SNo	Chapter No.	Section No.	Page No.	Excerpts from Draft National Education Policy	Concerns/Inferences
Our inference	Our inferences	Our inferences	Our inferen	Our inferences mainly based on our work with Out of Sch	Our inferences mainly based on our work with Out of School Children in Bangalore, Karnataka
Field Workers: Mohan Raj K, Indu Priya					
Compiled By: Indu Priya					
Organization Name: Payanmaram Trust					
				On Consultations	
				Consultations processes of the draft NEP policy	(A) The consultation process did not plan sufficient venues when it comes to reaching out to public in a non-digital manner. (B) UN Convetion of the Rights of the Child, signed and ratified by India, required children's participation in matters that concern them. Their feedback has not been taken in the review process. Nor have any child friendly material elaborating NEP made available for their review and feedback. Indian culture will make us question the validity of a child's opinion. But, time and again, children have given valuable feedback to us when we spoke to them - be it on giving them their mother tongue, a commute to school by school bus, need for English Teachers, quality clothing for their uniform, reduction in number of lessons in a year, unfair mandate of third language in board exams for recent tamil migrant to karnataka to name a few. Children have been wonderful at thinking about their problems many times. (B) The consultation also does not seem to have included all the student organizations (partisan and non-partisan) in colleges across various States who have time and again proactively debated on vital issues surround their education system.
				Early Childhood Educatrion and Care (ECCE)	

PNEP_001	Chapter 1	P1.2.	Pg 50	Significant expansion and strengthening of facilities for early childhood education....	(A) The draft talks about instructional material for them and continued health and nutrition support by Anganwadi/ICDS (B) No **STRONG COMMITMENT on admission of 0-3 year old children or daycares especially for that age range**. This has also been a particular ask by social workers working with Out of School Children and needs serious reconsideration, prioritization and budgeting. (C) **Will Co-locating Anganwadis mean co-locating AWC-cum-creches/Rajiv Gandhi Creche Schemes** for working woman, considering its great potential to fix Dropouts due to Sibling Care Issues? (D) If yes, how will this demand from community, interested persons or social workers (Government and non-government) **be ensured and tracked**, both technologically and on paper? (E) <u>**Our Analysis on sibling care:**</u> Juvenile Justice Act and present Anganwadi setups do not fulfil URG mother's needs completely. The **JJ Act no longer encourages institutionalization of 0-6 year old children. In case of inability to take care of child and with no on-time or time bound options of alternate financial support provided to mothers** or atleast no information revealed, mothers often (a) turn up to the older kids for support (b) even pushed into sex work (c) suggested to give in adoption (JJ Act) For such mothers, there is anyway no question of **working as empowerment.** Cases of negligence, depression, lack of seriousness in child care or child's education etc is adding to the problems and can be SSA's social workers and counsellors task. It's great potential for woman empowerment is clearly seen in Garments industry which supported daycares in their workplaces. Contruction workers, domestic workers and many else are yet to expereince it. It must be noted that elite empowered women have access to it on payment. (F) Thanks: **Moving 3-6 children into school complexes is a long sought dream of social workers.**

PNEP_002	Chapter 1	P1.4.	Pg 52	Design of learning-friendly environments	Unlike elite ECCE facilities, "safe", does not mean a commitment on the **Installation of CCTVs** in the EECE learning environments. (a) The entire document has not discussed CCTV nor sharing live feeds with parents. We have faced frequent cases of severe punishments and abuse of little children in Anganwadis and see that it is very important. There is also an event of a KV school staff transferred to a different KV school despite a POCSO case on him. (b) Currently, despite inspections by statutory bodies, safety hasn't been ensured due to sympathy towards peers or corruption or official delays, understaffing etc. Considering all these fallacies of current Monitoring Mechanisms, we have come to believe that the duty of Monitoring should be on all parents (not even only with the parents/mother's committee which has also become nothing but a silent bystanders most places) (c) In cases of abuse, a pre-schooler is often not able to give a statement. Often, in adoption centers, social workers observe sexually explicit behaviour displayed by abused preschoolers who have been victims of sexual abuse long after such episodes. To expect any strong proof or medical evidences everytime to charge an abuser is difficult. Presence of CCTVs can help greatly and if the elite are recommended these, the GoI should take steps in this direction for Government schools as well.

| PNEP_003 | Chapter 1 | P1.4. | Pg 52 | Design of learning-friendly environments | **No IT-Based Reporting mechanisms** (like Namma Chennai or BBMP Sahaya) for issues on ECCE, Education or related problems. It is not sufficiently prioritized nor invested in either. **Section P8.1.3.** discusses SSRA, an independent quasi-judicial regulatory body giving a public grievance redressal mechanism, which isn't even IT-based which means it is simply prone to failure in a highly corrupt system like this. And we believe that the presence of a robust IT based, time bound,acknowledgement driven portal for all general public will minimize the roles and need of SSRA or such considerably and will perform much better. **Section P7.7.4.** talks about a **IT-based grievance logging** system/Mobile App **only for SMCs** with specific timeline based escalation up the hierarchy of the State education system. **THIS NEEDS TO BE EXTENDED TO ALL GENERAL PUBLIC** (since that will include all parents, interested citizens and any non-government social worker too)**.**
 Even in private institutions PTAs aren't voicing since they by default feel threatened to report issues while their children are under the care of the institution and its management. And many SMC/SDMC members do not even know they are part of it or are many times the voice of the administration. Information about these should be incorporated in **school diaries with scan codes to elaborate the issue to illiterates in addition to Parent's meetings on convenient days for these parents**. The onus of proving a grievance wrong will be with the administration/Department if they deny the allegation. Ex OOSC child's presence in school or such must be proved through CCTV footages/pictures. The system must ensure levy of penalties wherever the action fails to proceed further. **Such a system must be able to cut across departments, for example, in case of a grievances of delayed financial assistance, it should show the delays in receiving funds from even the highest authorities (Center/State) in its tracking mechanism.** A independent toll-free helpline should also help people register their grievances. The information about these widely displayed in their Name Boards. |

PNEP_004	Chapter 1	P1.6.	Pg 52	National ECCE Policy Framework (2013)	The National ECCE Policy Framework talks about Multilinguism in two or three language context - **MOTHER TONGUE-Local Language-English** for **preschool education**. It is noted that the **draft policy agrees with the same** with respect to ECCE. However, in the draft, the same understanding **does not seem to reflect for children in the Primary, Secondary or other levels. Our studies on OOSC children too agrees with the importance on focussing on MOTHER LANGUAGE of the child in addition to ENGLISH, considering evident globalisation.** And for protecting languages and traditions, it is **very important to keep the importance of languages in their home states** in all possible ways. Since 2013 (since National ECCE Policy), such a multilinguism **even in ANGANWADI levels with particular emphasis on <u>MOTHER TONGUE is not a reality</u> in our work areas** predominant in Tamil, Telugu, Bangla and Hindi populations in Bengaluru, Karnataka. <u>Such being the case, an investment in making compulsory many other unrelated languages of the child seems unnecessary and biased.</u> Especially, the important literature in sanskrit can be shared with all in their regional tongues. It is not necessary to insist that they learn a language other than their mother tongue, simply because it has great significance attached to it. **Considering current pressures on drop-outs, it is very important to prioritize mother tongue and English.**	
PNEP_005	Chapter 1	P1.6.	Pg 52	Instituting an effective and quality regulatory system for ECCE	We do not believe any mechanism or monitoring bodies or accreditation is going to help achieve success in our corrupt institutions. There has always been complacency and sympathy towards teaching/administrative personnel by their monitoring personnel. And considering that these children are mostly URGs, the redressal of their grievances is absolutely poor and most times unconcerned. With corruption within the department, the problem only magnifies for a URG child. **"All" Public Participation is hence the key**. Not *seeming public participation* in the name of *select committees*. Time and Again, these committees have been mouthpieces of the administration/authority more than that of people. And to hand the duty to all parents and citizens and not a select favourable ones is important. As requested in PNEP_002, we will recommend installation of CCTVs as an important security measure in addition to security personnel. Be it Attendance of teachers to safety, their presence in itself can bring greater discipline and relief. It is also interesting to note that a technologically advanced way of filing grievances, tracking it, escalating it when necessary isn't available in the hands of NGOs, social workers or parents. See PNEP_003 on the same.	
PNEP_006	Chapter 1	P1.8.	Pg 53	Extension of the RTE Act to include early childhood education	Extention of RTE Act is mentioned here to address the concerns expressed by us in PNEP_001 through PNEP_003 has been mentioned in the Policy. **The one for 3-6 ages is a very welcome move.** There is a mention of a detailed plan outlining by MWCD, MHFW and MHRD together, but not much hints on what to expect in such matters is present in the current policy. So we aren't able to brainstorm more on the same and its impact on "sibling care dropouts". The current proposition of increasing age upto 18 is not sanctioned under **Child Labour Act**, which allows employment of children of 14 and above years of age. The impacts on the same is not discussed in the policy.	

PNEP_007	Chapter 1	P1.2.	Pg 51	Because of the multi-level, play-based nature of the curriculum and pedagogy framework for early childhood education in the age range **3-8 years**, no hard separation of ages in this range would be required for Anganwadis and pre-schools (including when they are co-located with primary schools), except as needed for social reasons or due to limitations of institutional infrastructure.	*No physical separation of ages 6-8, that is I to III* is already happening in Nali Kali in Karnataka. Does this *point in draft* mean Preschoolers will be accomodated along (ages 0-8) in a single class if required with no time bound effort on infrastructural addition? What "social reasons or other reasons" for limitations has been referred to here?
PNEP_008	**Sibling care Dropouts or Children with Special Needs, CWSN (including children with Moderate Mental Disabilities (IQs less than 60))** NOT DEALT				In case, of "sibling care dropouts" or "CWSN" where schools lack sufficient infrastructure to co-locate Anganwadis/Preschools, will there be plans of a safe, escorted, exclusive COMMUTE, in case of school complex based planning is also not clear in this section.
PNEP_009	**State/National Commission for Protection of Child Rights (NCPCR/SCPCR) and their roles in Education is no longer clear**				Considering plans for another quasi-judicial regulatory body the roles of SCPCRs or NCPCRs in education is not clear. Even earlier statutory body did not see great success and was mostly a powerless body, understaffed and not worthy if we weren't well connected.
PNEP_010					
PNEP_011	Chapter 2	P2.1.	Pg 58	Expansion of midday meal programme	It is a **welcome move** to include a breakfast for children, currently practiced in Karnataka. The Policy also acknowledges the fact that many children rely on **one mid-day meal for their survival**. Which shows the **vitality of sufficient nutrition** for the child. Considering the state of affairs in Karnataka, it is necessary that the Policy mentions egg as an important addition. The nutritional benefits in terms of the protein, what the egg provides is vital and children must not be denied access to the same simply because the meal provider like Akshaya Patra is vegetarian by choice. While we respect their choices, the department must plan for alternate local providers for eggs which could also contribute to community/woman empowerment. Local farmers/poultry farmers can be encouraged whereever possible thus empowering the community with/without the help of concerned departments.
PNEP_012	Chapter 2	P2.1.	Pg 58	Maintenance of databases	Section P6.1.5. promises the maintenance of a database for each child. Such a database made available **must contain the Health Needs and updates of the child** as well. Such data should be **available to the parent**. It has been promised to be available on the department website and in public domain, which is welcome.

PNEP_013	Chapter 2	P2.2.	Pg 61	**Encouragement of large-scale community and volunteer involvement:** Qualified volunteers (such as retired teachers and army officers, excellent students from neighboring schools, and passionate socially-conscious college graduates from across the country) will also be drawn on a large scale to join the NTP and the RIAP on an unpaid basis, during the academic year as well as in the summer, as a service to their communities and to the country.	The idea of appointment of unpaid IAs by the Draft NEP is **not a welcome move**. Any teaching activity should not be dependent on volunteers. Volunteers, especially unpaid volunteers need not have a commitment towards the assignment. Also, **it will encourage the Department to prefer Unpaid IAs (like current charity initiatives)**, thus compromising on the quality of help available to the child. IAs need to be trained and assessed sufficiently and with the necessary evidence, classroom demos, one-to-one demos and live interviews. The local IAs can be given a stipend based Education/BEd training to empower them. These Instructional Aides must report to a Mentor Teacher as prescribed for BEd Interns and the accountability of lapses in Basic Foundational Literacy will lie on the Aide, the Mentor Teacher, upwards till the highest authorities, each of whom will have a **considerable boost in their appraisals in case of a successful case of mentoring a child who with very good evidence** (video/NGO reports/third-party or parent reports) **lacks Basic Foundational Literacy expected of his/her age**. While in school, these IAs must assist the Mentor Teachers whereas the primary instruction comes from these Mentor Teachers. On "passionate socially-conscious college graduates" as IAs, *Many times, being a good person is not enough. It requires the necessary skill*. **Teacher resource allocations for such Bridge Programmes will be compromised in case of allowing the options of unpaid alternatives, we suspect, considering corruption and lack of will.**

| PNEP_014 | Chapter 2 | P2.9 | Pg 61 | Adaptive Assessments (Also read P4.9.3.)? Census Examinations (Also read P4.9.4.)? and the possible alternatives we propose | Tests should not demoralize children (even teachers). Many children dropout due to insults faced after a loss in their exams and fear exams. Also when their foundational literacy levels are poor, they try to avoid it and drop out. Any regular assessment should translate into an IEP (Individual Education Plan) or its revision without these pressures on the child. The IEP needs to talk about the strengths of a child more and only talk about what the child needs to focus on to become stronger (note, not strong) in those other subjects or areas and his confusions as reflected from his answers.

A strong conviction in understanding student depression and motivations towards dropping out and coming up with an assessment practice in consultation with teachers and educationists must really help here. Here is a method which impressed us.

"A Self-Correcting Approach to Multiple Choice Tests" By Joann M. Montepare [Observer][2005] suggests a beautiful approach where she keeps a copy of the answersheet and allows correction of the answers by children. Next day, for every correct answer, she gives full credit, every corrected answer, half credit and wrong or uncorrected answer, no credit. Three such tests, where the first two are with self-correction and the last one without, she says. She finds children welcoming it- kids of the top grades finding themselves understanding subjects more deeply and the ones with lesser grades feel less anxious to the ideas of test and their shortcomings. Thus children see the tests as being a tool for self-learning and also it is a great morality lesson.

Adaptive tests seem to lack this upsides presented by "Self-Correcting Approach". Much elaborations on this type of assessment does not exist. However, generally, it should be a test which will, hopefully give the child a better mark while making note of the level of proficiency he/she has achieved based on his wrong answers from a different level. This does not sound too bad either if he/she will clear the very basic Easy level questions, however the draft says it will be tried on a "pilot" basis only and from "secondary" levels (makes sense, since it is difficult at young ages). Considering that an online adaptive test is available, the reason for a census exam looks a little unclear. "and would test core concepts and knowledge from the national and local curricula.", section 4.9.4. suggests, in grades 5?!! and 7?! This |
| PNEP_015 | No Inspection of **Individual Education Plans/Library Use/Teachers Attendance/SDMC Operations/timely reception of study materials by the child is** suggested no grievance redressal NOT DEALT | | | | The Education Department must permit Interested local (non-political) individuals/parents/non-government social workers on request allow visits to the school complexes any-time over a requested period of study and report discrepencies. Such requests must be encouraged in the IT-based girevance redressal system and be granted in a time bound manner. The onus of disproving the allegations will be left to the Department. For ex. if one reports regarding non-attendance of teachers or a school dropout, it will be the duty of the teacher/social worker/HM/ to prove that the child is in school with CCTV footages or pictures as appropriate and in a reliable and time-bound manner. |

PNEP_016	Chapter 2	P2.16.	Pg 64	Role of social workers and counsellors	THE APPOINTMENT OF SOCIAL WORKERS IS A VERY WELCOME MOVE. **P7.2.3. promises social workers every help with law enforcement or health departments. However, no tool, that is, say IT portals, in addition to databases (Grievance/Request redressal portal) given to social workers** (government or non government or even interested individuals) to request the needs of the child (say, IA, counsellor, mother language teacher, financial aid etc), as will arise when working with the children and parents. The challenges, social workers have in actually mainstreaming a kid isn't acknowledged strongly by the draft NEP. Another example, in case of a child labourer/marriage/drug abuse etc, the social worker might need additional support from the Child Protection Service/MWCD. The strategies to do all these in a time-bound and reliable manner being in place, any harwork or accomplishment of a social worker will become close to nothing with only the accountability for dropouts shifted from the HM to the social workers. Clear accountabilities have to be held by the various departments on a case to case basis. **Patterns are many times usual and hence expected requests can be predicted most times. The complexities surrounding social work when it comes to children in dire need of care and protection has not been acknowledged.** Currently, the **Child Welfare Committees and Juvenile Justice Board release rescued children without any tracking, regular counseling and follow-up of the child**, the <u>**presence of social workers is a great asset**</u> **and requires further discussion in the draft and empowerment.**
PNEP_017				Role of social workers with respect to children in need of care and protection (NOT DEALT)	The child protection services and the social workers can make home placement of children a more preferred method. However, linking of the children to these institutions needs to be channelized and all the protection systems made available to the social worker. Under the DCPU, there are financial assistances available for children not going to school. This amount is however less. Child labour issues (how universal education is possible without amending the Child Labour Act), greater financial committments towards their stipends or such is not discussed. Currently, the HM is the Child Marriage Officer (on paper) for a particular locality to which the school belongs to. Does it remain the same?
PNEP_018	Chapter 2	P2.17.	Pg 64	Mobilisation of the local community and of volunteers	We do not support this drive to pool in community support for teaching, unless sufficiently qualified and assessed. This is current practice and lacks commitment by the Education Department to pro-actively bridge the difficulties its children face, instead of relying on philanthropy/charity. Regular Basic Foundation Literacy teachers are a must since, in general, there are sufficient children in every school need some extra attention to help them cope, especially if they are first generation learners.
				Reintegrating Dropouts and Ensuring Universal	

PNEP_015	Chapter 3	P3.1.	Pg 67	Addressing access gaps in infrastructure : c. Consolidating existing stand-alone primary, upper primary, secondary, and higher secondary schools - especially those that may have too low an attendance to be sustainable on their own - into composite schools/school complex whenever possible.	(A) The policy's idea of a school complex looks like a good idea for linking schools with less enrolment. But the **size of such a complex is worrisome**. Chapter 7, Pg 159 talks about the idea of school complexes covering one secondary school and all schools within 5 to 10 miles. (that is 8kms to 16 kms) which looks huge. And there will be too many schools in the 10 mile range, we are afraid. Hence the draft requires to set proper standards and transparency in the recruitments towards school complexes and public participation in the matter. While commute by children upto 5 miles looks ok, beyond that can be certainly avoided. (B) Currently, there is poor performance when it comes to using the library which is in the same school or labs in the same school. Now, the promises of realization of sharing resources like labs across and mention of **transport even school buses** is also welcome and also worrisome considering **no strong emphasis and highest priorities assigned to safe and exclusive COMMUTE.** While it mentions to cover CWSN and Girls, the priorities aren't clear and whether it is just school to school commute is not very clear and well elaborated. Also there is **NO IT-BASED, acknowledgement based, time-bound, accountable, escalation included method to place such request/help/register related grievances accessible to any public (non sdmc parent/non goverment field workers).** **Exclusive commute to high schools can keep girls in secondary levels in rural areas.** Even if one child is present, the department must ensure proper commute. To move to a quasi-judicial body, regulatory body, close to the likes of a State Commissions for Child Rights for every such ask can be a sure failure with the general public getting discouraged and very demoralised in planning such requests, if they are not well-connected and aren't literate enough. Such a **transport request** must be allowed from a **parent-child login as well** and communicated to the parent. Activation can be ensured by including an activation procedure by the parent to ensure it has been conveyed to him. And all details/ack in child's school diary as well. Considering that the policy intends to stay for two decades, it isn't an unfair ask.
PNEP_016	Chapter 3	P3.5.	Pg 69	**Monitoring students' attendance in school:** Transparent and reliable systems for tracking attendance of all students will be set up at the local level in collaboration with teachers and SMCs.	Online Attendance systems for children which will automatically log in-time and out-times of the child and teachers. Inspection committees, comprising of interested persons/NGOs must also be allowed on request in a time bound manner for a span of time. Such inspection committees must be allowed to take attendances and track discrepencies.
PNEP_017	Chapter 3	P3.10.	Pg 70	**Second-chance education programmes for long-term out-of-school adolescents:**	**Needs tutors** to run programmes for long time dropouts especially in flexible timings because most aspirers will be working. Without presence of these programmes, sustaining the programme will become very difficult if the child hasn't attained Basic Foundational Literacy already. Move to offer in several schools is a good idea considering commute. Finding tutors in a URG is a very difficult task considering the poor literacy rates. The need for flexibility in timings worsens the problems.

| PNEP_018 | Chapter 3 | P3.12. | Pg 71 | :
 :
  To make it easier for both governments as well as nongovernmental philanthropic organisations to build schools, to encourage local variations on account of culture, geography, and demographics, and to allow alternative models of education such as gurukulas, paathshaalas, madrasas, and home schooling, the RTE Act requirements for schools will be made substantially less restrictive.
 :
 :
 Other models for schools will also be piloted, such as philanthropic-public partnerships. | This is gross violation of RTE Act which demands some minumum standards from schools. Even in the presence of RTI Act, the Commissions incharge of such violations aren't able to act in the interest of the child considering their lower powers, political interventions, corruption, lack of will, etc., There is no visible need or benefit to encourage anybody who does not meet the necessary requirements. Purely religious institutions, not teaching the sciences, logic, peace and brotherhood, must be encouraged to enrol school going kids alone and operate only after regular school hours if they aren't going to teach children anything else other than religious instructions.

 The reason for a new term **"Philanthropic-Public Partnership"** is not clear. Is it similar to "Aided" institutions? The terms and conditions, accountability structures and nature of partnership is not at all clear. And not dealt with in the draft. And we do not encourage such mysterious ventures. We are very happy already with two Aided institutions we worked with eventually turning their infrastructure and establishments for private purposes and use.

 It must be noted that, currently Philathropy or CSR helps develop schools. In either cases, the institution is required to make the spending in return for the good-will it earns. In case of CSR, it also *benefits from the branding and the tax exemptions*. **However, the current new need and mention of a partnership is not clear and need for Private-Public Partnerships is not clear.** What kind of fees are they planning to fix for students, how they will admit children etc is unclear. And what kind of public funding is planned, accountability to general public, etc needs more elaboration and clarity. ***"Sarkari Shaale Namma Shaale"*** is a famous slogan we use among children to boost their self-esteem, that it is not a free school, but their own school build from their own money (people's money). So where are we placed now with such a venture needs clarity, in black and white, in this policy.

 The reliance of the Government on Philanthropic funding which is expected for vital subjects such as education is disheartening. A stern routing of CSR funding is welcome. However, the type of intervention needs to be clear. |

PNEP_019	Chapter 3	P3.8.	Pg 3.8.	Role of social workers with respect to children in need of care and protection (Tracking OOSC) (NOT DEALT)	The child protection services and the social workers can make home placement of children a more preferred method. However, linking of the children to these institutions needs to be channelized and all the protection systems made available to the social worker (Not simply on paper). Under the DCPU, there are financial assistances available for children not going to school. This amount is however less. Child labour issues (how universal education is possible without amending the **Child Labour Act**), greater financial committments towards their stipends or such is not discussed. ~ Currently, the HM is the Child Marriage Officer (on paper) for a particular locality to which the school belongs to. Does it remain the same? ~ The Child Welfare Committee constituted under the JJ Act can work with children in need of care and protection. Tracking happens there via a rehabilitation card (Never seen one so far though fought for some rehab measures!) The CWC itself are not equipped with sufficient rehabilitation measures other than a form to make this rehab card. In such a case, what will be the state of the social worker? ~ Tracking across departments, and very clear tracking from Center to State Person's Incharge is key to the success of the social workers. ~ And then there is a SCPCR/NCPCR and such. Medical needs is touched upon but its access by social worker? ~ So how will the social worker be linked to all such varying institutions? If they are not linked in a time-bound and reliable manner, like the SMCs are offered an App to track, the social workers will get into serious depression while working with children! ~ Will the OOSC tracker track every such step from hiring a mother language teacher, requesting a bus to protecting and rehabilitating a child? No elaborate mention. Without these mechanisms/tools in place, the hiring of a social worker is meaningless. **P7.2.3 promises mechanism**s. We need more than promises considering the terrible state of affairs.

PNEP_020	Chapter 4	P4.1.1.	Pg 76	**Restructuring school curriculum and pedagogy in a new 5+3+3+4 design** Each year of the Secondary Stage will be divided into 2 semesters, for a total of 8 semesters. Each student would take 5 to 6 subjects each semester. There will be some essential common subjects for all, while simultaneously there will be a great flexibility in selecting elective courses (including in the arts, vocational subjects, and physical education) so that all students can expand their horizons as they see fit and explore their individual interests and talents. : : The notions of "higher secondary" or "junior college" will be eliminated; Grades 11 and 12 will be considered an integral part of the secondary stage.	How **Secondary and Senior Secondary Open Schooling** (like NIOS) be placed beside this concept is not clear. The semester approach, deciding on choices by children looks to early on according to us. Children will tend to choose easier subjects to score better or just clear them off even if they fail to receive quality education. And a choice of their career will lie in these pre-mature choice of their. We welcome the move to include Arts and Sports. But why not for all children alike where some children clear a higher level and others a Basic Level of Art? This will greatly boost the confidence of the children good in other fields and will help in clearing a basic level in the other subjects as well. If the purpose is to expose them to different fields, then the idea of electives will fail the purpose? Eventually, if such be not used to determine a career in Design than a NATA entrance exam, children will find mockery in such a 5+3+3+4 long education and teachers not accountable to the failures of a child in his/her entrance exams?

PNEP_021	Chapter 4	P4.6.6.1. P4.6.6.2.	Pg 74 Pg 95	*By the age of 14, i.e., Grade 9, adolescents begin to think about their life plans; schooling at this stage must therefore build on the styles of previous stages, while also incorporating preparation for university, for the world of work, and for life. Students at this stage must have flexibility of subject options for their differing talents, interests, goals, and ambitions, including access to vocational and arts courses.* *:* *:* *P4.6.6.2. Survey course on vocational skills and crafts in Grades 6, 7, or 8: Every student will take a fun year-long course, during Grades 6-8, that gives a survey and hands-on experience of a sampling of important vocational crafts such as carpentry, electric work, metal work, gardening, pottery making, etc., as decided by States and local communities and as mapped by local skilling needs.* *P4.6.6.1. Vocational exposure: The importance of and a basic knowledge of various livelihoods and life-skills (such as gardening, pottery, wood-work, electric work, and many others) will be taught at the Foundational and Elementary level, as early as the safety of children allows, so that students are well aware of, and may become interested in, these professions well before finishing high school. Some*	We do not encourage vocational training for children early on. And the very purpose of our educational institutions is questionable if they are planning so much to actually exposing and mapping the Government school children to **local skilling needs** which is what is currently happening when they drop out or do not attain quality literacy. In Pg 24, while there is a mention of age 14 as an age when a child is able to think about his life plans. The age of consent, globally is still 18. Tamil Nadu offers different vocational programmes in Higher Secondary. Even this we are not always happy with, considering the lackings in the Education leading to such choices and not real willingness. And practically, many are, even after graduation, realizing that they want a different career path and are taking up new fields. When such is the case, the special interest taken by Government schools to impart vocational education looks like double standard. **Elite schools aren't being mapped to local skilling needs. Are they?** Somehow, I don't see this year-long course fun filled, especially in grades 6-8. It is making an absolute mockery out of our ideals of equal education. Is this fragile age not a time for science projects? Metal work, electric work? Does medicine qualify for local skilling? Why is there no mention of entrance exams (NEET, NATA, etc etc) which have already been thrust upong these children? At the Higher Secondary Stages, what support has the draft discussed for these children to clear these entrance exams thrust on them? And if we are working away from rote learning? Why are the Board exams not going to be useful to get into HEIs? Already we had a clear case of failure in terms of Anita S who couldn't get through NEET to get admission to MBBS but was a victim of our unequal system. What plans are in place to help that? Should we not aspire for these kids to become Medical Practitioners and Scientists? Why such specific exposure to vocationals like electric work, metal work, carpentary and mapping of local skilling is happening so early on? What will our intent be if we take this approach? A Degree in Carpentry is what could make sense to us. In the US., they offer Aprrenticeship Degree programmes for Carpentry where thye have on-th-job training plus classroom sessions or such and **require to be minimum 18 years of age**. That seems to make more sense, if at all any. In case you feel

| PNEP_022 | Chapter 4 | 4.6.8. | Pg 95 | 4.6.8. Ethical and moral reasoning | Sacrifice, nishkam karma (it took me long to figure out what it was, please provide a bilingual translation of such words in the policy), that is to do work without expectations, to give away one's opportunities or such etc. Let us not teach all that to children. They will get exploited. If they must be taught, it must be with the necessary warnings and disclaimers. Children must be taught to shed labour for fair wages and returns. They can be taught to share and to help others and love others. Constitutional values should include affirmative action and the debates surrounding it. It should talk about miscarriage of justice, corruption etc., so that children are aware of the existing realities. Children must be encouraged to stand against corruption. Ethics should include **respect for diversity**, respect for other religions, **ills of untouchability and honour killing or ostracisation**, respect for **differing culture and food choices**, respect for differing opinions or differing political affiliations and the importance of positive dialogues for exchange of ideas and understanding, detatchment from sense of superiority professed even by revered Holy books etc., to analyse any book or content with one's own reasoning, etc., As a close friend always says, "Live and Let Live peacefully". We appreciate the mention of "*formulate a position/argument about an ethical issue from multiple perspectives*". A specific mention of inclusion and weightage of the perspective of those who are affected by the issue and emphasis on positive dialogues needs to be added as well.

Also, mercy and forgiveness should not be for someone troubling them. We need great clarity on abuse of mercy when we teach morales. On how it wouldn't be forgiveness to stay in an abusive marriage with the husband getting drunk and beating them everyday. Sometimes the ignorance of older children on such matters astonishes me. Or on *Using dustbins* is one, encouraging reporting mechanisms in case of lack of civic facilities must be taught in this case and not being merciful.

Most importantly, we must mandate these '*lessons of ethics and contitutional values*' that we teach for the Govt School kids, for Private/Aided Institutions as well, so that all are in sync about these common ideals else the entire exercise will fail to bring respect to each fellow being eventually. Also, it is seen that the elite students/children are these days even becoming peddlers to meet their drug |
| PNEP_023 | Chapter 4 | P4.6.8.5. | Pg 97 | Basic health and safety training, as a service to oneself and to those around us:
:
:
Sex education will also be included in secondary school for future judgment surrounding consent, harassment, **respect for women**, safety, family planning, and STD prevention. | Idea of "consent" is applauded. But kindly remove "respect for women". Women do not need any special respect. Instead, objectification of woman needs to be avoided. Understanding Consent (consent is an appreciated addition in the policy) in harrassment, in child marriage, in sex, in rape (under influence of drug or otherwise) and the lack of meaning in the stigma that exists for a rape victim, in stalking, in falling out of love, in respect for choices and coping when there are changes in choices in love, in divorce, in family planning, safety and STD prevention methods, STD stigma, understanding of working mothers and women empowerment, inheritance, stigma about transgenders etc., in upper primary levels is key, since children dropout widely at this point and can loose out on such important subjects they should be aware of. Even at the preschool stages, sex/sexuality education is introduced in some countries in levels that are suitable (in the form of naming the actual parts of the body as they are and classifying the private ones that cannot be touched by others or exposed by others except your care-givers and its know hows). |

PNEP_024	Chapter 4	4.6.10.	Pg 99	4.6.10. Current affairs		In dynamic content, it will make great sense to discuss their **local issues** of cleanliness -grievance mechanisms, child marriage, dropouts, remarriage etc., And to brainstorm and think about what's right and wrong, suggestions etc.,
PNEP_025			Pg 103	The exact model for how to pay, incentivise, recognise, or crowdsource authors would be set separately for each such public or private philanthropic scheme.		Kind of scheme needs clarity to understand investment in PPP
PNEP_026		4.9.	Pg 104, 105	4.9.Transforming assessment for student development : Unfortunately, the current nature of examinations - and the resulting coaching culture of today - are doing much harm, especially at the secondary school level, replacing valuable time for true learning with excessive examination coaching and preparation. : : Third, if life-determining Board Examinations are given on only two occasions, in Grade 10 and 12, then it is inevitable that these examinations will be mostly summative and not formative, which is a wasted opportunity. Examinations should also be learning experiences, from which one can learn and improve in the future; the current Board Examination system does not line up with these goals.		On one side, there is a very enthusiastic move away from rote learning. A part by part assessment (semester based approach) has been suggested. But there may be a need to move away from rote learning. This could help better precision in ranking children based on their Board Marks. The idea of vocational electives, we would like to avoid. Instead we may be ok with children choosing levels they wish to write the exams in. However, this interpretation still refuses to accept that if (A) Let's say, rote learning is done away with and the assessment procedures will change, there will be no need for different entrance exams? The Board exams will do the work for Medical institutions in the State? And the rural and URG groups wouldn't suffer the disadvantages of different styled entrance exam variants for admission to professional courses, thrust upon them in addition to the Board for which they have been mentored life-long by public funded education and support. (B) The disadvantage it will put the current lot to when it brings more competition from earlier batches needs notice as well. This competition is fueling the "coaching" industry. This is a fair disadvantage for the URGs and to make equal there should be a way of levelling the play field for those first comers and those given a second chance. Why is such a **lack of need of entrance exams for medical admissions not acknowledged** by the Committee in the draft despite their ideas of shifting to a new mode of assessment? How is it "life-determining" if it is not going to be considered in all admissions in the State. Currently the same Science teachers have been given the added responsibility of NEET coaching for NEET in TN Government schools. Previous NEET coaching bills still lying pending with the Center for reasons unknown says HC proceedings. What are the plans proposed by the Policy in Tamil Nadu and in other States where children will face the same backwardness imposed by a competitive entrance exam which will block their admission into medical institutions, a vital field where the URGs need to make good progress in? How else is the State/Center planning to curb the growth of such "high paid coaching centers"? Others entrance exams like NATA even has perspective diagrams, not dealt in our

PNEP_027	Chapter 4	P4.9.5.	Pg 108	**Restructuring of Board Examinations:** Additional Board Exam.. Students will be expected to take a total of at least 24 subject Board Examinations, or on average three a semester, and these examinations would be in lieu of inschool final examinations so as not to be any additional burden on students or teachers. : : Recall that students will be taking 40+ semester courses during secondary school, so 15 or more semester courses could be decided completely locally by the student and assessed locally by the school, including subjects that would traditionally have been considered co-curricular or extra-curricular.	Too many variations could burden children and teachers and too much specialization must be avoided at such you levels. While Section 4.4 (Pg 78) acknowledges that Specialisation should be delayed, so that students' choices are not dictated simply by parents or society, but rather via their own experiences, interests, and self-reflections. So many choices and numbers are offered so indiscrimnately and this is very confusing and bothering and seems unnecessary. Children's demand has been a reduction in content time and again. We seem to have lost sight of it and are confused at our own stands taken in the draft at different times. 15 courses decided locally?
PNEP_028	Chapter 4	P4.9.5.	Pg 108	**Restructuring of Board Examinations:** In addition, each student would be required to take **three basic language Board Examinations that assess basic proficiency** in the three-language formula, **and at least one additional Board Examination in a language of India at the literature level.**	Let's teach children the absolute necessities - **Mother Language, English, State Language (Basic/Intermediate/Proficient Level)**. Any new languages must be learnt by the children based on their interest and need. However, considering the passion of the Committee towards sanskrit, they could consider sharing the learnings from the language's literature. In addition to Maths Clubs, olympiads etc., they could plan a **Language Literature Melas** where the different language literature can be shared and cherished by children and teachers and community members to celebrate diversity. Such an event should be unbiased and must include as much diversity as possible. No need to bring it into the curriculum. **Reducing the curriculum to the absolute essentials is mandatory for the child.** The love for a language in a State is a very vital element for the protection and progress of the language. These sentiments have to be respected and are very valid grounds to hold on to. **India is not a one nation. It is a a union of federal states and to respect its diversity is key to maintaining the Indian identity of "Unity In Diversity"**, not, one knowing one common language or not one knowing several languages, but the celebration of each other's differences and diversity with love, peace and brotherhood and mutual respect.

PNEP_029	Chapter 5		Pg 114	What makes for outstanding teachers and teaching? : Teachers, and their schools, school complexes, and classrooms, must be well supplied with the learning resources that they need for effective teaching.	How will this be ensured and how will such data be opened up for the General Public? Will this be available in the proactive disclosure planned? And reporting mechanisms available? Any plans to bring parent participation here?
PNEP_030	Chapter 5	P5.1.2.	Pg 121, 122	Teacher recruitment process: : Because written examinations cannot necessarily test passion and motivation for teaching - key qualities needed for outstanding teachers - and cannot always determine familiarity with local language proficiency when relevant, a second screening for aspiring teachers will be instituted, that would involve an interview and a short 5-7 minute teaching demonstration.	Recording must be possible from an IT-based system available to all. SSRA suggests such availability of data in public domain. If this is included is not clear.
PNEP_031	Chapter 5	P5.1.3.	Pg 122	Achieving desired Pupil Teacher Ratios:	Reporting must be possible from an IT-based system available to all. Appointment of teachers to school complexes must reveal time tables and ratios across schools.
PNEP_032	Chapter 5	P5.1.8.	Pg 123	Stopping the practice of para-teachers	We welcome this move and appreciate the direction of moving towards long-term, committed teachers.
PNEP_033	Chapter 5	P5.2.3.	Pg 126	**Ensuring that teachers are able to teach with full dedication and at full capacity - no non-teaching activities:** Teachers in turn will be held accountable for being absent from school without cause or without being on approved leave.	Who will report is not clear. Wanted to mention a case when HMs have been absent at school premises on the pretext of HM meetings. It is interesting that, my next work at the BEO office revelaed (by BEO himself) that no HM meeting was called for! many of our associates have spotted teachers turning up for work very late in the communities we work with. So how are we going to ensure this? Finger print readers? CCTVs? Public Grienvance System? Inspection Committees comprising interested individuals, NGOs etc in assition to SDMC representatives? How is a very key question. Can a Quasi Judicial Regulatory Body ensure it? No. "All people's participation" in registering grievances alone is some hope. And such reporting must be easy and at the click of a button for it to happen easily. Sorry, for the excessive scrutiny. That has been the case with few who affect children greatly.

PNEP_034	Chapter 5	P5.2.6	Pg 127	**Community connect:** In the spirit of increasing local governance, and involving the most crucial stakeholders (including teachers) in the governance process, every teacher by rotation will have the opportunity to serve and connect with their community by being on the **SMC and SCMC.**	Awareness could be also imparted via school diaries with scan codes on them linking it to audio-video content elaborating on SMCs. Any IT-based grievance system must however allow anyone to report and not the SMCs alone. Elections to SMC must happen in an open and fair manner and parents meeting conducted by SMC regularly to receive parent grienvances. Appraisals of teachers by SMCs must happen only post parents meeting by SMCs with other parents. Provisions must be given to complain about various issues including that on teachers, like say attendance, corporal punishment etc
PNEP_035	Chapter 5	P5.2.7.	Pg 127	**Materials for teachers in Indian languages:**	Posting in digital form will ensure its timely translation and deployment. Materials for children need to be given with proper acknowledgement from parents to ensure that things happen in a time-bound manner and there are posibilities/acknowledgements of validating the claims of disbursal.
PNEP_036	Chapter 5		Pg 128	**The practice of assigning teachers to individual schools based on overall student-teacher ratios will be replaced by a much more careful assignment system based on the educational needs of children.**	How exactly? Does this mean that it will end up with the possibility of assigning lesser teachers than as much prescribed by the RTE Act?
PNEP_037	Chapter 5	P5.4.1.	Pg 130	**Tenure track system of hiring teachers** A tenure track system for hiring teachers across all levels of education will be established. Under the tenure track systems, teachers will be on a three-year probationary/tenure track period followed by a performance-based confirmation. Confirmation/tenure decisions will be made based on multiple factors including peer review, dedication, and classroom evaluation. The framework for this review will be set up by the SCERTs. It must include evaluation and assessment of long-term work and must not be based on episodic assessment. This assessment should be multi-source; reviews of peers, supervisors, and parents, and actual evidence of work, must be included. The system must be professionally rigorous and fair.	Will this be available on the websites as well? How will parents' reviews be obtained? What steps have been taken to eliminate corruption in the confirmation process of teachers? What online processes/acknowledgement systems are in place to track the same? How is the "3 year window" fixed? Will they be paid lesser? Is the 3 year long tenure fixed to save Government money on teacher recruitments? Such long tenure seems harmful to both teacher and child.

PNEP_038	Chapter 5	P5.5.4.	Pg 136	**Closing down substandard standalone teacher education institutions:** : A sound legal strategy to weed out poorly performing programmes and shutting them down will be put in place by the Rashtriya Shiksha Aayog (RSA) (see Chapter 23), in collaboration with the National Higher Education Regulatory Authority (NHERA). Promoters of such institutions will be free to put their infrastructure to other productive uses, such as for vocational education. See also Section 16.1.	What will that strategy be? And how will the institutions (TEIs) evaluated? India is a Union of States and Federalism (having or relating to a system of government in which several states form a unity but remain independent in internal affairs) is key to this Union. Currently, Internal Affairs of Education should be matter of the State unless absolutely required. Education is on the concurrent list and hence the internal affairs of regulations in School Education cannot follow a Micro Management (Center to State) approach to everything, with decisions being made at RSA with the a select committee comprising experts and CMs on a rotational basis is a mockery of the powers granted to the State and a complication for even its people. It stands against the promises of federalism on which the nation was built, which is not a good idea.	
PNEP_039	Chapter 5	P5.5.1.	Pg 134	Every B.Ed. programme will be affiliated with 10-15 local schools where studentteacher internships would take place. Each student in a B.Ed. programme will go through a period of student teaching at one of these schools where she/he would be placed with a mentoring teacher - first observing the mentor's class, then teaching students in the mentor's classroom with feedback from the mentor, and also carrying out remedial work or other teaching-related tasks under the mentor's guidance	Success in giving a Basic Foundational Literacy to a under-performing or drop-out child should translate into a boost in the appraisals/credits earned by the Intern or Instructional Aide, Mentoring Teacher, upwards to all associated in the chain till BEOs/DEOs. Reporting lapses needs of a child before starting work is important and the progress will be tracked in a physically transparent and IT-based manner, periodic progress reports etc., to ensure that the success stories are not generated just before the appraisal dates. Such credits should get automatically processed based on evidence based reporting in the form of videos of reading (before/after) and writing samples etc., The Out of School Child Tracking system could reflect these sufficiently to help track this progress by any social worker (Government/Non Government), volunteer or complainant.	
PNEP_040	Chapter 5	P5.4.3.	Pg 130	**Professional progression via promotions and salary increases:** There will be at least five promotional levels as a teacher in each stage, which may be labelled Early Teacher (without tenure), Early Teacher (with tenure), Proficient Teacher, Expert Teacher, and Master Teacher. Within each promotional level / rank, there would be a preset range of salary levels through which teachers could progress based on merit and performance in that rank	Who is a Early Teacher (without Tenure)? Low salaries encourage recruitment of teachers with insufficient levels of teaching for children.	

PNEP_041	Chapter 5	P5.5.6.	Pg 136	**Specialist teachers:**	Tamil nadu seems to have made better progress than Karnataka when it comes to Special Children. However, still, it takes about 1 month for a special educator to meet the same child on their visits on a rotational basis. With school complexes, a similar situation might come up with the child denied sufficient attention and time. Even the regular teachers opine that it will be nice to have dedicated staff for such children. Considering the current state of affairs, the recruitment of special educators on a one-to-one basis seems far from reality though desired. We recommend a stage by stage development in this sphere which the Education department upgrading schools to "**inclusive schools**". **Section P6.8.3. Physical access to schools for children with special needs** talks about it and is a highly welcome and asked move. Hope it is prioritized sufficiently and "suitable" transport will mean what it must.	
PNEP_042	Chapter 6		Pg 138	Historical discrimination against various groups in our society has had a strong corresponding harmful impact on the practice of education as well, e.g. differential classroom seating based on caste, or only girls doing **domestic chores in school.**	What domestic chores in school are we talking about? Do we have provisions to recruite Helpers who will clean campuses? Or are we planning a take on Japanese culture of cleaning up themselves and together, in both our private, public, and aided institutions?	
PNEP_043	Chapter 6		Pg 139	It will also be essential to take into account research that ascertains which measures are particularly effective for certain URGs. **For example, providing bicycles and organising cycling and walking groups to provide access to school have been shown to be particularly powerful methods in increasing participation of female students - even at lesser distances - because of the safety benefits and comfort to parents that they also provide.**	There are safety concerns leading to dropouts in few villages of Villupuram recently. Distances were about 6-7 kms to High School, an exclusive commute can change many things. Section P3.2. talks about the same. And needs stronger committment in the draft. Bycycles and walking groups may not always avoid stalkers unless there is a promising elder in such groups.	
PNEP_044	Chapter 6		Pg 142	**Establishing mechanisms to address discrimination, harassment and intimidation:** Admissions processes that go against the spirit of inclusivity will be abolished, and institutional processes (including time-tables and academic calendars) will reflect the diverse needs of learners and their communities	How will time tables be ensured? Reporting will be enabled for parents/caregivers and the how's and why's could be shared to the children in their school diaries with scan codes linking to audio and video talking about such.	

PNEP_045	Chapter 6	P6.8.3.	Pg 155	**6.8.3. Physical access to schools for children with special needs (NOT DEALT)**	6.8.3. talks about "suitable" transportation. Current public transport systems are not supportive for physically challenged children. Hence enough investments need to be made on safe exclusive systems. Also the bus windows aren't CWSN friendly. Even children with mental disabilities need escorts, sometimes a hired Help will do, but sometimes an acquainted escort (Attender) becomes mandatory. Children with moderate disabilities but quite good potential to live a social life and learn a vocation are mostly often disturbed hugely by usual public transport and the longer the routes the more disturbing for the child. A strong committment to such children is mandatory. Seizures could be common in such children and does not mean they need to be denied admission. It might be necessary to arm these "inclusive" schools with the necessary trained support staff. In the US the ratio of such special children to those of the special educators is very high. And the compensation packages high compared to the latest 2017 notification of CWSN spending. Once we have sufficient staffing in these schools, home visits to children with severe disability could become close to reality than being close to papers as it is now.
PNEP_046	Chapter 6	6.8.		**6.8. Education of children with special needs IQ of special children (NOT DEALT)**	IQ of special children admitted to the current "integrated" schools is 60. A little less, that is, moderate disabilities are mostly denied. Such children are recommened special schools by doctors in such case (not because that's alone possible) and are capable of socializing and learning vocations. We observe such children are admitted to daycares in Tamil Nadu's CWSN Daycares and have even taken NIOS exams independently, they say. The commitment to serve as wide a spectrum as possible with respect to CWSN in "inclusive" schools needs to be promised by the Policy. We have faced several rejections by private-philanthropic integrated schools depriving the child of something, we strongly believe that the child deserved. Socializing with normal children is very beneficial to children either ways.
PNEP_047	Chapter 6	P6.8.2.	Pg 154	**P6.8.2. Financial support for initiatives for educating children with special needs: (NOT DEALT)**	SSA (until 14 age) provides Rs. **3000/- per child per annum** for the interventions related to education of CWSN. **The major interventions under SSA are provision of free aids and appliances, transport, escort support, appointment of resource teachers, therapeutical support and barrier free access etc.** Under IEDSS (secondary stage child) in addition to the above listed interventions, Rs.3000/- per child per annum is provided as Central Assistance to be topped by the States by a **scholarship of Rs.600/- per disabled child per annum**. This includes monthly stipend of Rs. 200/- to the Girl students with disability. [31-July-2017 15:45 IST][MHRD Press Release] A conceivable policy should consider ground realities and act appropriately with real committment.
PNEP_048	Chapter 6	P6.8.7.	Pg 155	**Special educators and therapists with cross-disability training**	We prefer specialized therapists in "inclusive" schools across schools or school complexes

PNEP_049	Chapter 6	P6.1.3. (b)	Pg 142	Alternate pathways for recruitment of teachers from URG	Here to recruit URG deserving candidate into Teaching Profession, the Department plans to educate them and unlike usual "training followed by recruitment", they syggest a "recruitment followed by training" which is very concerning. A child who is suffering already must not get caught because of untrained tutors. The document also elaborates on giving them scholarships to finish their BEd which is a great move. However, possibility of recruiting the URGs and empowering them must not mean that they are untrained, under-paid and misused in a corrupt manner. Hence they must be given an equivalent payscale to that of a qualified one. We however prefer their engagement only after training. Until then they could take up supportive roles without affecting the performance of the child and under mentor tutors who will be accountable anyway.
PNEP_050	Chapter 8	P8.1.8.	Pg 184	**Boards of Assessment:** : There may be private not-forprofit BOAs, which may be entirely independent, only with oversight by the Department of Education or MHRD to ensure that they continue to abide by the approval conditions.	The policy suggests the formulation of a separate body for setting curriculum and separate Board of Associations (BOA) to plan the Board Exams. It paves the way for new BOAs as private not-for-profits. Which beneficiaries is this targeting? And the reason for allowing such multiplicity and liberalisation is not clear.
PNEP_051	Chapter 8	P8.3.6.	Pg 191	Fees in private schools	can be increased when the increased "Fees is justified". What is that "justified" needs more elaboration.
PNEP_052	Chapter 8	P8.3.8.	Pg 191	Diversity in private schools: : the regulatory authority and the licensing authority must encourage all private schools to build diversity and inclusion within their student populations, through recruitment, lotteries, and scholarships. The impetus for this must come also from educationists, NGOs, and public intellectuals. In the end, the schools must decide that they want this; **forcing schools through measures such as those in the RTE Act 12(1)(c) have not worked nearly as effectively as had been hoped. Giving schools the autonomy to do the right thing, and to innovate, is in general the better way to encourage best practices in schools**, and is in better alignment with the principles of this policy.	Does it suggest the stopping of RTE admissions in private institutions and plans to give the choice of taking (diverse) URG students to the institutions without force?

| PNEP_053 | Chapter 8 | P8.3.9. | Pg 191 | 8. Regulation and Accreditation of School Education Improvement of educational outcomes of private schools:
a. The public system institutions will not make extra and specific efforts for the private schools, but will enable the private schools to leverage ongoing activities of the public system, e.g. a private school may send its teachers to participate in capacity development workshops being designed and run for public school teachers; or it may participate in resource-sharing activities of
school complexes (e.g. use or building of common playgrounds, or sharing of vocational teachers, etc.). | The playgrounds and the access of it by the Government schools within a school complex is concerning. On top they are allowing use of grounds by private institutions? The size of the School complexes is a problem. So, are we expecting more new schools to compromise on the RTE Act obligations and request for such school complex resource sharing? This isn't correct and will eventually lead to compromise of the Government School Kids. |

PNEP_054	Chapter 8	P8.4.2.	Pg 193	**Review of the RTE Act:** The RTE Act will be reviewed comprehensively in light of this policy, to enable the policy, and at the same time to improve it on the basis of the experiences and learnings of the past decade: a. The **overemphasis on inputs, and the mechanistic nature of their specifications – physical and infrastructural – will be changed and the requirements be made more responsive to realities on the ground,** e.g. regarding land areas and room sizes, practicalities of playgrounds in urban areas, etc. These mandates will be adjusted and loosened, leaving suitable flexibility for each school to make its own decisions based on local needs and constraints, but without in any way compromising on the requirements of safety, security, and a pleasant and productive learning space. b. Educational outcomes will be given due importance and will be added adequately in the assessment of schools. c. Clause 12(1)(c) will be reviewed in light of this policy and in light of any positive as well as negative experiences it has encountered over the past decade. • In a basic sense, 12(1)(c) is extremely well intentioned, aiming to bolster the inclusion of students from socio-economically disadvantaged backgrounds in	(a) Loosening the physical and infrastructural requirements is not recommended. Mushrooming of such small schools will also lead to downfall of the Government school for not so great reasons. Many institutions are misusing and earning profits without providing necessary facilities. (b) seems to be considering giving autonomy to institutions would allow institutions to choose between taking up the 25% mandate or set it aside? (d) is allowing institutions like Gurukulas, Alternate school etc to take part in the Education system. What kind of exemptions is not clear? With the ethical and Basic Foundational Literacy be mandated and such essentials mandated? In other parts, such sciences being taught is "not mandated" but instead encouraged. In such circumstances, it is not a good idea to recognize such.

| PNEP_055 | Chapter 8 | | | | Role of SMC in Regulatory Mechanisms (Not dealt properly) | Role of SMC in Regulatory Mechanisms is reduced to signatures alone.

The SMC, when formed aspired to have a very significant role of monitoring and determining the needs and development of the school. Making information public is a good move. But to endorse financials hardly makes any sense.
The Accredidation/performance of Evaluation surveys (RTE requirements/other set requirements etc.,) itself should be based on SMC inputs and parents inputs more than any. And the status of the institution decided based on such survey responses by parents. The school's different facets can be analysed and reviewed by the parents body/SMCs and given after disclosure and consensus in all parents meetings. Other parents must have a mechanism to object to SMCs endorsements if the need be.
It is a matter of an online questionnaire if such is easy to use for a parent with foolproof acknowledgements. |