

ALTERNATIVE HIGHER EDUCATION POLICY

HISTORICAL BACKGROUND

On 29th July, 2020, by a surprise and unprecedented move, Central Cabinet endorsed National Education Policy. Central Government Continued the process of evolving NEP for more than five years, projected the myth of all pervasive education, choose an opportunity at a time when the entire country was in the grip of catastrophic pan epidemic Corona and made public the NEP. The draft proposal of 486 pages were compressed into 66 pages, but essentially incorporated the vision of the draft without much recognition to the voices of dissent and criticism that came during the period. Naturally the reaction to NEP is also in the expected line. We find staunchest advocates and apologists of NEP, who have turned the document as a milestone in the educational development of the nation, vibrant instrument for carrying forward the aspirations and ambition of 21st Century India. On the contrary there is a vehement criticism that NEP is an imposition on the collective wisdom of the nation and threatens the constitutional ethos of India such as democracy, socialism, secularism, federalism and social justice. In order to understand the real nature of NEP 2020 and to prepare an alternative higher education policy a brief sketch of historical background is imperative.

Crises in education: Historical perspective

Pre- independence stage:

The crises which we perceive today is nothing new. It has a long history of its own, closely linked with the educational development. The history of education from time immemorial reflects a continuous conflict between the forces those who want to make education the privilege of a few and those who endeavors to rescue it from the prison of caste, community, religion and dominant economic forces. The educational development is ultimately determined by the economic and political need of the society and in a class divided society by the needs of the dominant class in society. The class basis of education is seen clearly in the story of Ekalavya, the student from the menial class who had to pay his thumb for having learned the art of archery. The prescription of Manu that molten lead shall be poured into the ears of Surdras who happen to hear the recitation of holy scripture is another example to show that our ancestors who were aware of the fact that education could act back on the stability of social system. In ancient as well as medieval India only such type of education was to be encouraged by the dominant class that could enhance the stability of the system and the system envisages was an inequitable one and against all democratic values. The Britishers also formulated education policy as reflected in Maculay and other commission report to cater to the economic and political need of colonialism. From the ancient days till we come to the end of British Raj education

has never been the concern of the state. Democratic values have been tampered to suit the need of the ruling class. As a result the ruling elite succeeded in creating a conducive infrastructure for commercialisation and communalisation of education. In the past there has been many attempts to free education from the clutches of caste, community and religion, but unfortunately these movements for democratic values of education did not have powerful momentum in the face of feudal, colonial and capitalist forces. Raja Rammohan Ray, Iswar Chandra Vidyasagar, Jyotiba Phule, Savitribai Phule, Shahu Maharaj, Syed Ahmed Khan, Gokhale, who tried unsuccessfully in 1912 to get a legislation passed to make primary education compulsory. Mahatma Gandhi and BR. Amedakar's concept of education also failed to meet the growing challenges of the communal world. After the revolt of 1856 and during the course of their long rule, the British felt pressurized to establish three Universities in the Presidencies of Calcutta, Bombay and Madras to buttress the interest of empire. Before 1947 there were only twenty universities and approximately 2,38,000 students.

Post- Independence (1947 – 86): - Era of short lived optimism

The much-awaited freedom of India came on 15th August 1947. Centuries of colonial and feudal exploitation ended and the future of the nation was erected on the foundation of the constitution committed to the values of democracy, socialism, secularism and federalism. The lessons derived from freedom struggle became guiding spirit of the new emerging nation. The founding pillars of Indian educational system was built upon by the values of freedom struggle reflected in the constitution of India. Article 45 was incorporated in our constitution where the state took the solemn oath to endeavour to provide within a period of ten years from the commencement of the constitution for free and compulsory education for all children until they complete the age of 14 years. Article 39 of constitution state "the health, strength of workers, men and women and the tender age of children are not abused and that "citizens are not forced by economic necessity to enter avocations unsuited to their age or strength". The Government immediately after independence set up two commissions to make recommendations in the field of education. These were the University Education Commission (1948) under the chairmanship of Dr. S. Radhakrishnan, and Secondary education commission (1952) under the chairmanship of Dr. Lakshmana Swami Mudaliar. The Radhakrishnan's commission recommendation became the founding spirit of higher education of our country. The commission underlined the ideas of democracy, secularism, social justice while recognising the inspiration derived from cultural diversity, developing scientific outlook, autonomy and least Governmental intervention in the spheres of Governance. In 1964-66, the Kothari commission was formed under the chairmanship of Dr. D.S Kothari. The report submitted in 1966 entitled "Education and National Development" gave a comprehensive picture of the new crises, calling for a drastic reconstitution of Indian education, almost a revolution. The Kothari commission recommended common school system, primacy of the role of teachers, decentralisation of the education, reducing the gap between urban and rural and

developing scientific temperament and outlook. The Kothari commission proudly recommended that “the future of the country is being shaped in the class room”. In 1969, the Government of India appointed the Gajendragadkar commission on Governance of universities. The commission had recommended drastic changes in the structure of the universities to give the state Governance a greater control on the universities. Much before the National Education Policy 1986 was announced, the Dunkel commission report, inviting foreign capital with the help of world bank and IMF, look for export led growth, initiated a trend of reducing funds for education, health, public distribution and public transport. The seeds of privatisation of education in general, higher education in particular were sown prior to the introduction of the NEP 1986.

Development (1986-2014)

The new education policy 1986 formally saw the end of democratisation of education and paved way for the ascendancy of corporate forces. The NEP 1986 had an elitist bias, open the door of privatisation, talked of depoliticisation of campus and suggested a dual structure of institutions. This policy not only proposed privatisation but also bureaucratisation of education. This policy proclaimed the idea of autonomous colleges, delinking degree for the job, centralisation of academic administration etc. The formal acceptance of ideology of globalisation by the Indian Government irrespective of change of Government since 1991 led to progressive withdrawal of public funds from higher education. The concept of welfare state holds no longer a primary position. During the period under review we find formation of Acharya Rama Murti review committee which discussed on “Towards an enlightened human society”. The report talked of equity and social justice, decentralisation of educational management, active participation of all stake holders, human enlightenment and empowerment for work. These were only pious declarations and the fall of the ruling dispensation at the centre failed to translate it to reality. An agenda paper circulated to state education Ministers on 22nd October 1998 (when Dr. Murali Manohar Joshi was the Minister HRD) talked of communal and divisive agenda in the sphere of education i.e. Indianized, Nationalised and spiritualized education and introduction of unscientific curriculum such as astronomy, astrology, priesthood etc.,. The approach of the state reflected in the state paper on “financing higher education” also indicated shift towards privatisation.

The dawn of the 21st century has seen a paradigm shift in the sphere of education in general, higher education in particular. The Knowledge commission report, Birla Ambani report, GATT’s stipulation treating education as a commodity, proposed university mode act, legislation on entry of foreign universities. Series of MHRD and UGC reports during the period from 2002 to 2014 indicate a deep crises in which our educational structure being left. Departure from the concept of welfare state, retreat of the state from the field of education, higher education as a non-merit good, higher education Vis-a-Vis primary education conflict have created chaos and confusion in the domain of higher education. The education in general and higher

education in particular have been seriously threatened by the forces of liberalisation, privatisation, globalisation, communalisation, mechanisation of emotions and regimentation of thought. The Government of India has abandoned its constitutional responsibility through the withdrawal from public funded education system from primary to university level which had a dangerous potential for re-colonisation and ghettoisation of our beloved nation. Proliferation of self financing institutes and colleges, cross boarder institutes, private universities, foreign universities, freezing of grant, contractual appointments, undemocratic functioning of the universities including tampering with university acts, erosion of academic autonomy of universities, introduction of NAAC to starve the institutions of higher learning – all had ominous design which would further strengthen elitism and detrimental to the democratisation of education system. The talk of Internationalisation of education, digitalisation of education system, knowledge revelation gained momentum under the dictates of market forces which tended to make education exclusionary.

When NDA Governmn under the leadership of Prime Minister Sri Narendra Modi announced the NEP 2020, the educational system of our country is pregnant with series of contradictions. There has been a serious threat to constitutional ethics of education and series of earlier neoliberal measures made the concept of access, equity and quality under serious stress and strain. The basic question before the Government was whether to rescue the system from internal historical contradiction so that to have an inclusive system or to follow the traditional exclusive system ? Whether to succumb to the logic of market or respect constitutional values ? and to properly diagnose the disease and provide realistic prescription in the greater interest of education and nation. The following in-depth discussion on NEP 2020 would reflect the dream and reality contradiction, hidden agenda of ideological domination, honeymoon of corporate and fundamentalist, mismatch between diagnosis and prescription. Announcement of NEP 2020 once again has opened the Pandora box of historical and eternal conflict of domination of capital and voice of the people. Alternative higher education policy strictly in conformity with our constitutional ethics can only save education, save campus and save nation.

Empirical Base of Policy Recommendations, NEP 2020

The National Education Policy 2020 (NEP 2020) envisions a complete overhaul of the higher education system. To overcome the shortcomings in the Higher Education System, the NEP 2020 proposed Key changes which include, moving from affiliating public university system to large multidisciplinary unitary universities, major changes in qualification framework including the multiple duration of Bachelor, Post Graduate and Ph.D., degrees, revamping curriculum with a focus on knowledge, skill and value Education, merit based tenure appointment of teachers, emphasis on teaching in regional languages and on learning Sanskrit, establishment of a National Research Foundation, emphasis on online education

and open distance learning and regulation by a single regulator for Higher Education and Others.

If the NEP 2020 proposed such a comprehensive overhauling of the system, it is legitimate to ask a question: What is the knowledge base of the proposed changes in the Higher Education System? Like the earlier commissions, has it done a thorough study of the present Higher Education System, identified the short comings and proposed the measures to correct them.

It is quite clear that the earlier policies were based on an in-depth study of the Higher Education System in the country. The Higher Education policy during 1948-1968 was shaped by the “Professor Radhakrishnan Commission Report of 1949” and by the Higher Education and Secondary Education Commission report of 1952. Kothari Commission report 1964-66 on Higher Education has contributed greatly for the growth of education in India. The 1986 “New Education Policy” and program of action 1992 brought about a significant change in Higher Education System.

Professor Radhakrishnan Commission had 10 members of which four were foreigners. A comprehensive questionnaire was circulated to the members of the Constituent Assembly, Premiers and Ministers of Education in the provinces and States, Vice-Chancellors of Universities, Directors of Public Instructions, Heads of Colleges and Heads of Departments in Universities, Educationalists, Publicists and prominent persons throughout the country.

The recommendations were largely based on the valuable evidences and the constructive suggestions received by the commission. Thus, the commission was able to obtain a great deal of direct knowledge of the working of the Universities and Colleges. The Commission members visited about 20 Universities from 26 states, had discussion with the Vice-Chancellors, members of the syndicate, leaders of public opinion, Principals and professors and other members of the staff, met them in small groups and heard their views. In several places the commission met the representatives of the students, and acquainted with their points of views.

The Kothari Commission had 17 members of which 7 were from outside India. It had 20 consultants, 21 task forces working with 251 experts and 21 sub groups. It enlisted the opinions of 9000 individuals covering educators, scholars and scientists. It brought out the monumental report after working for 21 months.

In contrast, the Prof. KasthuriRangan Committee report is based on 2015 report prepared by a committee headed by a former cabinet secretary TSR Subramanian which mainly prepared the report on the basis of secondary data. The Ministry revised the report with its inputs and brought out a revised report called “Some inputs for Draft National Education Policy 2016”. Because of the criticism levelled against the report that the academicians were not associated with the committee, the Ministry hurriedly set up a committee under the chairmanship of Prof. KasthuriRangan and few other academicians and submitted the report within six months.

The chairman of the committee Prof. KasthuriRangan has confessed in his introduction: “At that time, my thinking was that the committee would build on the extensive work already done by the TSR Subramanian committee and some inputs for draft National Education Policy 2016 brought out by the MHRD. All this seemed doable in six months. However, what followed was something entirely different. It became very clear soon that this committee was going to be “out of the box” in its thinking. Each member displayed a distinct way of thinking, with unique inputs to offer, based on their background and experience. The members also brought rich and unique insights about our society and their implications for education. This diverse set of ideas brought freshness in the process of the development of the policy. It was quite clear that this was a great asset and as chairman I had to utilize maximally this strength of the committee”.

It is quite obvious from this confession that NEP 2020 is based mainly on knowledge of higher education taken from secondary data supplied by NIEPA. Not all members were experts in Higher Education. Therefore, they did not have much knowledge about the current status of Universities, Colleges and other Higher Education Institutions. Given the time constraints, it seems that they depend on the best practices of other countries, particularly the USA and some European Countries like Germany, Netherlands and much less of best practices of Indian Universities / Colleges / Institutions. They drew heavily from US education system. These borrowed recommendations include “the large unitary multidisciplinary University system in place of affiliating public university system, multiple duration of undergraduate degree with 4 year Bachelor and 1 Year Master program and multiple exit and entry, qualification framework, research and teaching universities, curriculum with a focus on skill embedded at all levels of education, merit based tenure track appointments for career progression, establishment of a National Research Foundation, National Test for admission in Universities/Colleges, emphasis on online education. The new suggestion relates only to learning of Sanskrit language, Sanskrit knowledge system in all social sciences and sciences, value education indirectly based on teaching of a particular religion.

It must be recognized that there are limits to adoption of best practices from other countries. General experiences show that education system of each country is evolved within itself and therefore each country has a unique character suited to their local situation, despite adoption of some practices from other countries.

It must be recognized that higher education sector has not been officially studied since Kothari Commission Report in 1966. There has been large scale privatization of Universities and Colleges since then. There are other features related to admission method, curriculum, pedagogy and evaluation, medium of instruction and organizational pattern, which have changed significantly. We have not attempted to study the system since 1965. The Ministry has taken initiative to receive some information from Universities and Colleges only after it developed the online portal in 2012. Therefore, our policy formulation operates partially in the zone of ignorance

about our educational system. This Government should have taken a comprehensive study of the system as basis for policy formulation for drastic change in Education system. It should have been based on empirical evidence of ground reality in higher education in the country.

Unless we study the changes and know the weakness and strength, we may not be in position to overcome and build on our strength and overcome the weakness. Thus, we lost the greatest opportunity of developing policies based on empirical evidence of ground reality in higher education in the country.

New Institutional Architecture

The declared policy thrust of National Education Policy (NEP) 2020 is “.. to end the fragmentation of higher education by transforming higher education institutions into large multidisciplinary universities, colleges, and HEI clusters/Knowledge Hubs, each of which will aim to have 3,000 or more students.” This is described as the “highest recommendation of the policy” as elaborated in Chapter 10 of the document. Large multidisciplinary HEIs to be established in or near every district by 2030 with the aim to increase the GER in higher education including vocational education to 50% by 2035. Ancient institutions such as Nalanda and Takshashila are cited as examples to justify above recommendation.

To delve into an assessment of this framework that is sought to be imposed on the higher education system, it is necessary to examine the growth and distribution of higher education in last decade, as seen from various AISHE Reports:

Growth of Higher Education

	End of 11 th Plan – 2012	End of 12 th Plan – 2017	2018- 2019	2020- 2021
Universities	667	864	993	1113#
Colleges (All)@	35525	40026	39931	43796
Stand Alone Inst	11565	11669	10725	11296
Percent of Rural colleges	55	59.3	60.53	61.3
Gross Enrolment *	302	357.1	374.0	413.8
Density - colleges per lakh population (18-23 years)	25	28	28	31
Average Enrolment Per college	715	659	698	646
GER	21.5%	25.2%	26.3%	27.3

Source: All India Survey on Higher Education (AISHE) – various Reports @
Affiliated and Constituent colleges #Percent of Universities in rural areas is 43%

* Enrolment in lakhs

Average Institutional density (no. of colleges per 1000 sq.km) as of 2017 was 16.8 (*Ghara, 2018*) which is less than 2 colleges per 100 sq. km. This important indicator of spatial distribution of HEIs with state - wide variations (barring union territories), ranging from below 2 in Arunachal Pradesh and 2.3 in Mizoram to 51.2 in Kerala, is completely ignored by the NEP 2020 and AISHE reports too do not estimate this indicator.

As per the 11th five-year Plan (2007-12) the objectives of access, equity and quality were sought to be achieved by establishing new colleges and universities including Model colleges in educationally backward districts; strengthening and expanding existing institutions, upgrading few select Universities with “potential for excellence” and strengthening Distance education. It was proposed that apart from increasing budgetary allocation, the additional resources required can be generated by increasing fees and also by developing loan and scholarship programmes.

The 12th Plan document (Government of India, 2011), however, in a shift from the 11th Plan, proposed to achieve objectives of access, equity and quality in higher education through a set of structural reforms with the principle of “strategic central funding based on state higher education plans”. These reforms were set in motion by the RashtriyaUchchar Shiksha Abhiyan (RUSA), by replacing the principle of “need-based” funding with that of “norm-based” funding

Some characteristics of the growth and distribution of higher education:

- 48.6% of the enrolment comprises of women students as compared to 45% in 2012-13
 - Category-wise enrolment: General – 44.2%, SC – 14.2%, ST – 5.8% and OBC – 35.8%.
 - Distance enrolment constitutes 11% of total enrolment. It has hovered around this figure since 2013. 91% of UG and 75% of PG students study in regular mode.
 - Stage wise enrolment: UG-79.8%, PG-10.8%, Research- 0.53%, Diploma/Certificate - 8.9%
 - 34.8% run single programme; (40% in 2016-17)
 - Enrolment is less than 100 in 16.6% colleges and between 100 to 500 in 48.5% colleges. Only 4.3% have enrolment above 3000.
- | | | | | | | |
|---------|--------|-------|-----------|-------|-----------|------|
| Govt : | Number | 21.4% | Enrolment | 34.5% | Average | 1097 |
| Aided | | 13.6% | | 21.1% | Enrolment | 1057 |
| Unaided | | 65.0% | | 44.4% | | 465 |
- The percent of Stand-alone institutions in rural areas has been about 56%-58% over the years.
 - Number of colleges in 2007 was about 23000 and the GER was 11%.

The targets set under RUSA were to increase the GER in higher educational institutions to 25% by the end of 12th Plan (2012-2017) and to 32% by the end of 13th Plan (2017-2022) by “creating additional capacity in existing institutions and establishing new institutions”. Notwithstanding that the entire Planning process was abandoned, it is clear that the last two Plans stressed on expanding existing capacity and opening new institutions for increasing GER.

The NEP 2020 neither makes any critique, nor a quantitative appraisal of the achievements and shortcomings, if any, of the earlier policies and 12th Plan in particular.

In order to operationalize the institutional architecture, UGC unveiled the “*Guidelines for Transforming Higher Education Institutions (HEIs) into multidisciplinary institutions*” in September 2022, to be executed by state governments and universities. Main features of this framework comprise of :

- i) Developing three types of institutions:
 - a. Multidisciplinary research-intensive universities (RUs)
 - b. Multidisciplinary teaching-intensive universities (TUs)
 - c. Degree-awarding multi-disciplinary autonomous colleges (smaller than a university)
- ii) Strengthening the necessary institutional infrastructure.

This framework is expected to be set up by

- Forming HEI clusters for facilitating multidisciplinary education and research in different modes.
- Phasing out single-stream institutions through merger with other multidisciplinary institutions under the same management or different managements.
- Strengthening of institutions by adding departments in subjects needed for a multidisciplinary institution.

Various types of academic collaborations are proposed between partnering HEIs for granting Dual Degrees, with physical proximity as an operational requirement. The underlying aim is pooling of resources and “facilitating weaker colleges to have access to better facilities.”

The recommendation to “end fragmentation of HE” through consolidation of HEIs is antithetical to one of the important objectives namely expansion of opportunities for access. It ignores the fact that, in the last 15 years, the base of HE has mainly expanded in rural areas, providing access to students in far-flung rural, hilly and tribal areas, which is one of the reasons of low average enrolment in majority of the colleges. The impracticability of the various types of academic collaborations is exposed by the ‘operational requirement’ of physical vicinity for

collaborating institutions, when the average institutional density is not more than 2 colleges per 100 sq. km. There is over emphasis on sharing of physical and human resources, including financial resources for Research. Pooling of resources will create several bottlenecks for the students and faculty of weaker HEIs. Sections of faculty will be rendered surplus.

The so called “Consolidation” through clusters and mergers and phasing out Stand-alone and single-stream institutions will bring majority of HEIs under severe strain leading to their closure, thereby shrinking the expanding base of higher education. The data on the growth of HE in our country, as seen in Table clearly reveals that the doubling of the GER from about 11% at the beginning of 11th Plan in 2007 to 21.5% in 2012-13 has coincided with the rise of colleges from 23000 to over 35000.

The affiliating system has an important advantage in the Indian Context as it is easy to get admission at an affordable cost. These affiliated colleges are spread wide in all geographical regions so that students in any part of country will have easy access to higher education. The changeover might affect the access to affordable higher education. Therefore the idea of proposed unitary / cluster universities located in different places with under graduate, post graduate and Ph.D., program may reduce the easy access to the students from rural remote area and small towns.

Restructuring of UG and PG Courses

The Kothari commission had brought uniformity in the pattern and duration of UG and PG degrees. There were wide variations in the duration and pattern of UG prior to 1966 policy. Therefore, it brought uniformity by bringing in 3+2 system, namely 3 yr UG and 2yr PG programs. The NEP has suggested a major change in the duration of the UG and PG programs.

UGC’s Guidelines “Curriculum and Credit Framework for Undergraduate Programmes” issued in December 2022, are to operationalize the second most significant recommendation in the NEP 2020 of moving towards a more multidisciplinary undergraduate education. It proposes a program of UG, PG and Ph.D., degree of multiple durations. Thus, the UG degree will be of either 3 and/or 4 yr duration with multiple exit options within this period with appropriate certifications, a certificate after completing 1 yr in a discipline or field including vocational and professional areas or a diploma after 2 yrs in study, or a Bachelor’s degree after a 3yr programme and 4 yr multidisciplinary Bachelor’s program. The 4 yr program may also lead to a degree with research if the students complete a rigorous research project in major area of study.

There will be a flexibility in the Master’s programs with different duration

- (i) there may be a 2 yr program with the second year devoted entirely to research for those who have completed the 3yr UG program
- (ii) for students' completing a 4yr bachelors' program with research there could be one year Master's program and
- (iii) There may be an integrated 5 yr Bachelor's/ Master's program. Undertaking a Ph.D shall require either a Master's degree or 4 yr Bachelor's degree with research.

Credit mobility between collaborating HEIs and Online learning are the tools to be adopted by institutions to facilitate "multiple pathways" for multidisciplinary higher education. All courses will be credit based. Students will earn credits from combination of Major, Minor, Multi-disciplinary, Value added, Skill based and Ability Enhancement courses along with summer internship/apprenticeship. The HEIs have been asked to register with Academic Bank of Credits which will digitally store academic credits of students. The given Credit framework dilutes the weightage for major discipline courses – thus the lustre of a specialization will be eroded. For majority of HEIs, physical collaboration will be non-feasible, as pointed above. For subjects not offered by their colleges, students will be constrained to collect credits through online courses.

The NEP 2020 does not give definite reason for 3 and 4 yr duration of Bachelor degree. However, this proposal will have negative implications to economically and socially disadvantaged groups. The proposed Bachelor degree of 3 yr duration and 4 yr duration and Master degree of 1 yr duration and 2 yr duration for obvious reasons will create gradation and hierarchy in Bachelor and Master degrees. The degrees with different duration will affect the students in employment and other matters. The employer may prefer the graduate students with 4 yr duration compared to 3 yr duration. So Bachelor / Master degree with multiple durations may turn out to be discriminatory to the students with 3 yr Bachelor and 2 yr Master. This will affect the poor students more, as more of them are likely to end up with 3 yr Bachelor degree. The student with 4 yr Bachelor degree and 1 yr Master degree may be preferred in the employment market. Besides the increase in the duration of UG from 3 to 4 yrs will affect the economically weaker section of the society more because of higher cost.

The 4 year degree course too is not acceptable. One has to remember that majority of the students who join higher education is not academically inclined and a year more into completing the graduation course will not be possible for them. Doling out a diploma at the end of each year of college will devalue education. Learning is a continuous process and taking break from a course for most students would mean the end of academic career. The undergraduate degree course allows students to prepare for future academic pursuits. If the graduation course is truncated with a diploma or a certificate at the end of each year, no proper training could be imparted to any section of the students. We cannot overlook the maturity of the students in

grasping the contents of the curriculum in a year and then opt for a vocational course. The prevalent system of enrolling students in Honours and General courses can be remodelled. For students pursuing the General course, simultaneous training in vocational subjects could be arranged but leaving the graduation course at the end of the year would lead to nowhere. Neither the student will learn enough in the first year of studies at the college/ university nor could they fully fathom the nuances of vocational training with incomplete knowledge of the subjects they took up. An additional year at the undergraduate course would not help this section in any way. For those students who want to follow academics in future, let them major in the chosen, allied subjects. One can think of introducing these students into broader areas of interest for better orientation in the chosen subjects.

The NEP mentions that the 4 yr Bachelor degree is proposed for the convenience of the students who want to pursue Master's program in foreign Universities like USA which require 4 yr graduation. This is not a good justification for 4 yr graduation. Those who want to pursue Master degree in foreign countries may do so after doing one yr preparatory course. Vast majority of students should not be penalized by making bachelor degree expensive by adding one more year.

Our proposals in this connection are as follows:

1. The current three-year UG degree and two year PG degree programmes should continue. The two year Masters/Postgraduate degree is extremely important for developing proper understanding of the subject taught at the undergraduate level. And except few, extraordinarily meritorious students, most students require time to develop their research interest.
2. Those who want to pursue Master Degree in Foreign Countries may do so after doing one year preparatory course.
3. We suggest that M.Phil should continue. The option of directly registering for a Ph.D or doing an M.Phil before registering for Ph.D should continue. Ph.D is a time consuming arduous process. It may not be possible for all to pursue a Ph.D for various reasons. MPhil degree allows many to undertake some preliminary research on a topic of one's own choice. M.Phil degree is a globally recognised criterion for students seeking admission for doctoral programs in foreign universities.
4. Under the current system with reduced number of seats for Ph.D and the various regulations in place, getting registered for a Ph.D programme has become more difficult than ever and for in service teachers who want to pursue Ph.D, the opportunity is severely restricted. If promoting research is the high agenda of the NEP, make the process easy and not restrictive. We propose integrated MA_M.Phil_Ph.D programme along with separate provision for inservice teachers to register for Ph.D.

Another detrimental aspect of the framework is that, regardless of the nature of these qualifications, it aims to vocationalise them. Throughout the pathway of studies, at every interim exit, it emphasizes employment ready and entrepreneurship skills and mindset. Compulsory vocational course for getting UG Certificate/Diploma at exit point will also introduce additional fees. Those who exit midway may not get re-entry if the intake is reduced by then due to reduced demand. The plot behind it rather seems to suggest that by imposing a break in studies, the framework pushes the students to downward skilling from their original desire for upward skilling. The answer to these questions lies in the framework's ability to cater intergenerational skill mobility from the descent-based ones to the modern skills. This will happen only when the educational system and its framework facilitate students to complete their choices of studies instead of forcefully kicking them out half way through.

Vocationalisation of their chosen studies and employment should be their choice, not the choice of nation state and its grand allies, such as specially cultivated communities and liberal market forces. They should be allowed to democratically opt their career based upon their own convictions. The framework is nothing but encroaching undemocratically into the individuals' educational desire and career choices to make a citizenry per the wishes and aspirations of the nation state which is truly a violation of human rights. As a result, the framework will undesirably widen the skill gap between the socially elite and the socially backward and the latter will be forced to remain in the jurisdiction of their traditional occupation without any upward mobility.

We are not against introduction of multidisciplinary approach but we want to state even in the present times we do follow the same approach. For example, students who have taken History honours/ major usually have in their combination subjects like Political Science, Sociology, Economics etc as that helps in better understanding the historical contexts. Even at the Postgraduate level there is cross over of topics and subjects that are not part of the specific discipline per se taken up by the student. In both central and state universities the multidisciplinary system is being followed for years together. Therefore, multidisciplinary approach that is being talked about is not unique. The most fearful aspect of the NEP Recommendation is the tacit suggestion that students should opt for vocational courses for which the multidisciplinary approach comes in handy. We are aware that multidisciplinary approach does not develop any in depth or specialised knowledge of a subject. The students would know aspects of few subjects that help them choose a professional course. This is perfectly in tune with the way the four-year degree course has been envisaged. With the multiple exit and entry system, students after studying a combination of subjects in the first year can take a break and join some vocational or professional course. A generation of youths with hardly enough knowledge will be created. There is no guarantee that the vocational; course that most pursued would land them with a decent employment. The cafeteria approach in higher education is an ode to serious socioeconomic crises in the years to come.

We suggest that academic and vocational courses cannot be clubbed together as the orientation and purpose of both are different. For someone taking up a vocational course the main motive is to get a job while for the academic course the main intention is to grow academically, take more time before deciding about a job and embark on research even. Because of the diverse outlook in the outlook of the two approaches, we suggest that separate courses be designed and four-year bachelor degree course should not be ideally introduced.

Faculty Development

The NEP 2020 states that(Section 13.4) faculty will be given the freedom to design their own curricular and pedagogical approaches within the approved framework, including textbook and reading material selections, assignments, and assessments. Empowering the faculty to conduct innovative teaching, research, and service as they see best will be a key motivator and enabler for them to do truly outstanding, creative work: this again is a utopic suggestion because in the centralised university framework, teachers cannot design their own courses or teach according to individual choice. In a country like India where majority of students in HEIs are first time learners or come from challenged socio economic backgrounds, courses designed by individual faculty may not be in the best interest of the students served. Teachers can at best improvise on the existing curriculum and aid in innovative thinking but ‘to design their own curricular and pedagogical approaches within the approved framework, including textbook and reading material selections, assignments, and assessments’ cannot be done at the undergraduate and post graduate level. This can be carried out at the MPHIL/PHD course work by which time most students become familiar with the subject in which they are pursuing their research.

According to sec. 13.7of NEP, the presence of outstanding and enthusiastic institutional leaders that cultivate excellence and innovation is the need of the hour. Leadership positions shall not remain vacant, but rather an overlapping time period during transitions in leadership shall be the norm to ensure the smooth running of institutions. Institutional leaders will aim to create a culture of excellence that will motivate and incentivize outstanding and innovative teaching, research, institutional service, and community outreach from faculty members and all HEI leaders.

We are not clear in our understanding of the term outstanding and enthusiastic institutional leaders as mentioned in Clause 13.7. We oppose the idea of hierarchy that is inbuilt in this consideration. The Principal of any HEI cannot be likened to the leader of a political party or captain of the sports team or a corporate big boss. He/She solely looks after the efficient management of the college administration and academic need of his/her teaching compatriots and students of the institution. While the office of Principal remains august, the post of Principal is not that of a leader. He ensures a peaceful and friendly ambience within the campus

for free flow of knowledge from teachers to students, between the faculties and larger society. The campus of the HEI is the breeding ground of healthy discourses on all issues relating to contemporary times and developments and the Principal ensures that all these take place with minimal outside interference and disregarding to opposing points of views. The idea of leadership in an academic institution is not welcome. An efficient, high quality faculty is built over time and not an overnight development. In educational institutions suffering from dearth of teachers such suggestion is impossible to carry out and rather unrealistic. In our country just as we need more number of centres of excellence, we also need more number of colleges and universities where basic under graduate and post graduate courses will be delivered with sincerity of purpose. Quality education can foster only when the basics are right. No institutional leader of high calibre can work without a proper team for which recruitment of faculty is the first need. Not only leadership positions but faculty positions too cannot remain vacant. It is both our demand and suggestion that vacant teaching posts be immediately filled up. Not every institution of HEI can turn into centres of excellence, but full-fledged working HEIs with appropriate number of teachers and students can usher in quality academic environment.

According to NEP 2020 the newly formed National Research Foundation (NRF) will competitively fund research in all disciplines. Successful research will be recognized, and where relevant, implemented through close linkages with governmental agencies as well as with industry and private/philanthropic organizations.

It is good to learn that special attention is paid to research. However, what remains unclear is the need for NRF when already we have independent institutions like DST, DAE, DBT, ICSSR, ICHR etc. (mentioned in Clause 17.10 of NEP 2020). All these institutions have produced researches of very high quality and required no intermediary bodies to act as liaisons with government. No two research can be identical. The NRF will only lengthen the process of evaluation instead of expediting the same. Our suggestion is to do away with the idea of NRF again and vest more power both in terms of human resources and finances and also in matters of policy and decision making. The works of these highly prestigious institutions should be publicised among the stakeholders to encourage more research proposals and approval of their projects. Funding should be regularised for a seamless research experience by scholars from home and abroad. Excessive bureaucratisation should be done away with and true scholarship promoted.

In the current times, in service teachers can no longer avail research grants in the form of Major and Minor Research Projects nor avail the two year leave for completing PHD. Research atmosphere in yesteryears both in terms of registration and completing the work had been teacher/ scholar friendly. As already mentioned in an earlier paragraph, registering and pursuing research are becoming increasingly tough today due to lack of incentives. To promote the quality of research environment, obstacles to register for the programme as well as provision to finish

the programme successfully should be prioritised. NEP 2020 contradicts itself by talking about building world class research environment while severely restricting the scholars' entry to M.Phil/ Ph.D programme and doing away with the existing support structure in the form of financial aid, granting leave to the faculty and stalling funds to all research activities. We demand and suggest immediate resumption of facilities granted to research scholars, faculty and students for pursuing higher studies, so long held in abeyance.

Reforms in curriculum

The moral and value based education is one of the most important component of reforms of curriculum proposed by NEP 2020. The NEP has emphasized much on "moral and value-based education". The NEP has mentioned that all curriculum and Pedagogy from the fundamental stage onwards will be redesigned to be strongly rooted in the Indian and local context and ethos in terms of culture, traditions, heritage, customs, language, philosophy, geography, social and scientific needs etc., in order to ensure that education is maximally relevant, interesting and effective for our students. Thus, reforms involve teaching of values. It will also involve reading of the Hindu religion text including manuscripts, which will impart Vedic knowledge to the students. It seems clear that the value education will be governed by traditional ancient Indian teaching and culture, although it does not spell out the name of any religion. The traditional ancient teaching and culture comprises of multiple traditions, Vedism, Buddhism, Jainism and other ancient thoughts. If we take modern time, it will include Sikhism, Islam and Christianity.

The proposed value education is likely to be influenced by ancient Vedic or Brahminical religious teachings. For instant while referring to 'value' of Karma, it refers to "Nishkam Karma" which is the concept of karma proposed by Bhagavat Gita. The policy also refers to "inner inherent qualities" which is again a Bhagwat Gita concept which forms the basis for the Varna system that later led to the emergence of caste system. The policy further indicates that children will be taught values from the original stories of the Panchatantra, Jataka, Hitopadesha and other fables from the Indian tradition. If this is the case then the value education proposed by NEP 2020 means teaching of single religious traditions in the classroom. This goes against the spirit of the article 28(1) of Constitution which bars religious instructions in secular educational institutions.

The issue of value education based on religious teachings become a subject of intense discussion and debate by various committees including Radhakrishnan Commission of 1948 and Kothari commission of 1966. Radhakrishnan commission was the 1st to discuss the issue of moral and spiritual education and role of religious education. Later Sri Prakasa committee of 1960 on religious and moral instruction

also dealt with the issue. The report of the Kothari commission distinguished between “religious education” and “education about religions”. One more committee headed by SB Chavan of 1999 also looked into the value education. But according to article 28 (1) of the Indian constitution “no religious instruction shall be provided in any institution wholly maintained on the state funds”. The minority institutions are exempted from this provision. In the course of a discussion with regard to the Constitution, Ambedkar had brought up clarity on this issue. He distinguished between “religious instructions” and “study of religions” and stressed that it is only the former which is prohibited.

The report of Kothari commission also distinguishes between “religious education” and “education about religions”. This means that teachings and research of various religions in the development of religion and philosophical studies is necessary and essential but the preaching of a particular religion in education institution is not permitted. Thus, it is obvious that “moral and value education” has to be governed by the principles enshrined in Constitution. The moral value education should necessarily promote among students the importance of social, economic and political equality, liberty, fraternity, national unity, national integration, secularism, rights and duties of citizens. The value education should be necessarily “citizenship education” based on values contained in our Constitution and not influenced by teaching of a particular religion.

Emphasis on Sanskrit

The NEP 2020 places great emphasis on teaching of Sanskrit language making it a part of school and higher education. The policy states that “Sanskrit will be mainstreamed with strong offerings in school and connected to other contemporary and relevant subjects such as mathematics, astronomy, philosophy, linguistics, Yoga etc. Sanskrit universities too will move towards becoming large multidisciplinary institutions of higher learning. It goes on to add “Sanskrit teachers in large numbers will be professionalized across the country in mission mode through the offerings of four year integrated multi-disciplinary B Ed., dual degrees in education and Sanskrit”.

Sanskrit is emphasized to such an extent that students will have option to take Sanskrit language in place of Hindi or English, thus giving national language status to Sanskrit.

In the end of the report mentioned that “all curriculum and Pedagogy from the fundamental stage onwards will be redesigned to be strongly rooted in the Indian and local context and echoes in terms of culture, traditions, heritage, customs, Language, philosophy, ancient and contemporary knowledge, societal and scientific needs in order to ensure that education is maximally relevant, interesting and effective for our students”. The intention seems to be clear, that is to create

teachers with knowledge in Sanskrit language and Sanskrit knowledge which necessarily means the knowledge of all Hindu religious texts. Sanskrit should be taught only as one of the optional languages and not as substitute to Hindi or English. Sanskrit should be taught like any other classical language such as Pali, Parkrit, Tamil or Telugu. The replacement of either Hindi or English by Sanskrit should not be permitted in any case.

We would draw distinctions between Sanskrit as a language and Sanskrit knowledge system. The Sanskrit as language should be taught like any other optional language. Texts written in Sanskrit language in natural and social sciences may be taught in each of the discipline in the respective departments. The teachings and research of philosophy of ancient religions like Vedism, Buddhism, Jainism, Sikhism, Christianity or Islam should be optional to department of religions or department of philosophy.

1. Teaching of Hindu religion under the guise of teaching Sanskrit language would be unconstitutional.
2. The committee mentions about the teaching of Persian but excludes Arabic and Urdu. Both these languages should be included for teaching.
3. The bachelor of education degree should confine itself to educational pedagogy and should not be combined with Sanskrit as proposed by NEP 2020.

NEP 2020 and Equity and Inclusiveness.

The NEP 2020 has recognized the issue of equity and inclusiveness in higher education. For inclusiveness the NEP has identified the groups such as ST, SC, OBC, physically handicapped and women. Without addressing them separately, the policy has designated them as “Socio-economically disadvantaged groups (SEDG)”. The policy envisions ensuring equitable access to quality education to all students, with a special emphasis on SEDG. It goes on to add that “exclusion of SEDG from the education system is common across school and higher education sectors. Therefore, the approach to equality and inclusion must be common across school and higher education.

For this purpose, the NEP 2020 has proposed additional actions that are specific to higher education. It has suggested that Target should be fixed for bridging the gender gap and the gap between SEDG and other advanced groups. For this purpose, it has proposed financial assistance and scholarships to SEDG and women and has also provided support for technology tools for better participation and learning outcomes. It has suggested that higher educational institutions can charge special fee which is affordable. It expects the higher education institutions to recognize the academic need of the socially disadvantaged students and has proposed bridge course and remedial assistance in English language and in core subjects. In order to undertake these activities, the NEP has proposed two funds

- (i) Gender inclusive fund and
- (ii) Fund for socially and economically disadvantaged groups

However, NEP 2020 does not identify the problems faced by the socially and economically disadvantaged groups, women and the physically handicapped students.

The proposals are not based on the study of their problems. It offers only general suggestions. Identification of the gap in the educational attainment of different groups in terms of enrolment ratio, dropout rate and their academic and economic difficulties would have been possible, had the committee studied the actual situation. The committee could have studied the present system and programmes for these groups seriously and then suggested the remedies to strengthen the present setup.

In order to develop proper policy for equity and inclusive education, it is necessary that we get some idea about the situation of these groups, with respect to their educational attainment, the problems that they face in terms of dropout, languages, financial assistance and scholarships, and in access to admission in private educational institutions with the available data and thus placed the suggestions in the context of actual situation.

Online Education

The NEP 2020 has emphasized the need for online education for wider coverage and inclusiveness. The UGC in its guidelines has advised off-line and online in the ratio of 60:40. The UGC has proposed a blended learning program. The access to computer and internet is very low among the low-income group students. A large section of students’ population will be left out of the online program of teaching because of these drawbacks.

NEP 2020 allows online degree, simultaneous degrees which are to be treated on par with regular degrees. Online classes can never be a match for classroom teaching. Classroom teaching cannot be replaced. In the name of student centric education, NEP2020 tries to make it digital centric reducing the role of teachers. The massive online open course or MOOC are seen as a potential replacement of physical campuses. Higher education institutions are not only for students and they are also meant to be a space for teachers. They do have a responsibility to introduce students to all sources of knowledge. In 2017-2018 only 10.7% of households in the country had access to computer facility. Only 4.4% of rural population and 23.4% of urban population had access to computers.

Percentage of households with computers, sector 2017 - 2018.

Computer	Percentage access
Rural	4.4
Urban	23.4

Total	10.7
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Source NSS 2017-18

Percentage of households with computers, social group 2017 - 2018.

ST	4.5
SC	5.5
HOBC	8.7
HHC	22.0
Muslim	7.1
Buddhist	6.4
Total	10.7

Source NSS 2017-18

Percentage of households with computers, consumption quintile 2017 - 2018.

Computer	
0-20	2.4
20-40	3.6
40-60	4.7
60-80	11.9
80-100	33.7
Total	10.7

Source NSS 2017-

Percentage of Households with internet, sector 2017-18

Internet	
Rural	14.9
Urban	42.0
Total	23.8

Source NSS 2017-18

Percentage of Households with internet, social groups 2017-18

ST	12.0
SC	15.3
HOBC	21.0
HHC	41.4
Muslim	19.9
Buddhist	18.5
Total	23.8

Source NSS 2017-18

Percentage of Households with internet, consumption quintile 2017-18

Internet	
0-20	8.4
20-40	13.3
40-60	18.5
60-80	31.1
80-100	52.6
Total	23.8

Source NSS 2017-18

Disparities are obvious between various social groups. Only 4.5% of ST, 5.5% of SC, 8.7% of OBC and 22% of others own computer. At all India level only about 24% of students have access to Internet. In rural areas it is quite low with only 14.9% households and in urban area it is 42%.

The policy envisions ensuring equitable access to quality education to all students but the suggestions, like online education are quite contrary.

Educational attainment: Inequality in access to higher education

India has made considerable progress in educational attainment since Independence. The national sample survey 2017-18 on higher education gives data on enrolment rates of various economic and social groups. The educational attainment rate in higher education is measured by enrolment ratio, which is the ratio of the students in the higher educational institution in the age 18 to 23 years to of persons in that age group.

Economically weaker sections

In 2017-18 the gross enrolment ratio (GER) in higher education is about 26%. However, it varies by the income groups. The GER for the lowest income group 0 to 20% is about 13% and it progressively increases to 19% for second quintile (20 to 40%), 25.7% for third quintile, 35% for fourth (60 to 80%) and finally 53% for fifth quintile (80-100). The GER of bottom income group is four times less compared with top income group. Thus, there is clear negative relationship between the income level and educational attainment rate in higher education which shows the bias in favour of the economically advantaged groups.

GER in higher education by income groups, 2017 – 18

Income group	GER percentage
0-20	13.4
20-40	18.8
40-60	25.7
60-80	35.3
80-100	53.1

Total	26.3
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Source: NSS 2017-18.

The disparities in GER by income groups are further confirmed by variation across occupations. The GER is 14% for the casual wage labours which is 2 ½ time less compared with regular salaried workers (36%).

GER by occupations: 2017-18

Occupation	GER %
Self Employed-farmers and entrepreneurs	25.6
Regular salaried worker	36.4
Casual wage labour	14.3
Total	26.3

Source: NSS 2017-18.

Gender Disparities in GER.

The GER for female (23%) is less than male (29%) although the difference is not high, the enrolment of female is about 6% points less for female than male.

The GER is also low in rural area, (21%) compared with urban area (40%) which is almost 2 times less than urban area

Male-female GER in higher education, 2017-18

Social Groups	GER %
Rural	20.9
Urban	38.9
Gender	
Male	29.4
Female	22.9
Total	26.3

Source: NSS 2017-18

Disparities by caste and Tribes

There are obvious disparities between the caste, tribals and high castes. The enrolment of ST and SC is low compared with OBC and High caste. As against the state average of 26%, the GER is 16 for ST, 21 for SC, 28 for OBC and 41 for higher castes. Thus the GER of ST is 2 ½ times less than higher caste. The GER of OBC is higher than SC and ST but it is one and half time less than higher caste. The graded inequality between the caste groups is quite evident. The GER reduces as we move from higher caste to OBC to SC and finally to ST. Even among the casual wage labour, the GER of ST/SC (about 15%) is lower than OBC (17%) and of OBC's lower than high castes (20%)

Disparities by caste and Tribes

Social Groups	GER Percentage
ST	15.8
SC	21.2
HOBC	28.2
HHC	40.7

Source: NSS 2017-18

GER by occupational Groups, 2017-18

	Self Employed	Regular Salaried	Casual labour	Total
ST	13.1	28.2	7.3	15.8
SC	21.9	28.7	15.3	21.2
Hindu OBC	27.6	36.3	17.1	28.2
Hindu Others	36.8	47.0	20.0	40.7
Muslim	16.2	26.5	8.1	16.6
Buddhist	33.9	41.6	21.3	30.9
Total	25.6	36.4	14.3	26.3

Source: NSS 2017-18

Religious Groups

In the case of religious groups, the GER is the lowest for the Muslim (16.6%). It is lower than other minorities like Jains, Sikh, Christian and Buddhist.

Few issues emerged quite clearly on the inequality in educational attainment in higher education. The disparities persist despite policies, which indicate that there is a need to reform the present policies.

1. The low-income group's access to higher education is low despite the relatively high coverage under scholarships and freeships than higher income groups. This means that the coverage of the low-income groups through scholarship/freeship is inadequate which need to be enhanced.
2. Among the occupational groups, the casual wage labour lag behind the self-employed and regular salaried, which reinforce the importance of income in access to higher education. So, the casual wage labour group need to be the focus area.
3. Among the social groups, the ST, SC and Muslim lag behind. The main reason is low income of ST/ SC/Muslim. So, policies of financial assistance in the form of low fee, scholarships, free ships, and other are necessary.
4. The OBC's educational attainment is better than SC/ST/Muslim but lower than the higher caste. The poor among them should be covered under policies for the low income groups.

5. The SC, ST and Muslim seems to suffer from discrimination in accessing higher education. So, policies are necessary to ensure an equal and non-discriminatory access to them.
6. The household with low education of head of the household reduces the probability of their children's entry in higher education. Some policies are necessary for household whose head lack in education.
7. Large family size reduces the probability of entry of the individuals in higher education. So, some focus on the large size families is necessary.
8. High fees is the reason for low access to private unaided institutions. The institutions should have fee policy which the low income groups could afford, so that the low income groups who come on their merit should not be forced to leave.
9. Low coverage through scholarships and free ships is also a reason for low access to private unaided institutions, this is particularly the case for the students from the scheduled caste. The private unaided institution should have some policy with focus on SC.
10. The dropout rate among the low income group and ST/ SC is high, mainly due to economic constraints. Some policy would be necessary to provide financial assistance.
11. The dropout among the female students is also relatively high due to their domestic engagement. Some scheme should be devised for them to reduce domestic engagement.
12. There is a vast difference in GER between rural and urban. This is mainly due to access and lack of education of parents. Therefore some steps should be taken to provide easy access to rural students.

The NEET- CUET phenomenon

We perceive NEET- CUET policy provisions as a phenomenon and not as an isolated freak policy provision. NEET is just the tip of the iceberg. Under NEP2020, national testing agency (NTA) has been constituted which would conduct not only NEET but is designed to take over a whole spectrum of prevailing state/union territory level entrance tests.

NEET: A conspiracy against level playing field

It is in the frame work of the trinity of equality, liberty and fraternity, as elaborated by Dr. Ambedkar, that we are now in a position to examine the much – hyped but baseless and farcical claims of both the central government and the NTA that NEET as well as CUET are aimed at providing level playing field to all the aspirants. Before the imposition of NEET in the year 2016 -2017 academic year, admissions in the UG medical courses were based on the marks procured in the senior secondary plus 2 examination conducted by the state board of Senior/Higher secondary education (or) on the basis of state level test conducted by the

respective state. The state board's curriculum and syllabus was common for all government and government aided schools as well. In this system, level playing field was essentially available for students in both the urban and rural government schools and those studying in remote tribal schools as well. It also held true for students drawn from various religions and caste backgrounds and for both boys and girls in each social category. Thus, there was reasonable space in the education system for the inherent diversity in society, without adversely affecting the prevailing equality, justice, liberty and fraternity. Even in private schools, there was no corporate-driven expensive coaching to discriminate between the middle class students and those from the affluent class, as became the practice after NEET. In the post – NEET period, the aforesaid existing level playing field was rapidly dismantled as a conspiracy to exclude the impoverished, particularly the Bihajans and girls, from the UG medical courses.

Justice Dr AK Rajan committee formed by Tamil Nadu government records that NEET has become a cause for the raising culture of coaching as opposed to learning. Students have to pay a hefty fee for private coaching to get prepared for the NEET which only the affluent and rich people could afford to. Such negative consequences have already discouraged and prevented the most vulnerable communities like socially depressed and backward, educationally and geographically backward and those who studied in government schools, who enjoyed so far at least a little Number of enrolments, though disproportionate, before NEET.

NEET has caused an unprecedented havoc and setbacks for the students of different social, economic and demographic denominations aspiring for medical studies. As long as there is inequality in the school system, NEET/CUET-like centralized pro upper class/caste and patriarchal filters will increase their inherent inequality. It is the constitutional duty of the state to ensure that the doors of higher and professional/technical education are not closed to the children/adolescents/youth of such communities by forcing them to go through a uniform pro-elite and hegemonic filtration mechanism like NEET/CUET.

The exclusionary, inequalizing dimensions of the mandatory centrally administered entrance examination is too obvious to need elaboration. With centrally administered tests becoming mandatory for entire range of higher educational institutions, we will see coaching completely replacing education and full-scale commercialization and degeneration of education. Higher education becomes the preserve of the rich and the privileged edging out the vast majority of our already deprived sections.

NEET-CUET: Assault on India's Federal Character

Article 1 (1) of the constitution states “ India, that is Bharat, shall be a Union of States”. The wide ranging and crucial implication of this vision of the constitution were deliberated upon by Dr. Ambedkar on 25 th November 1949 in his historic

speech while presenting the constitution to the constituent assembly in the following words :

“.....As to the relation between the centre and the states, it is necessary to bear in mind the fundamental principle of Federalism is that the legislative and executive authority is partitioned between the centre and the states not by any law to be made by the centre but by the constitution itself . The states under our constitution are in no way dependent upon the centre for their legislative or executive authority. The centre and the states are co-equal in this matter. This is the principle embodied in our constitution . There can be no mistake about it. It is , therefore, wrong to say that the states have been placed under the centre. Centre can not by its own will alter the boundary of the partition. Nor can the judiciary .”

Given the above background , the Justice Dr.A.K. Rajan committee constituted by the Government of Tamilnadu made the following recommendations :

- a) The state Government may take a stand that the words ‘ University Education’ found in Entry 25, List III is a ‘general’ provision and ‘Regulation of Universities’ in List II is a ‘special’ provision: Entry 32 is an exclusive state subject, that cannot be ignored. Therefore Article 254 cannot be invoked to override an Act enacted by the state insofar as it relates to Entry 32.
- b) The state Government may pass an act indicating the need for the elimination of NEET at all levels of medical education and get the President’s assent for the same . This will ensure social justice and protect all vulnerable student communities from being discriminated in admission to medical education programmes.
- c) The HSC (Higher secondary) scores shall become the sole admission criteria for admission to First Degree medical programmes and that to ensure equality in opportunity to students from different Boards of Education, normalisation of scores may be followed.

NEET – CUET Phenomenon: Enslavement of mind

The centralised tests like NEET-CUET are lobbied for by the Edu-Tech companies since these provisions open huge awesome business through both coaching classes and computer based testing (CBT). From ECCE to professional and Technical education, India’s education business has received in the past couple of years rapidly bouncing investment from the global capital, essentially replacing public – funded and time tested bodies like NCERT and SCERT / DIET in curricular and pedagogic planning and dictating terms to the spectrum of agencies constituted under the banner of NEP 2020.

The rising control of global capital on India’s education has dangerous implications for our freedom from imperialism for which we fought against the British Empire for more than a century during which thousands of our youth were martyred. The mind of the youth from the upper class / caste , selected through NEET – CUET would be enslaved in order to ensure that they readily shift their

social and professional base from India to the Silicon Valley or NASA or be recruited by Corporate hospitals in paris, LosAngels or else were in the western metros

Privatization, centralisation and Commercialization

The National Education Policy (NEP) 2020 is in line with the neo-liberal, anti-democratic, and centralising tendencies. It is actually a blueprint of privatization and centralisation of education sector. It is in consonance with the World Bank policies which promote the withdrawal of public funding from education and encourage private participation. In 2000, during the term of NDA I, the Policy Framework for Reforms in Education (PFRE), drafted by Mukesh Ambani and Kumarmangalam Birla, advocated foreign direct investment in higher education and also initiated the idea of private universities. The reflection of the Ambani-Birla document, which was widely criticized at that time, is clearly visible in the NEP of 2020. Many of its recommendations find a place here, including private universities, market oriented education, “user pays” principle and opening up to FDI in the education sector. Its main thrust is on privatization and corporatization of education sector.

In NEP 2020, the term “Public Philanthropic Partnership” is the euphemism that masks the encouragement of private capital in education. The use of the term “public-spirited philanthropic HEIs” to refer to private investments seems ironic in an age when education has been commoditised, and is part of the General Agreement on Trade in Services (GATS).

The intention of NEP 2020 is stated clearly – to “encourage and facilitate” private interests in education. Between 2014-15 and 2018-19, private universities have accounted for a whopping 55% of the increase in university enrolment. The NEP opens the door for further extensive privatization, including schools run by so-called “true philanthropic institutions (8.4).” NEP also provides for “alternate models of education” (Para 3.6), creating space for Sangh Parivar or affiliated organizations. NEP allows relaxations on inputs and self-regulation to all non-governmental schools (8.5). All this will inevitably undermine the public education system.

Needless to say, privatization of the education system would rob the poor and marginalized community of their Right to Education as envisaged under the Constitution of India and would make education a privilege accessible only by the rich and urban middle class students.

In the garb of promoting new-age and liberal education, the NEP advances privatisation and centralisation in the system. The NEP comes across as an evangelist for privatisation, although the text of the policy repeatedly conceals the word “private” under the guise of the expressions “philanthropic private” and public-spirited private”.

NEP 2020 Sec. 18.14. states that private HEIs having a philanthropic and public-spirited intent will be encouraged through a progressive regime of fees determination. The expression 'philanthropic private' here can be read as the espousal of "new philanthropy" or "philanthrocapitalism". Actually philanthrocapitalism rests on the claim that there is no conflict between the market and the common good. Therefore, the market should be extended to the services that were earlier provided by the state.

While the policy makes a distinction between Private for profit and philanthropic private, nowhere does it explain how to discern between the two. How does one traverse through the zone of intentions to find out if the private is existing for profit or for public good remains unclear. Similar benign tone can be captured through its introduction of Public Philanthropic Partnership (PPP) term, instead of the earlier much criticized Public Private Partnership.

Regulatory system of Higher Education

NEP 2020 states that the regulatory system is in need of a complete overhaul in order to re-energize the higher education sector and enable it to thrive. It further states that to address the issues of heavy concentrations of power within a few bodies, conflicts of interest among these bodies and a resulting lack of accountability, the regulatory system of higher education will ensure that the distinct functions of regulation, accreditation, funding and academic standard setting will be performed by distinct, independent and empowered bodies. It goes on to add that this is considered essential to create checks and balances in the system, minimize conflicts of interest and eliminate concentration of power. Accordingly, four structures will be set up as four independent verticals within one umbrella institution, the higher education commission of India (HECI).

The first vertical of HECI will be National higher education regulatory council (NHERC). This will function as the common single point regulator for the higher education sector including teacher education and excluding medical and legal education. NHERC will be set up to regulate in a "light but tight" and facilitative manner. A few important matters particularly financial probity, good governance and the full online and off-line public self-disclosure of all finances, audits, procedures, infrastructure, faculty/staff, Courses and educational outcome will be very effectively regulated.

The second vertical of HECI will be a meta-accreditation body called National accreditation council (NAC). In a short term, a robust system of graded accreditation shall be established which will specify phased benchmark for all HEIs to achieve set levels of quality, self-governance and autonomy. In turn all HEIs will aim to attain the highest level of accreditation over the next 15 years and thereby eventually aim to function as self-governing degree granting institutions/clusters.

The third vertical of HECI will be the Higher education grants council (HEGC) which will carry out funding and financing of higher education based on transparent criteria, including institutional development plans (IDPs) prepared by the institution. HEGC will be entrusted with the disbursement of scholarships and developmental funds for launching new focus areas.

The fourth vertical of HECI will be the general education council (GEC) which will frame expected learning outcomes for higher education programs, also referred to as “graduate attributes”. National higher education qualifications framework (NHEQF) formulated by GEC shall be in sync with the national skills qualification framework (NSQF) to ease the integration of vocational education into higher education. Higher education qualification leading to a degree/diploma/certificate shall be described by NHEQF. In addition, the GEC shall set up facilitative norms for issues such as credit transfer, equivalence etc., through NHEQF.

NEP2020 further states that all HEIs public and private shall be treated on par within this regulatory regime. There will be a common minimal national guidelines for all legislative acts that will form private HEIs. The private HEIs will be encouraged through a progressive regime of fee discrimination. This will empower private HEIs to set fees for their programme independently, though within the laid out norms and the broad applicable regulatory mechanism.

According to NEP2020, HEIs upon receiving the appropriate graded accreditations, a board of governors (BOG) shall be established consisting of a group of highly qualified, competent and dedicated individuals. BOG of an institution will be empowered to govern the institution free of any external interference, make all appointments including the top head of the institutions and take all decisions regarding governance. New members of the board shall be identified by an expert committee appointed by the board and the selection of new members shall be carried out by the board itself.

Entrusting the responsibility of governing the entire higher education with one small umbrella organization HECI is nothing but the centralization of powers with one body which is against the spirit of federal nature of our country. In the process, more than 10 existing regulatory bodies like UGC, AICTE etc., will be subsumed. In the name of curbing commercialization of education, the NEP 2020 proposed that all HEIs public and private shall be treated on par in respect of regulation. If public and private institutions are treated on par, there is every danger that slowly public institutions will also run like private institutions. Giving free hand to fix fees in private institutions will certainly commercialize the entire higher education. Administration of HEIs by board of governors, which itself nominate its members, will lead to corporatization of HEI. Giving powers to BOG to make all appointments including the head of the institution and take all decisions regarding governance free of any external interference is in the total contradiction with the existing regulations with the regulatory provisions of screening/Selection committees for making appointments.

The procedure of selection committees which includes experts brought, to some extent transparency and quality in the appointments.

Financing

NEP 2020 admits that the public expenditure on education in India has not come close to the recommended level of 6% of GDP, as envisaged in 1968 policy, reiterated in the policy of 1986 and which was reaffirmed in 1992 review of the policy. It further says that the current public (Government – Centre and state) expenditure on education in India has been around 4.43% of GDP and only around 10% of the total government spending towards education (economic survey 2017-18). These numbers are far less than most developed and developing countries. It goes on to add that this is considered extremely crucial for achieving the high quality and equitable public education system that is truly needed for India's future economic, social, cultural, intellectual and technological process and growth. The committee mentioned that the target is to reach 6% of GDP at the earliest and to reach 20% of all expenditure over a 10 year period. The target for higher education is about 2%.

The recommendation about the financial commitment is the weakest part of the national education policy 2020. The reference to target of 6% of GDP has become the ritual of all earlier attempts as well as on this policy. The Kothari commission had fixed this target to be realized by 1986/87. This was based on the estimate by the subgroup of financing of higher education. Each and every committee after that has repeated the target of 6% of GDP but unfortunately no progress has been made.

In the 11th plan 2007-2012 the ministry placed the target of 15% GER, net increase of 5% over 10% in 2007. The estimate was made by calculating the financial requirement of 5% net increase in enrolment rate by using proper statistical method. The UGC had come with Rs.50,000 crores. The ministry was surprised over the additional requirement. But the UPA government was keen on strengthening the higher education system and so increased the budget allocation to UGC from Rs.4000, crores to Rs.47000 crores (eleven-time increase) by charging 2% cess on income tax. Hence the 11th plan was called “education plan”.

The NEP 2020 has fixed the target of 50% GER by 2035 which means a net increase of about 25% point over 2020. Has the NEP made a systematic financial estimate to achieve the target of about 25% increase in GER from 2020 to 2035?. It means an increase of 1.7% on an annual basis. We do not see any such estimate made by the committee.

The goal of 6% of GDP by Kothari commission was expected to be realized in 1986/87. But this goal was never realized. Now we need a new estimate to realize the present target of 25%-point increase in GER along with quality and

inclusiveness. Therefore, it is necessary that the government should set up yet another committee to estimate the financial requirement to achieve the goal of 50% GER in 2035.

RECOMMENDATIONS

1. The affiliating system has an important advantage in the Indian context as it is easy to get admission at an affordable cost. These affiliated colleges are spread wide in all geographical region so that students in any part of the country will have easy access to higher education. The idea of proposed unitary/cluster universities located in distant places with UG, PG and PhD programmes may reduce the easy access to the students from rural area, hill area and small towns. Therefore while retaining the affiliating system more number of public funded HEIs be set up considering the educational requirements of deprived regions. They need to be nurtured with required funding, special educational packages to be provided to HEIs in remote rural, tribal, hilly areas to create level playing field by equipping them with computer network accessibility and other ICT tools to bridge the digital divide among higher HEIs. Consolidation through clusters and mergers and sharing of resources cannot be alternative to financial support for weaker HEIs to strengthen and expand their existing capacities.
2. The existing HEIs are set up as per Perspective plans of the universities, approved by State legislatures, considering the educational requirements of deprived regions. They need to be nurtured with required funding, special educational packages to be provided to HEIs in remote rural, tribal, hilly areas to create level playing field by equipping them with computer network accessibility and other ICT tools to bridge the digital divide among higher HEIs. Consolidation through clusters and mergers and sharing of resources cannot be alternative to financial support for weaker HEIs to strengthen and expand their existing capacities.
3. The NEP does not give definite reasons for three and four year duration of bachelor degree. The proposed bachelor degree of three-year duration and four year duration and Master degree of one-year duration and two year duration for obvious reasons will create gradation and the hierarchy in bachelor and Master degree. It may affect the students in employment and other matters. The employer may prefer the graduate students with four-year duration compared with three years duration. So, bachelor/master degree with multiple durations may turn out to be discriminatory to the students with a three-year bachelor and two year Master. Besides the increase in duration of UG from 3 to 4 years will affect the economically weaker section of the society more because of the higher education cost. The NEP mentions that the four

year UG is proposed for the convenience of the students who want to pursue Master's degree program in foreign universities like USA. However, this is not a reasonable justification for four-year graduation. Hence the three-year bachelor degree should be retained and who want to pursue Master's degree in foreign universities may do so after doing one-year preparatory course work. Vast majority of students should not be penalized by making the bachelor degree expensive by adding one more year.

4. The NEP 2020 discourages students from continuing their higher education by imposing a brake system *ie.*, certificate after completing one year in a discipline including vocational and professional areas or a diploma after two years of study or a bachelor degree after a three-year programme. The plot behind it is that by imposing a break in studies, the policy pushes to downward skilling from their original desire for upward skilling, which only the completion of their studies would fetch them, and also becomes the "pathway" for increasing the number of dropouts. Answer to this question lies in the framework ability to cater inter generational skills mobility from the descent based ones to the modern skill that contribute to the 21st century production. This will happen only when the educational system and its framework facilitate students to complete their choices of study instead of forcefully kicking them out halfway through. The framework will undeniably widen the skill gap between the socially elite and the socially backward and the latter will be forced to remain in the jurisdiction of their traditional occupation without any upward mobility. Therefore, the brake system/multiple exit options during the degree program should be dropped altogether.
5. Data based regional studies have to be carried out to understand the local needs, especially in the matter of network availability and the extent of digital divide. Adequate Budgetary provision has to be made for creating the additional infrastructure required for bridging digital gaps that are starkly seen in above tables.
6. As per the article 28(1) of the Indian constitution no religious instruction shall be provided in any educational institutions wholly maintained out of state funds. The minority institutions are exempted from this provision. Dr Ambedkar distinguished between "religious instruction" and "study of religions" and stressed that it is only the former, which is prohibited. The Kothari commission also distinguished between religious education and education about religions. This means that the teaching and research of various religions in the Department of religious studies or religion and philosophical studies is necessary and essential but the teaching or preaching of a particular religion in education institution is not permitted. Thus, it is obvious that "moral and value education" has to be governed by the principles enshrined in Constitution. The moral and value education should necessarily

promote among students the importance of equality (social, economic and political) liberty, fraternity, national unity, national integration, secularism, rights and duties of citizen. Education should be necessarily “citizenship education” based on values obtained in our Constitution and not influenced by teachings of a particular religion.

7. The NEP2020 emphasize not only on the learning of Sanskrit language, but also to make it a substitute for Hindi and/or English. The intention is to create teachers with knowledge in Sanskrit language which necessarily means the knowledge of all Hindu religious texts. Sanskrit should be taught only as one of the optional languages and not as substitute to Hindi and/or English. Sanskrit should be taught like any other classical language such as Pali, Tamil or Telugu. The replacement of either Hindi or English by Sanskrit should not be permitted in any case.
8. The policy should be developed to enforce all private schools aided and unaided to resort to teaching in local languages along with compulsory learning of English as one of the languages. The state governments should take special initiatives for the creation of resource material and textbooks. The resource material should be prepared in local languages on a large scale and similarly the program for the translation of English textbooks should be launched on the large scale.
9. The system of tenure track is a system which is borrowed from Western universities. Present system of appointment and promotion was developed with intensive exercise done in 2009 by UGC as part of the sixth pay commission and amended in seventh pay commission further improve the process of appointment and promotion of teachers including the qualification framework. Hence there is no case for any change in the present system of appointments. At the same time, NEP 2020 is silent on the critical issue of scarcity in number of teachers in the state public universities and colleges in the states. Non-appointment of regular teachers in vacant positions has affected the quality of teaching in the country. We have to find a permanent solution to this perpetual problem. To address this serious issue the estimation of shortage of faculty should be done by taking teacher student ratio prescribed by the UGC and then a medium-term plans should be developed by allocating resources for the appointments. The Central government should also supplement the expenditure by contribution of funds for at least 10 years through transfer under finance commission and other channels. Despite emphasis on quality the NEP 2020 has bypassed the issue simply because it has not studied the issue of shortage of faculty in public universities and colleges.

10. The low income groups access to higher education is low due to the inadequate scholarships/freeships. Among the occupational groups, the casual wage labour lag behind the self employed and regular salaried which reinforce the importance of income in access to higher education. Among the social groups the ST, SC and Muslim lag behind, low income of SC/ST/Muslim is the main reason. The SC/ST and Muslim seems to suffer from discrimination in accessing higher education. So policies are necessary to ensure an equal and non-discriminatory access to them. The household with low education of head of the household reduces the probability of their children's entry in higher education. Large family size reduces the probability of entry of the individuals in higher education. So, focus on the large size family is necessary. The dropout rate among the low-income group and SC/ST is high mainly due to economic constraints. The dropout among female students is also relatively high due to their domestic engagements. Though the OBCs educational attainment in is better than SC/ST/Muslims, it is lower than the high castes. The poor among the OBCs should be covered under policies for the low income groups. Special micro level policies to address these above said issues should be devised by the central/state governments and implement them in a fixed timeframe. In between continuous studies should be made to improve the system in place. Without addressing the issues faced by the disadvantaged groups individually in microlevel, the estimated goal of GER cannot be achieved.
11. A simple overarching, micro-managed NEP for a country of immense social, cultural, linguistic, developmental and historical diversity is totally unacceptable. No developed country in the world with federal or unitary form of government has such a centralized education policy. In fact, education is the most decentralized area of governance anywhere in the world. The NEP2020 is premised on a complete denial of federal rights of states and an acute insufferable centralization of the entire universe of education from preschool to universities and research institutes. It needs to be recalled that education, which was in the state list in the Constitution was transferred to concurrent list during emergency in 1976. The NEP2020 instead of accepting the legitimate federal concern has resorted to a virtual transfer of education from concurrent to central list. The state governments would have no say in curricular, regulatory, admission, evaluating or certifying matters. Such a violation of the federal structure, which is the basic feature of the Constitution cannot be permitted. The NEET/CUET exams which make the school learning certificate examinations conducted by state totally reductant is a classic example for the anti-federal policies. Hence education must be restored back to state list from the concurrent list.
12. As far as the regulatory measures are concerned, a country with 1113 universities, 43796 colleges, 11296 standalone institutes, with a gross enrolment of 4.14 crore students (source: all India survey on higher education

2020-2021), decentralization of powers to subject/function specific bodies are very much needed. Contrary to this NEP2020 proposed a single and small overarching body to regulate the entire function in the name of Higher education commission of India (HECI) with four verticals. In the process, more than 10 academic bodies like UGC, AICTE, ICAR are to be subsumed. The ever growing students enrolment and the complexities of issues to be resolved, We suggest that the existing bodies not only should be retained, but also they should be modernized and improved with more teeth for effective functioning. NEP 2020 proposal of centralization of power is a retrograde step.

13. The NEP2020 itself says that the expenditure on education has been around 4.43% as against the minimum demand of 6% of GDP. In fact the expenditure by the central government on education is only 2.8/2.9% during the period 2017 - 2022 (source: budget highlights 2023-24). Leading economists suggest that an additional 10% of GDP is required to spend on the five fundamental, universally “justifiable” economic rights - the right to Food, right to employment, right to universal health care, right to free, quality universal education, right to old age and disability pensions. They also suggest that this can be raised by having a small percentage of wealth tax (2%) and inheritance tax on the top 1% of the population. These proposals can be seriously considered by the government of India to meet the required expenditure on education.

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