation, provision of education, funding, accreditation and standard setting will be separated, and will not be performed by the same institution or institutional hierarchy. [P18.1.1] According to the new system, National Higher Education Regulatory Authority (NHERA) shall be the sole regulator for higher education, including professional education. The National Assessment and Accreditation Council (NAAC) shall develop an ecosystem of multiple Accreditation Institutes (AIs) and oversee the accreditation processes. The University Grants Commission (UGC) will be transformed into Higher Education Grants Council (HEGC) which shall be responsible for disbursing developmental grants and fellowships. All other current

regulatory bodies including NCTE, MCI, BCI and AICTE etc. may transform to Professional Standard Setting Body (PSSB) which may set standards for professions e.g. for teachers, doctors, engineers, nurses, etc. The General Education Council (GEC) shall set up 'expected learning outcomes' for higher education programmes, also referred to as 'graduate attributes.' In addition, the GEC shall set up facilitative norms for issues like credit transfer, equivalence etc., through the NHEQF [Page 325] They will not specify curriculum. Instead, they will specify professional standards and/or a curriculum framework, against which educational institutions will prepare their own curricula. [Page 299] The RSA will appoint the chairpersons, chief executives, and members of the Board of all of these bodies and they will report to it.

Firstly, the remnants of the democratic education and autonomy which still exist in the education system under different democratic bodies regulating different professions will be destroyed. The entire education system will be regulated by a few persons. Besides, it will abolish the cross checking by different statutory authorities for maintenance of standard of an institution. Then, what will be the real outcome? The Draft NEP 2019 admits that Setting up new HEIs will be made easier. [Page 333] It means that the NHERA, a single window regulatory body will simplify the process of establishing private institutions for higher education. It is crystal clear that on the one hand, this regulatory architecture will lead to the fascistic centralisation of education and facilitate the unfettered privatisation-commercialisation of education on the other.

Hence, this proposed regulatory architecture should be revoked and different regulatory bodies with democratically elected members should regulate the institutions of different professions and higher learning.

On Establishment of Rashtriya Shiksha Aayog

You are aware that according to the concept of democratic education the government should only provide fund to the educational institutions, but running of the institutions, determination of the course and content, methods of examination and evaluation – everything should be determined by the democratically elected bodies constituted with the teachers, educationists and other stake-holders concerned with education. This is the immutable concept of autonomy which the government must not encroach upon. The freedom and autonomy of education were achieved to some extent during the

British period through undaunted struggle of the pioneers of Renaissance in our country. But today the autonomy in education sphere is facing severe onslaught. Contrary to the concept of this democratic education, the Draft NEP 2019 envisages the creation of a National Education Commission (NEC)/ Rashtriya Shiksha Aayog (RSA) as an apex body for Indian education to improve the governance for the successful implementation of the plans.

Autocratic Structure of RSA

Regarding the structure of RSA, the Draft NEP 2019 opines that as the highest level functionary of the government, the Prime Minister (PM) will chair RSA and bring to bear the vision of education and the authority of the office in directing the educational endeavour. And the Vice-Chairperson of RSA will be the Union Minister of Education. The RSA will consist of approximately 20-30 members.

The membership of RSA will include some of the Union Ministers, in rotation, whose ministries impact education directly (e.g. health, woman and child development, finance), as well as a few Chief Ministers of States, in rotation, the Principal Secretary to the Prime Minister, the Cabinet Secretary, Vice-Chairperson of the Niti Aayog, the senior-most Secretary in the Ministry of Education, and other such senior bureaucrats/ administrators as the government may deem appropriate. Although it has a provision that at least 50% of the members of RSA will be eminent educationists, researchers and leading professionals from various fields such as arts, business, health, agriculture and social work, they will be predominantly the lackeys of the central government. Because the National Education Commission Appointment Committee (NECAC) will be consisting of the PM, The Chief Justice of India, the Speaker of the Lok Sabha, the leader of the opposition in the parliament and the Union Minister for Education (UME).

Furthermore, the RSA will nominate the members of Executive Council and Advisory Council as well. And all the National level apex bodies such as (Proposed) National Higher Education Regulatory Authority, National Accreditation and Assessment Council, (Proposed) General Education Council, (Proposed) Higher Education Grants Council, National Council of Educational Research and Training, National Institute of Educational Planning and Administration and (Proposed) National Research Foundation will report to the RSA, which will oversee their smooth and effective functioning. Even the

RSA will appoint the chairpersons, chief executives, and members of the Board of all the bodies that report to it. The RSA will be extended to the states as Rajya Shiksha Aayog or the State Education Commission (SEC). Needless to say, the entire education system will come under total control of political power at centre and the state governments, universities or educationists will not have any say regarding the educational policies & decisions.

Superhero Concept Corresponding to Hitlerite Regime

Besides, it is very disgraceful that the drafting Committee notes that 'this will take commitment and leadership of the type we have not seen since the time of the Independence movement' [Ensuring implementation in spirit and intent, Page-34] thereby projecting the Prime Minister Mr Modi as a superman which has resemblance to the Hitlerite regime. And placing RSA under him, the Draft NEP 2019 aims at all-out fascistic centralisation of education.

Furthermore, the Draft NEP 2019 suggested that the 'social workers and counsellors will be hired to school complexes [see P3.8] to work with students - and their parents, teachers, tutors, Instructional Aides (IAs), and community members - to help ensure the retention in school and the mental health of all children.' [Page 64] It is our strong apprehension that while the Prime Minister will be at the helm of affairs of the education system, the RSS supporters will enter into the schools in the name of the social workers. As a result of which entire education system will be under the control of the Sangh Parivar in the name of helping.

As an inevitable fallout of this design, the educational institutions will be converted into the place of spreading political agenda of hatred. Because the Sangh Parivar wants to pursue its political agenda through education. Already the BJP government has introduced books of Mr Dinanath Batra in primary education of some states which has so many myths about different scientific inventions. We have already witnessed that our Prime Minister and his cohorts are propagating unscientific ideas openly. Even various institutions such as Indian Science Congress, ICHR and others are being used to propagate distorted science and history. If this draft is finalized, then our educational institutions and our syllabus will be full of irrationality, religious fundamentalism, intolerance towards other communities and unscientific thoughts. Eventually, it will push our future generation towards utter darkness.

Hence, this proposal to create RSA should be revoked and it should be ensured that the democratically formed independent bodies comprising of teachers, educationists, parents and students should govern the education system at all levels.

On Financial Responsibility of Education

The Draft NEP 2019 asserted that the 'public expenditure on education in India was 2.7% of GDP in 2017-18. This was about 10% of the total government (Centre and States) spending (Economic Survey 2017-18). Public spending on education has never attained the 6% of GDP envisaged in the 1968 Policy, reiterated in the Policy of 1986, and which was further reaffirmed in the 1992 Programme of Action. [Page 402] The Draft NEP 2019 envisions significant increase in public investment in education. This would go up from the current 10% of overall public expenditure in education to 20%, over a 10-year period. [Page 403] It recommends that 'all States allocate at least 20% of their overall spends to education.' [Page 407] Thus the Draft NEP 2019 tactically avoids the role of the central government on one hand and decreases the contribution of the states to 20% against the popular demand of 30% of the state budget for education on the other.

While the Draft NEP 2019 reaffirms the national commitment of 6% of GDP as public investment in education, it recognises that this would only be possible as India's tax-to-GDP ratio improves. [Page 406] The recent trends reported and projections are optimistic in terms of the tax collections; e.g. if trends such as 'a 50% increase in unique indirect taxpayers under the GST' and 'additional 1.8 million individual income tax filers since November 2016' (Economic Survey 2017-18) continue, the increased allocation can happen at a faster pace. [Page 407] Thus the Draft NEP 2019 imposes a unique condition by which the central government may deny its role regarding allocation. Contextually, it can be mentioned that the data from the 2017-18 annual financial audit of government finances conducted by the Comptroller and Auditor General (CAG) show that Rs 96,013 crore of education cess is lying unutilised. Alas! The central government couldn't be able to utilise this additional tax even. But the Draft NEP 2019 couldn't utter a word in this regard. In this way, the Draft NEP 2019 shields the governments and helps them to shirk the financial responsibility of education.

Hence, AIDS0 holds that total financial responsibility of education should be borne by the government and to

facilitate this at least 10% of the central budget and 30% of the state budget should be allocated for education.

Draft NEP 2019: Old Wine in a New Bottle

The Draft NEP 2019 declared that 'the unfinished agenda of the National Policy on Education 1986, Modified in 1992 (NPE 1986/92) is appropriately dealt with in this Policy.' [Page 26] It also acknowledges that starting from three-language formula, School complex to vocationalisation of education, everything was recommended by the earlier policies, more particularly by NEP 1986. But NEP 1986 couldn't foresee the Internet revolution and its effects which resulted in the sluggishness. Moreover, the lacunae also lies in the process of its implementation. Now, according to the Draft NEP 2019, it encompasses everything and the commitment of present leadership will pave the way for the effective implementation.

While NEP 1986 opened the floodgates of commercialisation of education, the Draft NEP 2019 is leaving no stone unturned to accelerate it. Shamelessly it says that 'Our ten trillion economy will not be driven by natural resources, but by knowledge resources.' [Page 33] Apart from this all-out commercialisation of education, the most dangerous aspect of the Draft NEP 2019 is the attempt to wipe out scientific modern education completely.

So, it is our considered opinion that the major trends of the Draft NEP 2019 do not differ from the earlier ones, barring stronger and more centralized efforts. It is like the 'old wine in a new bottle.' However, what is more dangerous, if not unique, is a cunning effort towards covering these trends under cloaks.

Hence, this Draft National Education Policy 2019 should be rejected lock, stock and barrel. Instead a 'New National Education Policy' may be drafted democratically.

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DEMANDS

- *Reject Draft National Education Policy 2019*
- *Reintroduce Pass-Fail System from class I*
- *Scrap National Medical Commission*
- *Stop Fee Hike-Privatisation-Commercialisation of Education*
- *Stop Communalisation of Education*
- *Stop Spreading of Obscenity-Liquor-Drugs and Atrocities on Girls & Women*
- *Provide Employment to All Youths*



OPEN SESSION

26 NOVEMBER 2019 DHARNA CHOWK, HYDERABAD

DELEGATE SESSION

27-29 NOVEMBER 2019 EXHIBITION GROUND, HYDERABAD

AIDSO

All India Democratic Students' Organisation

All India Committee



Eminent educationist Shri Prakash Bhai Shah was inaugurating the National Students' Convention against the Draft NEP 2019 at Ahmedabad, Gujarat on 29 September 2019 and the leaders of AIDSO were sitting on the dais. State Secretary of SUCI(C) Gujarat State Com. Minakshi Joshi welcomed the delegates. In this convention, more than 300 delegates participated from 22 states of the country.

Com. Ashok Mishra, the General secretary of AIDSO is discussing on Draft NEP 2019 in a Seminar organised by All India Save Education Committee at Jamshedpur, Jharkhand on 21 July 2019



Protest at Bhubaneswar, Odisha against Draft NEP 2019 & other educational problems on 13 Sept. 2019



“Our education system is becoming more and more restrictive and undemocratic. The demand for free universal education of the pre-independence day is getting the worst jolt from the present rulers of the country. Under the pretext of improving the standard of education, even the existing scope of education, is being squeezed and education is being made more and more costly, resulting in curtailment of education.”

“Instead of instilling students with scientific and systematic reasoning, we observe that there is a growing tendency to bring about a peculiar fusion between spiritualism and science. This trend in our educational life is indeed alarming as it is characteristic of fascist culture.”

- Shibdas Ghosh
