



NATIONAL COUNCIL OF CHURCHES IN INDIA

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QUADRENNIAL THEME 2016-2020: TOWARDS JUST AND INCLUSIVE COMMUNITIES

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To
The Honourable Minister
Ministry of Human Resource Development
Government of India

27 July, 2019

Sir,

Sub: Response to the Draft of New Education Policy 2019 - regarding

The National Council of Churches in India is an ecumenical expression of Protestant and Orthodox churches in India, comprising of 14 million people. The Churches in the fellowship of the NCCI run many renowned schools and colleges in this country. As an ecumenical voice of the Protestant and Orthodox churches in India the National Council of Churches in India (NCCI) hereby submits its views on the on the draft of National Education Policy, 2019 which is placed in public domain for comments and feedback.

Periodical review of our education system is desirable and hence we appreciate the Government of India for the initiation in introspecting the educational system in India. The vision behind the restructuring is stated in the preamble as "...India's new education system has accordingly been crafted to ensure that it touches the life of each and every citizen, consistent with their ability to contribute to many growing developmental imperatives of this country on the one hand, and towards creating a just and equitable society on the other". We hope and pray that this new education policy may enable all the citizens of India to work for the development of a just and equitable society in which all irrespective of their caste, religion, political affiliation, gender and economic disparity will experience freedom in its zenith.

The Draft of New Education Policy (DNEP) was given to the public for evaluation and we appreciate the democratic sense that you have shown in gathering responses from different institutions, organizations, cultural groups and civil society organizations. However, we observe that since the draft was not available in vernacular languages substantial debate among our peoples could not be generated.

We however submit some of our observations as under:

1. By proposing the centralization of the administration of the entire educational system in India the DNEP supposedly weakens the federal character of India, though it claims that it fosters regional cultural as well as vernacular language systems.
2. It is proposed that the marks obtained by a student in the secondary board exams are not concerned for further studies rather the performance in the aptitude test to be conducted by National Testing Agency (NTA) is the criteria for further admissions. This adversely affects the regular study of a student since he/ she will be focussing only on NTA examination. Also, this may encourage private coaching agencies to flourish their business by exploiting aspirations of the common children.
3. The National Research Foundation (NRF) is to provide fellowship for doctoral and Post-Doctoral both for India and foreign students based on Merit and not based on principle of reservation based on social and educational backwardness. A majority of Dalit and Tribal students will be out of the purview of state funded research programmes. Scholarship on merit by overlooking the caste and class deprivation in this country will deprive access to higher education for many.
4. It will be good to promote a substantial universal outlook to the framework of the policy while seeking to draw on the rich plurality of traditions of 'Indian' within the curriculum. How 'Indian' will be interpreted will also be problem especially in a context where 'Indianness' is defined monolithically highlighting some dominant culture. The New Education Policy should have a mechanism to resist any such attempts.
5. It would be desirable to have special incentives for girls to continue their studies in a context where rural girl children especially from the marginalised sections are facing cultural anathemas to study. The present Government's emphasis on 'Beti Bechao Beti Padoo' should be structurally reflected in the New Education Policy.
6. Children with diverse sexual orientations should have a space in the NEP for continuing their studies in a non-hostile atmosphere. Therefore, a structural initiative (academic as well as infrastructural) should be proposed to help building an equitable and inclusive academic environment in schools and colleges including the provision for assigned rest rooms/ toilets.
7. Children with disability have been mentioned in the New Education Policy. We appreciate the suggestion to encourage them with scholarships. However, we would like to see the development of good supporting systems for their entire studies including scholarships to all children with disability without considering their academic merits. Also, facilities for their transport and accessible infrastructure should be included in the policy. Unless this is specifically emphasised as a policy to all educational institution the proposal of home schooling will be a way of saying that they are not part of the mainstream.

8. In the development of school complexes there appears to be a confusion on the clustering and/ or amalgamation of schools in a particular locality. Clarity in this will help in understanding the objects and reasons for the creation of the School complexes. It is hoped that this process will not infringe into the rights of the minorities to establish and run the educational institutions in different parts of the country
9. Proposal for the management of the School Management Committees (SMC) as a mechanism for community support and supervision, also under the RTE Act, is a matter of concern in its present proposed form. Functioning of all schools (government/public, private-aided and private-unaided) will be supervised by the SMC, the constitution of which is mandatory since the enactment of the RTE Act. The principal and teachers are always under the scrutiny of the SMC because of which even some dominating persons in the committee from the locality can manipulate the entire system. Our concern is how ethically right is it to implement this system in the private aided schools? Parents become de-facto regulators of schools instead of the state. Different interests within the SMC can bring conflicts and arbitrations which seriously affect the smooth running of schools. Therefore, we suggest the SMC should not be given any role in the administration and appointment in the schools. There are efficient systems already existed in India to monitor even private schools and therefore we urge the committee to enable and empower those systems to monitor the schools aided by private agencies or organizations.
10. The right of Minorities to establish educational institutions is not mentioned in the proposal. According to the constitution Article 29 and 30 religious as well as linguistic minorities have the right to establish their educational institutions in this country. It is a fact that even much before the initiatives of the elected Government in India the Church and its mission agencies put more effort in the formation of educational institutions in this country. None of them was meant to make profit rather aimed at the service of people. As it is given in all the modern and developed democratic countries, India also affirmed the rights of minorities through its constitution and hence the new policy must recognize and encourage the minority rights to establish educational institutions for their own communities and for the wellbeing of this country.
11. Clarity is needed in terms of 'correct' material – "Textbooks will aim to contain only correct, relevant material;" (P4.8.2 p. no. 102) Also, the freedom given to SCERT to choose additional materials as part of NCERT is seemed to be a good practice to foster local culture and local flavour. In both cases however the apprehension is that the possibility of subjectivity can spoil the ethos of the materials that India has chosen for long, based on secular principles envisaging coexistence of differences. Especially when we see lot of 'corrections' are taking place which in turn resulted in exclusion and inclusions by imaging some events and people as 'national' and 'anti-national'.

On account of the above and many such apprehensions that may come up in a more detailed study of the draft, we urge the Government of India to defer the adoption of the National Educational Policy and allow for more debate among all stakeholders which in turn will provide for a comprehensive policy that would have gained the trust of all across board. This will go down well with the assertion of the Prime Minister that the trust of the minorities must be gained.

The National Council of Churches in India whose member Churches have substantial experience in setting up educational institutions in different parts of the country including in remote areas and in providing quality education in the country over several decades is committed to assisting the government in facilitating a consultative process to understand and enrich the National Education Policy

With every good wish

Sincerely yours,



Rev. Asir Ebenezer
General Secretary
National Council of Churches in India

