



Draft National Education Policy (NEP) 2016: A review

School Education

Preamble

India has made phenomenal progress since independence in the field of education. Following the Millennium Development framework India had crossed the cut-off target of 95 percent of the Net Enrolment Ratio (NER). Currently, there are close to 1.5 million K-12 schools in the country with a student base of 253 million.¹

The Indian education system has made significant progress in recent years. Recognizing the importance of education in national development, the Twelfth Plan (2012–2017) places an unprecedented focus on the expansion of education, on significantly improving the quality of education imparted and on ensuring that educational opportunities are available to all segments of the society. Public spending on education increased rapidly during the Eleventh Plan period. Education expenditure as a percentage of Gross Domestic Product (GDP) rose from 3.3 per cent in 2004–05 to over 4 per cent in 2011–12.²

Governments, both at central and state levels, through programs such as Sarva Shiksha Abhiyan, Mid-Day Meal etc. have done quite well towards providing access and increasing school enrolments at Primary level. While the state has done fairly well in providing ‘access’, there exists a time gap in providing ‘quality’. At secondary level, the dropout rate continues to be quite significant. In majority of schools, standards of education delivery, learning outcomes, governance standards, infrastructure, digital technology intervention etc. continue to remain a concern. The proposed policies of **National Education Policy 2016** can further recognize that school education plays a crucial role in economic and social development of a society.

The Indian society has always given utmost priority to children’s education. They aspire to choose an institution with an integrative, holistic and inclusive education. The emergence of a well exposed and hugely aspirational middle class and rise in affordability levels all across have further augmented the demand for high quality and holistic 21st century school

¹ Private Sector’s contribution to k-12 education in India- FICCI & E&Y research- [http://www.ey.com/Publication/vwLUAssets/role-of-private-sector-on-K-12-education-in-India/\\$FILE/EY-role-of-private-sector-on-K-12-education-in-India.pdf](http://www.ey.com/Publication/vwLUAssets/role-of-private-sector-on-K-12-education-in-India/$FILE/EY-role-of-private-sector-on-K-12-education-in-India.pdf)

² Eleventh Five Year Plan, GoI- http://planningcommission.nic.in/reports/genrep/annual_report12_13.pdf

education. This has led to exponential growth of 'Private Schools', majority of which enjoy high recognition in the society. They are increasingly becoming the preferred choice for the community and have been playing a significant role in nation building.

Gist of recommendations is that NEP 2016 shall highlight government's roles as 'Policy Maker', 'Regulator' and 'Operator'.

- **Policy** shall act as an enabler to attract more and more states and independent players to make long-term investments for upgrading existing and setting up new high quality 21st century ready schools.
- **Regulatory** framework shall move from archaic and prohibitive regulations to a Self-Regulated model that works on transparency and disclosures.
- **Operator** shall be based on the principle of *perform or perish* for both state and independent schools

Considering all the aspects, **National Education Policy 2016** shall meet following key objectives:

- ❖ Education which helps in actualizing the potential of every individual, to live in coherence with nature, to live in a way that makes life worth living, to have the ability to make high quality and responsible decisions as a human being.
- ❖ A cohesive learning environment which will develop an attitude of compassion, resourcefulness, mindfulness and self-belief.
- ❖ A system that promotes curiosity and critical thinking, creativity, research and innovation and push learners and the teachers to "*raise the bar*".
- ❖ A holistic approach to integrate technology to encourage globally accepted and recognized innovations
- ❖ An efficient model of governance which is more engaging, transparent and accountable.
- ❖ Removing bottlenecks and creating opportunities and incentives for attracting more investments in school education by various entities including large organized corporate having long term vision and goals

Based on the draft NEP 2016 circulated and inputs received from FICCI School Education Committee (FSEC), comprising of school managements, domain experts, industry consultants and national and regional level associations and foundations, FICCI recommends the following key points to be considered and incorporated in Final National Education Policy 2016 document. The document covers following key aspects of Learning Framework for a School, Teacher, Learner and Community:

Reimagining a School for Tomorrow

Importance of Independent Schools

Can we convince a 21st century student that our schools are really educating them for future with a system that is anchored in 20th-century policies and based on 19th-century principles of student learning? Are we preparing children of today to deal with a tomorrow about which we have a very hazy and scanty idea?

To answer the above questions, it is imperative to accept the importance of private schools, which have made significant progress in recent years, primarily because of people's willingness to ensure quality education for their child. The K-12 system in India can be segmented by ownership, level of education and board of affiliation. 25% of all K-12 schools in India are private schools, accounting for 40% share in student enrolment.³ Private schools are expected to grow at 4% requiring- 130,000 additional schools by 2022.

In order to enable and encourage private sector participation in K-12 schools, the FICCI Committee on School Education has outlined suggestions and recommendations on moving from an input based system to an outcome based system, allowing schools to be established on short term rental/ lease model, enable pooling of resources from both state and private schools for effective utilization, enable flexibility in land ownership, allow the market to

³ Role of Private Sector in K-12, <http://www.ey.com/in/en/industries/india-sectors/education/ey-role-of-private-sector-on-k-12-education-in-india>

determine teacher salaries and consider a unified single window clearance to ease entry barriers for school owners/ operators.

India is unique in terms of percentage of students that go to private schools. As against the global average of sub 10%, about 42% students go to private schools in India. Over the years different genres of schools have emerged to cater to diverse needs and aspirations of the society. Schools differ in terms of curriculum offered, infrastructure facilities, student: teacher ratio, length of school day, boarding options, variety and choice of co-curricular and extra-curricular activities etc. Several International Schools have also come up to fulfill the needs of returning Indian families, expat community living in India and also the globally mobile Indian households. This availability of choice has further attracted more and more households towards independent schools.

Independent schools have all along remained strong pillars of nation building by embracing responsive academic culture, school-community connect and instructional design for iGeneration through modern pedagogy and ICT systems. They are thereby delivering high impact quality school education which in turn enabling all learners to recognize and create their individual growth paths, develop their strength, collaborate for self-development as well as for societal good.

Recognizing the role of private schools, it is desirable that NEP carries a specific chapter on the Independent School sector covering following points:

- Highlighting the spread and significance of independent schools in nation building
- Identifying the many bottlenecks such schools face
- Presenting proposals to revive and rejuvenate the sector
- Recommending innovative ways to foster collaboration and sharing between independent schools and state schools in order to raise overall quality

The education system of a nation plays most vital role in “nation building”, not just for current generation but generations to come. Projections show that our country would require a gross incremental workforce of 250 million by 2030, and to cater to this demand, the private and public institutions, private stakeholders and government agencies must

come together around a common vision of the way forward. With the positive contribution by all the stakeholders, **WE** can together make a definite difference and impact. School

‘Learn in India’

Measures need to be taken to make the vision of ‘*Learn in India*’ a reality. World class infrastructure, quality of teachers and appropriate learning tools are some of the key areas which will make our schools more attractive and aspirational. To realize this vision, we shall have to classify schools into three different genres and create an enabling environment for them to excel and prosper:

- Basic Schools delivering good quality education
- 21st Century Ready Smart Schools that foster high order thinking
- International Schools largely catering to Internationally mobile households

Incentivize Independent Schools to align with state schools

Several models have been tried in the past in the area of PPP; only few of them have successfully been working. PPP has been proposed as an important strategy in the Eleventh Five Year Plan. Among many things, the Eleventh Plan has proposed the setting up of 6,000 new model schools in secondary education, affiliated to the Central Board of Secondary Education. Of these, 2,500 are to be under the PPP model. We propose to have a viable PPP framework to address the gaps and need of upgrading and improving several of our state schools. An incentivization framework shall be developed to motivate and encourage quality institutions to come forward and form such partnerships.

Overall following points are highlighted for consideration in NEP:

Reduce Entry Barriers

Healthy competition is the foundation to get the best of our resources. We must aim to create a vibrant and healthy competition among independent schools as also between independent schools and state schools. This would lead to excellence in the quality of education and learning outcomes. Reduced entry barriers, clarity in regulations and enabling environment shall attract more and more investment and long term players to

enter this sector. Increased number of players would increase competition that shall also keep fee levels in check and affordable. NEP 2016 shall grant full autonomy to schools based on a self-regulatory framework and external agency accreditation mechanism.

Centers of Excellence: Recognize existence of Different Genre of Schools

21st Century Ready Smart Schools

In the 21st century, the industrial economy is driven by information, knowledge and innovation. Through a combination of explorations, activities and real-world, technology-rich projects will help prepare school students to be college- and career-ready. NEP shall provide the basis for developing a credible rating framework. Schools rating high on the framework shall be granted certain relaxation in regulations. Such schools shall be encouraged to share their best practices with other private and state schools.

International Schools

With the increase in income and willingness to pay, the profile of the "international" student has changed. Earlier only children from expatriate families, business class and multinational professionals were going to international schools but now even middle class families are sending their children to these schools.

Also, Government of India's initiatives such as Make in India, Digital India, and Startup India is aimed at getting more FDI's to India. More schools offering International Curriculum are needed to cater to expats, transient households and internationally mobile Indian households. Such schools are keys to realise government's broader visions.

NEP shall recognize impact of such schools and set them as a benchmark in rapidly changing world of knowledge.

Key Challenges and Recommendations

The problems in India's education sector are not unlike most other sectors, with the major drawback being that of implementation. In the complex system of Indian Education, there are many stakeholders who influence the ideation and implementation of 'education'. Right at the top there is the government and the policy makers, who formulate plans and methodologies to create the future bright minds of the nation, to give children opportunities for all round development and to educate children the 'right way', and right at the bottom are the actual children, the receivers of the education system. Ironically, in most of the cases, children, for whom this collective mission is being designed, are forgotten and become the least priority in the education system. The NEP 2016 could possibly be a path breaker in terms of keeping "child" at the centre of every policy.

Following are the key challenges and recommendations to be considered for NEP 2016:

Leadership

Key Challenges

- Leadership selection – At present the Principal selection process is biased and teachers who have served a number of years in service are promoted to being Principal. Often a teacher with maximum number of years in service is made HOD or a HOD is made a Principal, in the process a School loses a good teacher or leader
- Leadership Training - They are not of the desired standard and fail to create strong leaders, there is no evaluation of the training process as well
- Leadership Motivation - There are no incentives and structures in place to continuously motivate school leaders

Recommendations

- Leadership selection: NEP shall have well defined selection criteria which include the skills and abilities required for leadership role.

- Leadership training: There must be continuous training programmes which bring together not only school leaders from the surrounding communities but also regularly invite school leaders who are practicing innovative strategies to maintain quality in their schools
- Leadership motivation: School leaders shall be given opportunities to articulate their vision and goals and self-asses their performance. This will help maintain accountability and motivation amongst leaders.
- Monitoring for accountability: With empowerment comes responsibility. There shall be continuous evaluation school leadership to ensure learning standards are maintained and desired goals are achieved.

Faculty

Key Challenges

- Many of state schools do not have minimum number of teachers prescribed by the RTE Act
- Recruitment process for private as well as state schools' teacher and few opportunities for promotions and growth are daunting prospect entrants
- Due to lack of continuous professional development, teachers are not very well versed in the new developments in pedagogy, education technology, assessment philosophy and other key aspects of teaching and learning
- Non availability of world class teacher training academy

Recommendations

- Selection process needs to be relooked. Government shall consider removing minimum caps of requirements so that right people can be hired.
- Media and communication technology have ensured that students have easy access to information. The role of a teacher has therefore changed from an instructor to facilitator. The new policy shall ensure on the job "compulsory ICT" training.

- There shall also be annual calendar for professional development activities to ensure that teachers are well versed with new developments in pedagogy, education technology, assessment philosophy and other key aspects of teaching and learning
- Building world class teacher training academy with public-private partnership.

Information & Communication Technology (ICT)

Key Challenges

- Schools are not equipped with adequate ICT infrastructure
- Digital divide (between students of private and government schools) and the student-teacher divide (where students who have easy access to ICT are ahead in using it as compared to their teachers)
- Application of evolving pedagogies, and constantly changing technologies
- Understanding that learning is bigger than the technology – keeping the focus on the learning objectives rather than the gadget or the software
- Managing the selection of technology – to optimise for cost as well as desired learning outcomes
- Developing the capacity of in-service and pre-service teachers to use ICT effectively for learning

Recommendations

- Students and teachers of schools with no adequate ICT infrastructure shall at least be familiarised with basic tools and software which they may use in later part of life. For the same certain “*hub schools*” can be created. Government to aid such schools.
- Different education resources (e-content, audio-visually, software applications) and web based activities shall be prescribed and integrated across subject areas
- There shall be a calendar of professional development in ICT. The teachers need to be empowered to use online forums to collaborate with peers and share good teaching practices, engage students to develop higher order thinking skills, use resources to think beyond the classroom and use the technology (hardware and software) available to its optimum.

Multiple Examination Bodies

Key Challenges

- No parity across various examination bodies. There is an evident disparity in learning levels of students securing similar marks across two boards
- Assessments are more focussed on *memory recall* rather than assessing a child's analytical and critical thinking skills, rigour, awareness, thoroughness in research test and various other skill sets
- Huge inflation in assigning marks and disparity in marking schemes. Higher education institutions grant admission with certain baseline assurances about the incoming class, but these scores do not provide direct evidence of many other attributes associated with a student.

Recommendations

- De-stream: Across all Boards, give options to students to make subject combinations based on diverse interest and acumen. It will allow students to pursue multiple disciplines and make a final choice at tertiary level.
- Parity for University Admissions:
 - Option 1:
 - Create an 'Examination Monitoring and Moderating body'
 - 10 marked transcripts each of high achievers, mid-level achievers and low achievers of all the boards should be assessed by this monitoring body to determine equivalence
 - Based on equivalence, final marks should be moderated for University admission
 - Option 2:
 - Create a universal aptitude test for University Entrance in select subjects in lines of SAT

These steps will create level playing field for University entrance for all students coming from different boards.

RTE Act

Key Challenges

- RTE in current form has failed to achieve its objective of increasing overall enrolments
- Shift of students from state to independent schools – leaving state system unoccupied while burdening independent schools
- It has raised unethical practices to acquire EWS certificates
- Inadequate compensation coupled with fee hike restrictions has put added pressure on independent schools

Recommendations

- Revise no detention policy: Detentions up to class 5 to be restricted only in such cases where attendance is below 65%. It will lay down a strong foundation for students in the longer run.
- Admissions under RTE Act 12(1)C applicable only when there is no vacancy in neighborhood state school should be referred to private un-aided schools
- Compensation under RTE Act should be commensurate to school's infrastructure and delivery model. It could be pegged to 90% of the actual fee charged from regular students.
- Different genre of schools have different cost structures- diversity in salary scales, student: teacher ratio, infrastructure maintenance and running costs etc. Difference in cost structure already well recognised by society as parents pay different fee for different schools. In this case denying a revenue loss of 25% to an independent quality school impacts its delivery- both academics and non-academics.
- Provide alternative to 12(1)C: Incentivize Independent schools to come forward for 'STEP' by granting them exemption from 12(1) in lieu of Independent schools can engage their students and parents to do fund raising for STEP. Through this a much larger community of students shall benefit compared to 25. It will also be a win-win situation for public as well as private schools.

- Curb mal-practice in issuance of EWS Certificates: There is a big racket in issuance of EWS certificates. Government shall consider a single window issuing system with continuous monitoring.

Lack of comprehensive School Assessment Framework

Key Challenges

- No comprehensive framework for school evaluation
- No objective parameter for schools to compete with each other
- Due to non-availability of evaluation and assessment process parents are left to make choices on perception and not facts

Recommendations

- Establish a School Rating System: FICCI has been committed towards attaining the various goals to meet the objective of bridging the gap between public and private schooling in India. In the same process it has been working with external agencies to set up a credible *School Accreditation and Rating Mechanism*. It will be an inclusive rating system for State and Independent schools.
- Rating shall be based on *Self Evaluation* and *External Evaluation* standards such as Management Vision, Governance Model, Transparency, Parental Satisfaction, Student Safety and Hygiene, Professional Development, Learning outcomes and other key aspects of a School's systems and processes.

State spend on school education not bearing desired results

Key Challenges

- State school funding not closely linked with performance
- Inflated enrolments
- Lack of accountability of heads and teachers of schools

Recommendations

- School Voucher Program: School Vouchers are state-funded instruments that pay for students to attend schools of their choice. They allow parents and students to

choose the right school, be it independent or public. Eligibility criteria like income threshold, students attending low performing schools, students with disabilities for students, etc. can be set to avail the voucher facility. Government funded schools shall also be brought under this scheme under close monitoring.

- Government shall consider scheme in line with “*Direct Benefit Transfer*” for performing state and Independent schools

Entry barriers for new independent schools

Key Challenges

- The process to start a school and receive Certificate of Recognition is unduly cumbersome
- Lack of single window clearance facilities
- Present framework on *surplus clause* is ambiguous and leads to litigation
- Current guidelines are ambiguous on ‘*return on capital employed*’ to the sponsoring body
- In most of the states, schools can only be set up by either Societies or Trusts

Recommendations

- Single window clearance like for ‘SEZ’s and ‘EPZs’ and also aligned with Government’s “Ease of doing business”.
- NPE shall have provisions to allow schools/sponsoring bodies to generate surplus of up to 20% every year that could be used for: Investing in latest technologies, upgrade current systems and infrastructure, introduce new disciplines and faculties, improve student : teacher ratios, invest in new learning resources, expand in new campuses
- NPE shall have provisions to allow schools/sponsoring bodies of the schools to withdraw a nominal return of 18% p.a. on their capital employed

- New policy shall allow schools to be set up by companies as well and also shall facilitate ways for existing schools to convert from Societies or Trusts to Company format.
- There shall be provisions to allow existing schools to break their current single structure into a 'Prop-Co' and 'Op-Co'. Schools sitting on premier land and infrastructure, have no room to leverage the same for improvement or expansion. With a new framework, 'Prop-Co' could give the land and building to the 'Op-Co' on long term lease. 'Prop-Co' can also leverage existing land and building to raise new capital through Real Estate Investment Trusts (REIT's)/ Infrastructure Investment Trusts' (InvIT's) that can be used for improvement/expansion of existing school as well as setting up new schools

Other Key Recommendations

School Twinning Engagement

'Twinning' or 'Pairing' of an Independent school with one or more State schools to help improve performance of State run schools through sharing of best practices by providing resources. This can be a voluntary program leading to improvement in the quality of education. This could be one of the ways to *encourage Independent schools and they could be to give relaxation under RTE Act in lieu of participation in STEP.*

Possible Engagement Areas of STEP program:

Leadership Development Programs

- Workshops and Professional development sessions for Principals and Senior Faculty members on key skills like: leadership, administrative, financial matters, effective use of new age technology and various other facets of systems and processes.
- A trained Principal would motivate teachers which in turn would boost their performance. All this could lead to *better learning outcome.*

Professional Development Programs

- Workshops and regular in-service trainings for teachers on: Classroom management, Lesson planning, Assessment, Effective use of ICT, Pedagogy, Integration of subjects and various other key teaching tools.
- Such professional development programs will enhance teachers' skills, improve quality of instructional delivery and thereby student performance

Student Enrichment

- **Scholarships:** Introduction of scholarship and other support programs for students performing well in Academics and Non-academics areas. It may help decrease the *drop-out* rate and increase student performance level.
- **Infrastructure and Facilities:** Setting up IT labs, Upgrading hygiene and sanitation, improved safety & security and providing better teaching aids. All this could lead to better student performance.

Autonomy with Accountability to High Performing Schools

- **Accreditation and Rating Framework for complete Autonomy:** Current schooling system needs a framework which can ensure a thorough evaluation of a school under which high rating achieving schools shall be given autonomy. The new policy shall have the provision that if the school is not able to maintain its rating, autonomy status could be withdrawn. This may promote excellence and innovation as schools would be motivated to perform well to build a positive image.
- **Define mandatory transparency and disclosure:** In order to grant complete autonomy to performing schools, NEP 2016 can add the provisions to cover information about curriculum offered, faculty details, student: teacher ratio, infrastructure details, sports and co-curricular activities offered, complete fee structure, average fee increase done on YoY basis and many other key aspects. It will promote transparency and better engagement with parents and also ensure that schools with complete autonomy status are accountable.

Promote more International Schools

Consider setting up an International School as an Economic Activity: India is fast becoming a global work place attracting people from around the world. Government's drive for attracting FDI and promoting '*Make in India*' is also leading to inward migration of expat and NRI community. High performing International Schools follow International Best Practices in Pedagogy and Assessments. The best practices of such schools are empowering a learner to become confident, passionate, ambitious, empathetic and resilient. Establishment of more of such schools shall result in cascading quality and best practices to national curriculum schools and can also further facilitate international mobility. National Education Policy shall include provisions to set up regulations commensurate to the nature of schools. It will ensure India's vision to become an international hub for "skilled human resource".

Public-Private Partnership (PPP) Framework

NEP shall establish a credible and viable framework for PPP model. Key points to be considered:

- Identify low performing state/municipal/village schools and create a bucket for offering them to private players on PPP
- Where feasible and viable, allow private operators to use part of the facility to run a private school alongside improving the quality and functioning of the state school
- In such models, government shall define standards to be maintained in the state/municipal/village school and allocate the budgets to the private operators. Private operators to further add to the budgets through the surplus generated from the parallel school and improve standards and quality.
- For schools where such parallel schools are not feasible, government shall consider offering '*Viability Gap Funding*' to the private operator for making a reasonable return of say 15% PA

True Sense of Inclusion

- Special Need or Inclusive School needs more sensitivity than just a policy document. NEP can highlight the importance of the following the true spirit of Inclusive School. The inclusive schools need compassionate and empathetic management who understand the support that is required by the teachers. All personnel in the school need to understand how to handle children with special needs. Parents' knowledge and skill building will also help in making the programme run smoothly.
- An advanced curriculum framework for special need children shall be developed. More professional development programmes for in-service mainstream teachers as well as special educators, so that they can work collaboratively towards inclusive classes.
- Government shall incentivized Independent schools which are successfully following inclusion practices. They need to be highlighted and shared to enlighten and motivate others.

Linkages in Education: Curriculum and Learning

- **Levels of learning:** Students should be given the option of choosing subjects of their interests at different levels to attain mastery in a class. For e.g., a science student who is at the advanced level in Biology should also be given an option to choose accounts/law/theatre as well. Learning at different levels in different subjects would benefit the students in the long run to choose the career path.
- **Internships during High School:** Practical knowledge can be attained if students are allowed to intern with certain organization to understand the specificity of the subjects.
- **Introduction of Vocational courses in High school as part of the curriculum:** The School should introduce vocational courses like Applied Science, Nursing, Community Services, Construction, Design, Printing, Textiles and Clothing, Tourism Studies, Hotel management; Manufacturing and Industrial Engineering as school-based apprenticeships and traineeships for students in years 10, 11 and 12 to prepare the interested students for tertiary or vocational sectors. It also might

trigger interest in students to take these subjects as main stream to pursue their career options. A number of hours spent on such apprenticeships can be taken as work experience and shall be assessed.

Conclusion

India has potential to become the “knowledge and human resource hub” for global community. Government of India and its policies also highlights the fact that as a nation we thrive to become stronger on the global platform. To support the government’s initiatives and to create a holistic environment of empowerment, we need to have an education system which makes students as 21st century learners, innovators, scholars, researchers and the leaders. FICCI being the leading industry voice, will continue to work together with the government and private stakeholder to accomplish an education system which shall meet the key purpose of- helping every learner to actualize her potential and integrate social, emotional, physical, spiritual and cerebral development of a child.