



# **FICCI ARISE** **Recommendations** **on Draft National** **Education Policy 2019**

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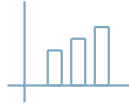
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# Preamble

Besides some amendments made in 1992 it has been 33 years since the last National Education Policy (NEP) was released in 1986. The world around us has evolved and re-evolved during this time. So have evolved the context and relevance of education at all levels. The education system and practices in our country have unfortunately not been able to keep pace. In such backdrop the Draft National Education Policy 2019 offers a number of well-reasoned and bold reformative steps in the right direction. It conveys a clear bias for change, disruptive change. This is indeed very heartening and greatly welcome.

The draft policy very well addresses most of the critical issues that daunt our current education landscape. Various change and reform proposals if implemented in true 'letter and spirit' by all stakeholders shall undoubtedly transform the overall educational eco-system in the country.

Success of a policy is purely dependent on its implement ability and implementation at grass-roots level. FICCI ARISE (FA) comprises of members and experts who have in-depth practical experience and exposure of ground level realities. FA has thus adopted the following four fold approach while formulating these comments:

1. Test various policy proposals for their on-ground implement ability and give recommendations to ensure that the reformative proposals do not fall prey to misinterpretation and/or distortion at the ground level;
2. Identify and list proposals that need to be included so as to ensure 'last-mile' successful implementation of the policy;
3. Suggest steps to reduce sharply the avoidable administrative tasks, litigation and activism in order to free up educator's time to focus primarily on improving the quality of educational delivery;
4. Objectively distinguish government's roles in education of 'Policy Maker', 'Regulator' and 'Operator'.

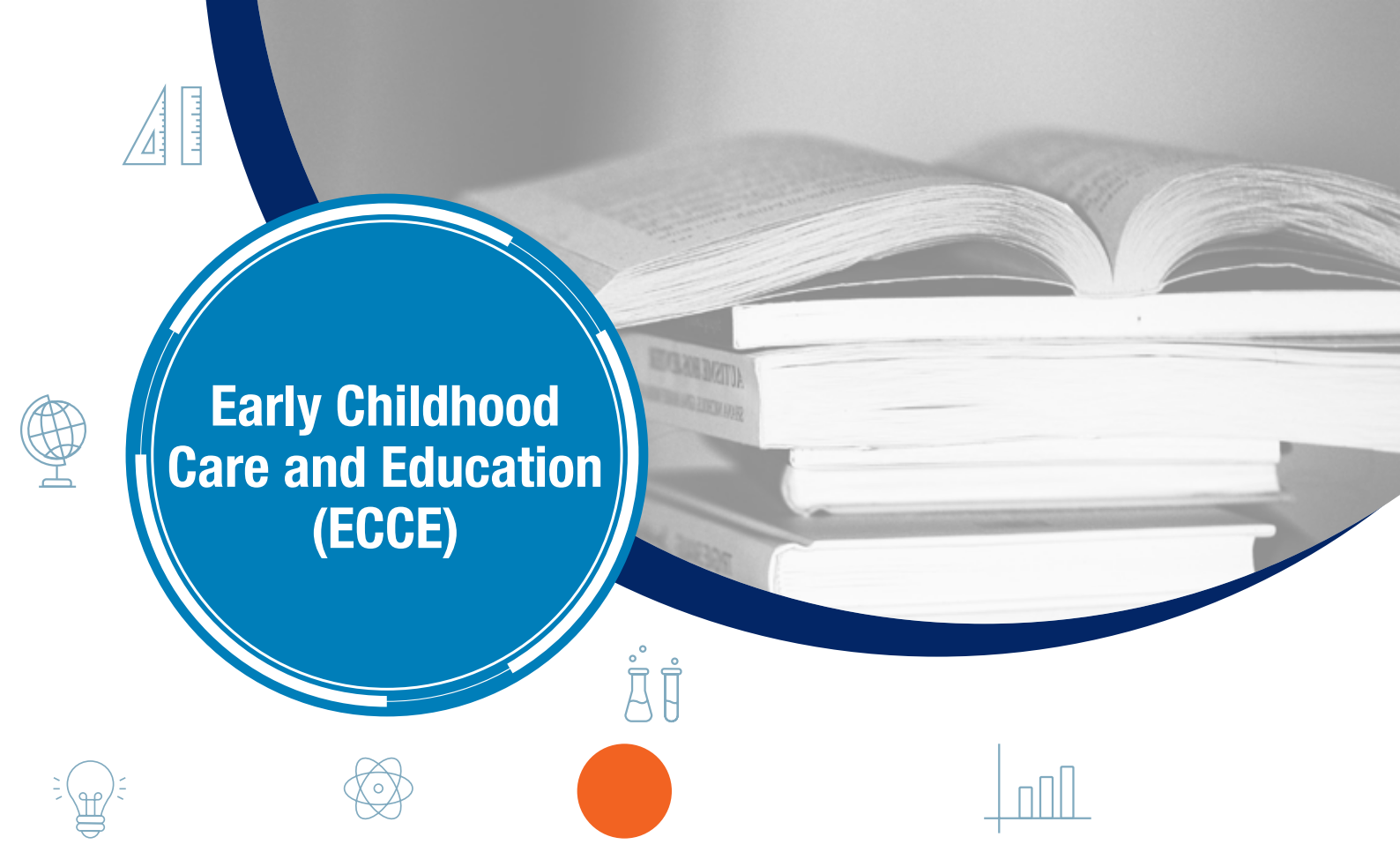
As against any major country across the world where the percentage of students attending self-financed independent schools barely reaches double digit, about 40% of children attend such schools in India. There do exist success stories in both government schools as well as self-financed independent schools. We feel time is ripe for both sectors to move beyond their respective comfort zones, build trust in each other and start aligning and collaborating for true nation building.

Over the years FA has created certain practically implementable frameworks covering various areas of school education. These frameworks are outcomes of nationwide consultations with various stakeholders, professionals and legal experts. Certain states have started adopting some of these frameworks. The draft NEP policy too mentions need of several of these. Going forward FA shall be humbled to contribute in this important area of ensuring practical implementation of path-breaking policy proposals.



# School Education





## Early Childhood Care and Education (ECCE)

FICCI ARISE (FA) puts forth high commendation for the draft NEP to rightfully recognise the importance and salience of ECCE in the wholistic educational development of every child.

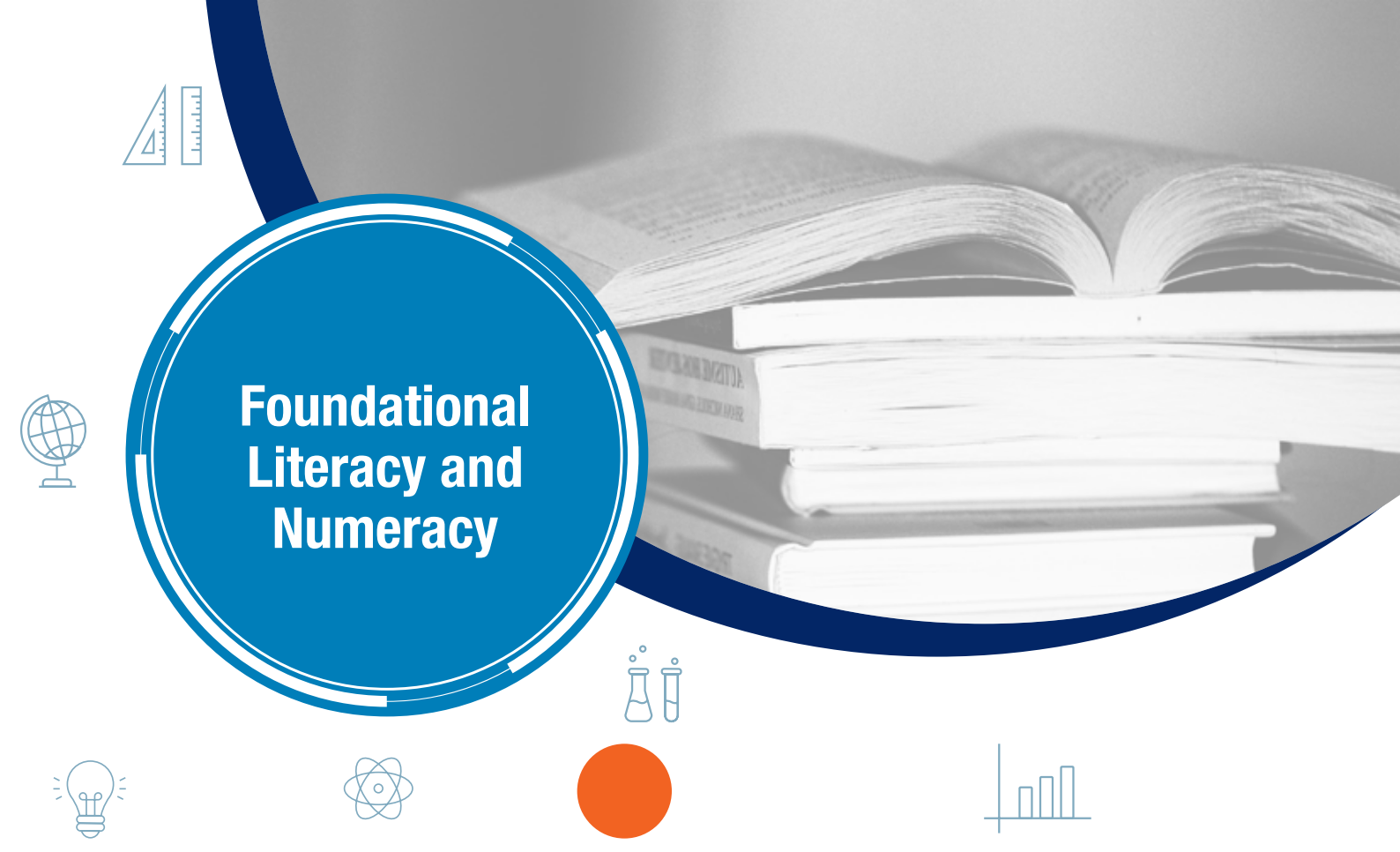
FA fully endorses extension of the The Right of Children to Free and Compulsory Education (RTE) Act, 2009 to include early childhood education. FA offers following recommendations in order to ensure that the policy achieves its stated objectives:

1. *Mandate deployment of well qualified and trained teachers for early childhood education:* 6-month special training programme for an Anganwadi worker (who could be merely 8th grade pass) is simply not enough for carrying out effective early childhood teaching – learning practices. Teachers with a minimum qualification of Diploma in Teachers Education (D.Ted) is necessary.
2. *Provide 2 caring adults for every group of 30 students in ECCE:* A Teacher assisted by a Co-Teacher. This shall enhance management and care of small children. Shall also build pipeline for developing more teachers.
3. *Formulate uniform pay scales for all teachers including ECCE professionals:* In progressive educational systems ECCE and Primary Teachers are among the most respected and highly paid. Do away with the old age practices of creating discriminatory salary scales such as PRT/TGT/PGT etc. Scales should be uniform across all levels dependent on qualification, experience and outcome of individual performance assessments. Uniform scales shall attract the best and passionate professionals to ECCE.

While this proposal has potential for creating long term positive impact, it shall also result in increase in input costs for existing schools. Existing schools should be allowed to recover such incremental cost by making commensurate one time increase in their fee structure.

By engaging national and international experts, FA would be pleased to contribute in following areas:

1. Development of an excellent curricular and pedagogical framework for early childhood education (1.1)
2. 'Training the Trainer' for Faculty development for ECCE (1.5)
3. Instituting an effective and quality regulatory system for ECCE (1.6)



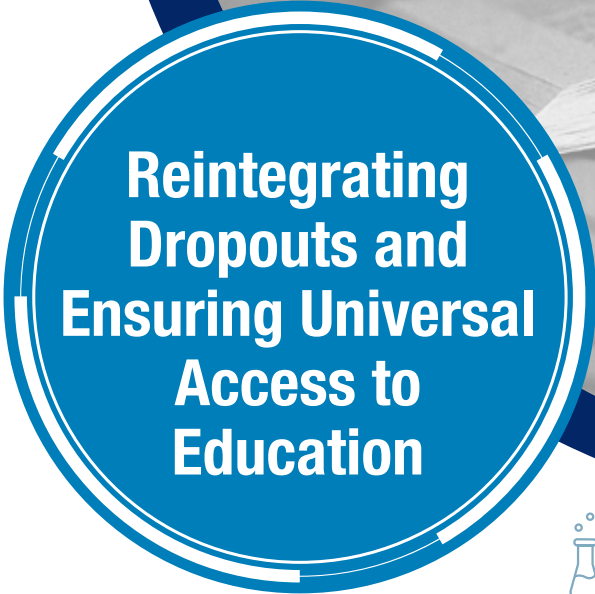
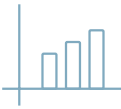





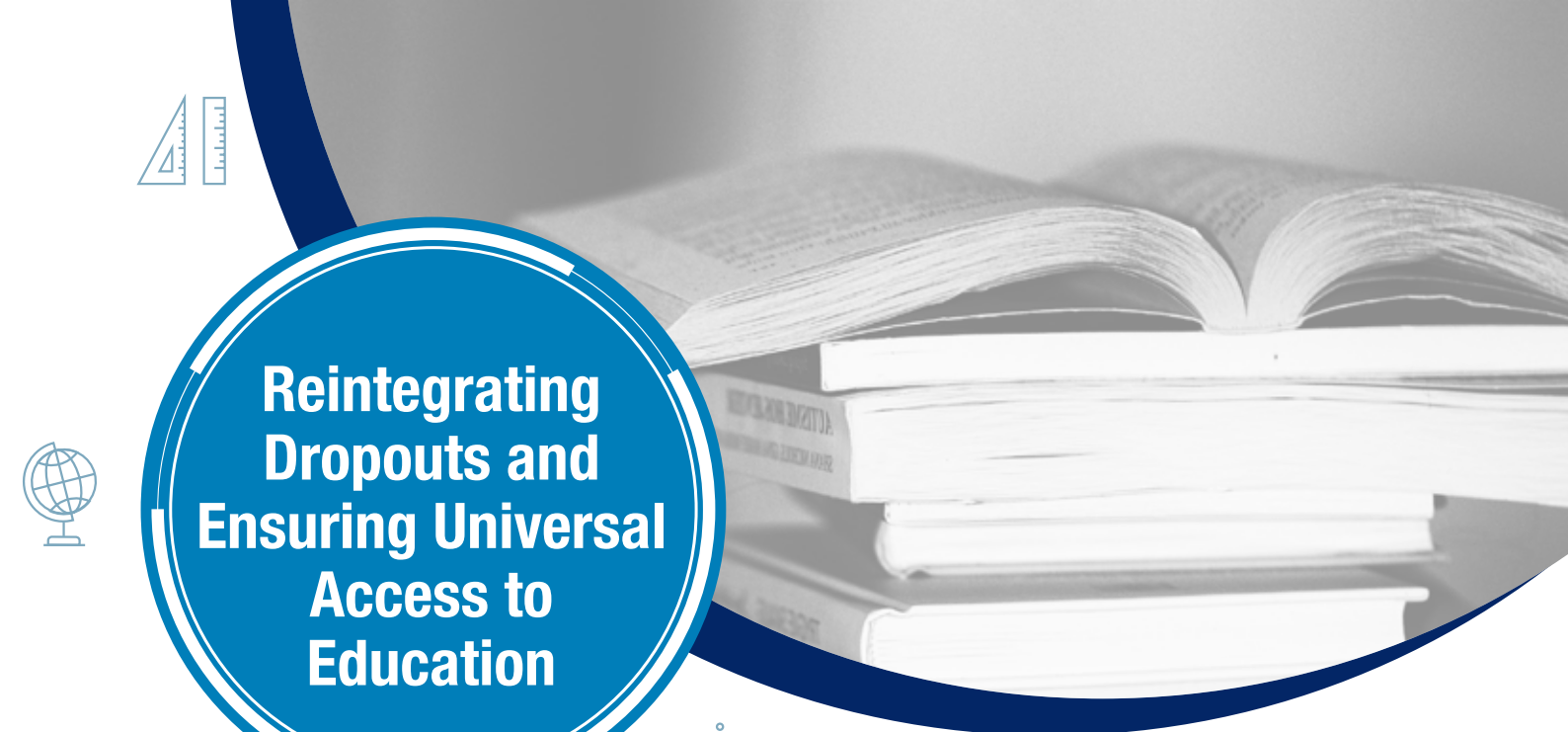
## Foundational Literacy and Numeracy

FA puts forth high commendation for rendering right importance to this very important area. FA particularly hails proposals such as expanding mid-day meal (2.1), activity based fun and engaging approach (2.2), National Tutors Programme (2.5), Remedial Instructions Aids Programme (2.6), Encouragement of large-scale community and volunteer involvement (2.7), Parental participation (2.12) among others.

FA also recommends gamification of learning particularly for children of this age group. Light, colour, sound and action makes learning more exciting.

By engaging national and international experts, FA would be pleased to contribute in following areas:

1. Designing workbooks on language and mathematics (2.3)
2. Redesigning of teacher education for foundational literacy and numeracy (2.13)



# Reintegrating Dropouts and Ensuring Universal Access to Education

FA puts forth high commendation for this much needed effort to ensure that no child is left behind. While hailing most of the clauses FA offers following recommendation:

Do not make Secondary Stage (Grades 9, 10, 11, 12) compulsory for all students as yet (3.13): While FA fully endorses providing access for quality secondary stage schooling to all children, it strongly recommends not to make the same 'compulsory' as yet. At this juncture FA recommends to make 'compulsory' the following stages only:

1. Foundational Stage – 3 years of pre-primary and grades 1, 2;
2. Preparatory (or Lower Primary) Stage – Grades 3, 4, 5 ;
3. Middle (or Upper Primary) Stage – Grades 6, 7, 8

Focus should be to make the aforesaid three stages of education so robust and wholistic that every child having undergone these stages be able to successfully deal with life and job expectations and complexities. There is a great deal a person learns 'on the job'. Excellent Foundational, Preparatory and Middle stage education shall enable individuals preferring to join jobs/vocations after middle (upper primary) stage to master their fields of choice.

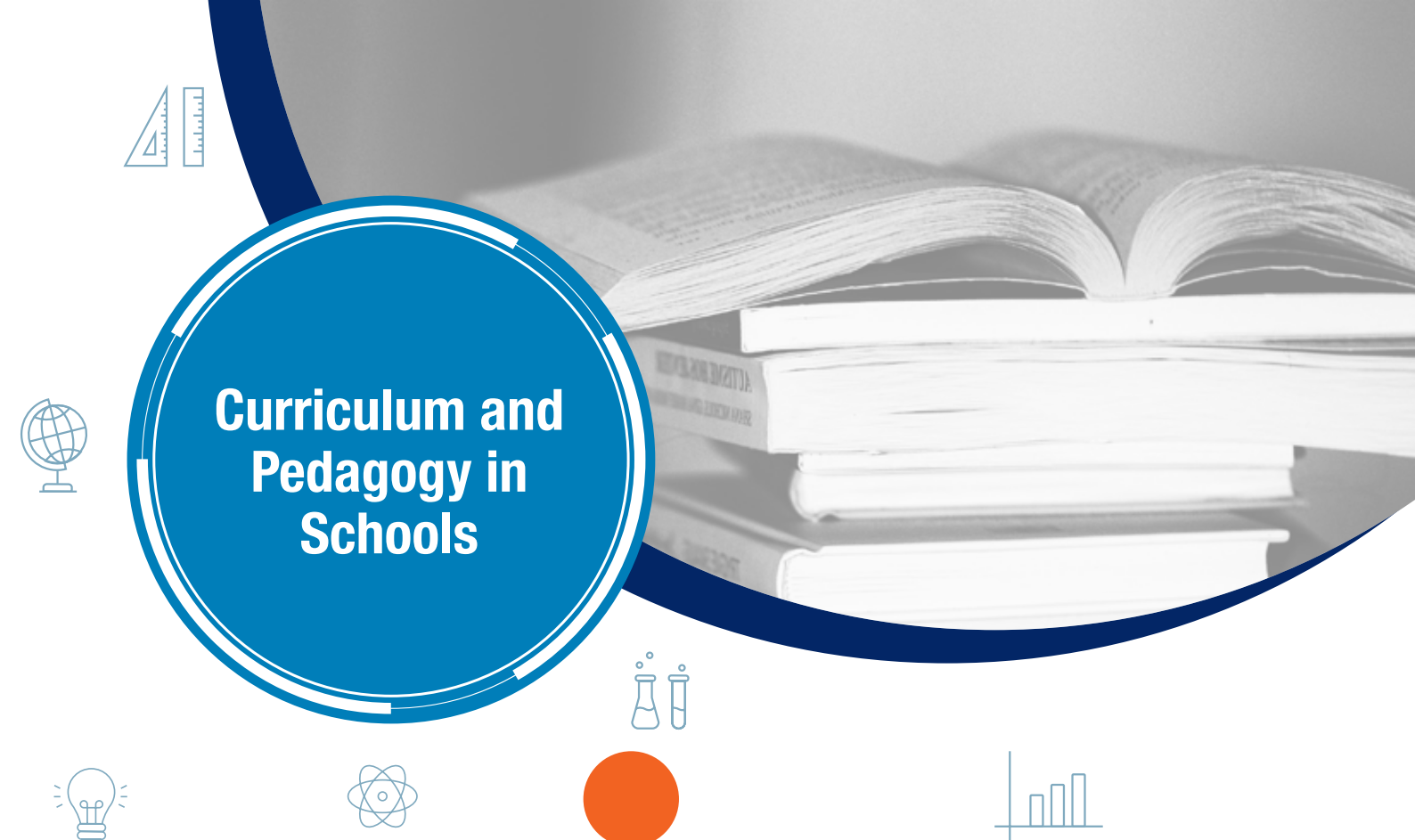
Given our population diversity and the varying needs of individuals, households and community FA strongly recommends that after grade 8 a child should be accorded the freedom to choose and pursue her/his own needs, passion and ambition. This would of course include pursuing the option of Secondary stage schooling as well.

Moreover expecting that every child graduating from grade 8 in current system would be interested and be able to successfully pursue secondary stage schooling is unrealistic. Appropriate ground needs to be prepared for the same by effectively implementing NEP proposals. This is going to take time. In about a decade the system would hopefully start producing students who would be better prepared and probably eager to pursue secondary stage education effectively.

While, Target SDG 4.1 of the Sustainable Development Goals envisages universal primary and secondary completion as a path to relevant and effective learning. Critics of the target believe a push towards universal upper secondary completion distracts from the priority of at least nine years of basic education for all. With goals for access and quality not met at the elementary level in India right now, it would be prudent to focus on the first nine years.

FA can productively contribute in the amendment of RTE act in following areas (3.12):

1. Devising norms for safety of children (both physical and psychological). FA has already done some elaborate work in this area.
2. Defining minimum standards of learning outcomes



# Curriculum and Pedagogy in Schools

## 4.1 A new curricular and pedagogical structure for school education:

FA welcomes re-structuring of school curriculum and pedagogy in the new design 5+3+3+4 (4.1.1). An extremely important aspect in its implementation is to ensure seamless 'continuum' and 'progression' for a student from one stage to the next one. There do exist international best practices in this area. While doing this though, it is important to take into account the states where several schools only go up to class X. The pre-university colleges in these states have played a major role in taking on the responsibility of preparing students for higher education and their existence or continuous growth cannot be jeopardized in any way.

FA would be pleased to contribute in devising right strategies to ensure this continuum.

## 4.2 Holistic Development of Learners:

FA hails the proposed paradigm shift from 'teaching based' education to practicing the 'learning based' approach in the classrooms where student shall be at the centre of learning. To implement the same effectively, massive unlearning and relearning of teachers shall be required. Else this proposal might not achieve its objective as had happened with Continuous and Comprehensive Evaluation (CCE). International curriculums such as the International Baccalaureate (IB) and Cambridge International are considered global benchmarks for 'inquiry based learning' that fosters 'critical thinking' and 'problem solving' skills.

FA would be pleased to contribute in this area as quite a few member schools of FA are successfully practicing IB and Cambridge International and inquiry based learning approach.

## 4.3 Reduce curriculum content to enhance essential learning and critical thinking:

FA applauds the initiative.

## 4.4 Empower students through flexibility in course choices:

FA feels this reform has been long needed and hails the same. FA recommends provision of following two aspects to truly achieve the objective:

1. *Providing support in Career Guidance:* Develop a pool of career counsellors for each 'school complex' – this could also be leveraged through technology as there are several good career portals on the internet. While it is important to have generalist counsellors who can address a range of issues from academic to behavioural and socio-emotional development, there needs to be a clear thrust on specialization for career
2. *De-stream university entrance requirement for undergraduate courses* as in the United States of America



#### 4.5 Education in the local language/ mother tongue, multilingualism and the power of language:

FA acknowledges and resonates the importance and power of multilinguals in today's world. FA also echoes the right importance rendered to one's mother tongue. FA also hails the intent and strategy for reviving some of the classical and ancient languages of our great nation. While applauding the overall approach towards languages FA wants to make following recommendations:

1. *Select appropriate age for giving exposure to three or more languages in schools (4.5.3):* Besides native language (mother tongue) and English, the exposure to third language should ideally start from Middle (Upper Primary) stage. It would not be conducive to overload children in the Foundational and Preparatory (Lower Primary) stages with a 3rd language. At this stage they are in the process of acquiring several other skills and aptitudes. During this stage basic discipline, culture and importance of languages should be inculcated in students so as to equip them with the right aptitude and understanding to take on the third language from grade 6 onwards.
2. *Greater flexibility in the choice of 3rd language (4.5.9) and (4.5.10):* FA believes in our tradition of 'Vasudeva Kutumbkam' (whole world is a family). While retaining and celebrating our heritage, culture and linguistics we should also empower our children to interact with the larger world, which is becoming increasingly boundaryless. FA recommends that besides the native language (mother tongue) and English, every child in grade 6 should be given freedom to choose the third language from the pool of all other Indian and Foreign languages. Expecting school going children who want to pursue a foreign language to take it up as 4th language along with various other subjects is not realistic.

Flexibility can be granted for a student to drop one of the 2 languages that the student had been studying since inception in grade 9 and instead opt for another Indian or foreign language for the remaining 4 years of schooling.

There are several families who are nationally mobile because of transferable jobs etc.. Mandating a child to adopt the native language of each of the state/region that the child goes to is not feasible.

Several foreign nationals are studying in International schools. Insisting these students to learn two Indian languages will be too much and not be feasible.

#### 4.6 Curricular integration of essential subjects and skills

FA endorses all the ten essential aspects that are identified to be integrated within the school curriculum. Putting an effective mechanism/ framework for their seamless and natural integration with the curriculum is going to be the key. We do not need to re-invent the wheel. IB curriculum offers 'IB Learner's Profile' that comprises of ten similar mandatory learning attributes that all students need to acquire. The integration and measure mechanism created by IB in various stages of curriculum delivery is a perfect example of successful implementation of this concept.

FA would be pleased to contribute in this area as quite a few member schools of FA are successfully practicing IB and inquiry based learning approach.

FA also recommends to include the following in the list of essential skills:

1. Responsible and Empowered Citizenship – including political, legal and financial literacy and civic etiquettes
2. Coding

#### 4.7 National Curriculum Framework

FA supports the proposal of further strengthening National Curriculum Framework and aligning the same with the path breaking reformatory proposals made in the draft NEP 2019.

## 4.8 National Textbooks with local content and flavour

While hailing the proposal for reforming the current textbook content and improving their overall quality and relevance FA wants to make following recommendations:

1. *Choice of textbook selection should be with the teacher:* Textbook is one of the tools or path that a student takes to prepare herself/himself for achieving defined learning outcomes. Learning styles and teaching styles are different for different individuals. While offering the option of high quality textbook through NCERT to all schools at very affordable prices, teachers should be given independence to choose the appropriate textbook conducive for their learning group.
2. *Flipped Classroom Learning:* We live in an era of information overload. We are often bombarded with ‘fake news’ or one of the several possible interpretations of a fact or an event. It is extremely important in today’s times to nurture a critical thinking mindset where a student can herself/himself un-peel the information, read between the lines and develop the right understanding in an un-biased way. In order to achieve this the classroom time should be dedicated more for discussions, debates, analysis and projects.

## 4.9 Transforming assessment for student development

Pedagogy in essence flows backwards as it has to pass the test of assessment. Proposals for introducing formative assessments including ‘open book tests’ (4.9.2), assessments in an adaptive computer assisted manner (4.9.3) etc are much appreciated. FA hails proposed initiatives of bringing out assessment reforms and affording students flexibility (4.9.5). The proposal for ‘National Testing Agency’ conducting universal college and university entrance examinations (4.9.6) shall create a much needed level playing field. Census examinations in grades 3, 5 and 8 (4.9.4) shall become a good measure of large scale assessments.

FA strongly recommends review of proposal regarding ‘Restructuring of Board Examinations’ and mandating a total of 24 board examinations + 15 local ones in 4 years of secondary schooling. While the intent to render a holistic approach and standardisation may appear reformative on paper, they shall lead to implementation nightmare, over-standardisation, over-generalisation and over-burden:

1. Practical feasibility for a Board of Assessment to conduct multiple grade level examinations and their objective assessments every six months should be very carefully assessed. Same appears impractical in today’s context;
2. Different genre of schools practice different pedagogical models and their internal assessments are accordingly structured and designed. Standardisation of semester end assessments shall discourage innovative practices and draw everybody to a lowest common denominator;
3. While we have to surely move away from early specialisation, mandating 40 courses for secondary students shall lead to over-generalisation. This shall lead to severe knowledge gaps during specialisation phase in later stage tertiary education.
4. The society is obsessed with ‘board examinations’ and ‘board scores’. Board examinations every semester shall further fuel this mindless race and burden the students much further

FA wants to present following recommendation and possible contribution:

1. *Subject bouquet of mandatory and electives:* Define bouquet of 6-8 subjects for lower secondary level and 5-6 subjects for upper secondary level. Such bouquet should offer flexibility of subject choice to the student instead of hard streaming the same;
2. *Allow specialisation through two levels of subjects:* At upper secondary level offer subjects at two levels, ‘standard’ and ‘higher’. Students could choose three out of six subjects at higher level;
3. *Board guided – schools conducted semester examinations:* Board of Assessments could provide a guide for setting up and conducting semester level examinations. Schools could refer to the guide and formulate and conduct their own examinations;
4. *Board conducted school examinations for graduating from lower and upper secondary:* Board should conduct only the graduating level examinations for lower secondary and upper secondary
5. *Flexibility for students to take annual board examinations in either of two years:* Allow students to finish one or more subjects within one year of the two year program in lower and upper secondary respectively enabling the student to lay higher focus on remaining subjects in the final year.

6. *International Benchmarking*: an appropriate number of randomly selected students from each state should be made to take international benchmarking examinations such as ACER in grades 3, 5 and 8 to benchmark their learning levels against their international peers.
7. *Proposed assessment and examination reforms for CBSE*: At the behest of CBSE, FA had recently undertaken a project for recommending assessment and examination reforms for grades 10 and 12. FA had constituted an expert committee comprising eminent educators and examiners from across the country and across various examining boards including international boards. The comprehensive report along with sample test papers has been compiled and presented in a timebound manner. FA would be humbled to contribute further in this area.

#### 4.10 Support of students with singular interests and talents

FA hails the concept and proposals.

FA recommends a facilitative mechanism for 'Talented' and 'Gifted' students in Sports or any Art forms enabling them to earn credits so as to reduce academic burden and focus and harness their innate natural talent. Such practices shall go long way in producing Olympians and Internationally acclaimed artists in both visual and performing arts.





# Teachers

## 5.1 Effective teacher recruitment and deployment

FA presents high commendation for all the ten initiatives listed to bring in reforms in teacher recruitment and deployment. FA wants to additionally recommend the following:

1. *Hire only the best and most suited:* While para 5.1.4 that lays down inclusive approach in teacher hiring for ensuring diversity and upliftment of Under Represented Groups (URG) is well intentioned, FA wants to convey caution that such initiatives should not lead to dilution in teacher quality. Lowering entry requirements in teachers shall surely uplift the individual but it shall at the same time prove disadvantageous for students who would be left with a mediocre teacher.
2. *Make Teacher recruitment a 'National Mission' to attract the best and brightest:* Rightfully attach glory, pride and respect to the teaching profession as done for armed forces. Run a national campaign to attract the best and the brightest to this profession.
3. *Demystify the myth of teaching being a 'soft' career option:* Discourage such applicants who choose teaching as a 'softer' career option. To truly achieve the objectives of the draft NEP, hardworking and passionate professionals are the need of the hour.
4. *Give importance to 'Attitude' over 'Skills':* Test the 'learning' aptitude of a teacher herself. How willing is the teacher to learn and practice new techniques and pedagogical approaches. How adaptive she/he is to different environments and in use/integration of technology.
5. *Encourage and facilitate mid-career switches from other professions into teaching:* There is an increasing trend, especially in urban areas of successful and accomplished working professionals and ex-defence personnel wanting to switch to teaching. Their motivation is not employment but 'giving-back' to the society. Experience proves that such people make excellent teachers as they come with right passion, motivation, discipline as also the practical worldly knowledge. Flexibility and facilitation should be granted for such professionals to become regular full time teachers. Making such professionals undergo a 2 year B.Ed. program (5.5.2) might discourage many. An appropriate mechanism should be put in place where in a time bound manner such teachers obtain on-job training and attain a teaching qualification.

An appropriate mechanism shall be devised to recruit such passionate people with different set of service rules. It may be considered to limit/cap the maximum strength of such teachers in a school to 10%.

## 5.2 School environment and culture that is conducive to quality education

FA hails all the initiative and proposals in this section

## 5.3 Continuous Professional Development

FA endorses the need and proposals for CPD.

FA can contribute in this area through its member schools. FA member schools that conduct regular professional development sessions can invite few selected government school teachers to participate in their internal workshops.

## 5.4 Career Management

FA presents high commendations for various proposals in this section. Parity in service conditions and uniform salary and promotion structure across all stages of school education (5.4.2); building teacher accountability through tenure track system (5.4.1) and Periodic performance appraisal of teachers (5.4.5) are bold reformatory steps in particular that have potential of creating a long lasting positive impact.

## 5.5 Approach to Teacher Education

FA hails various reformatory proposals in this section





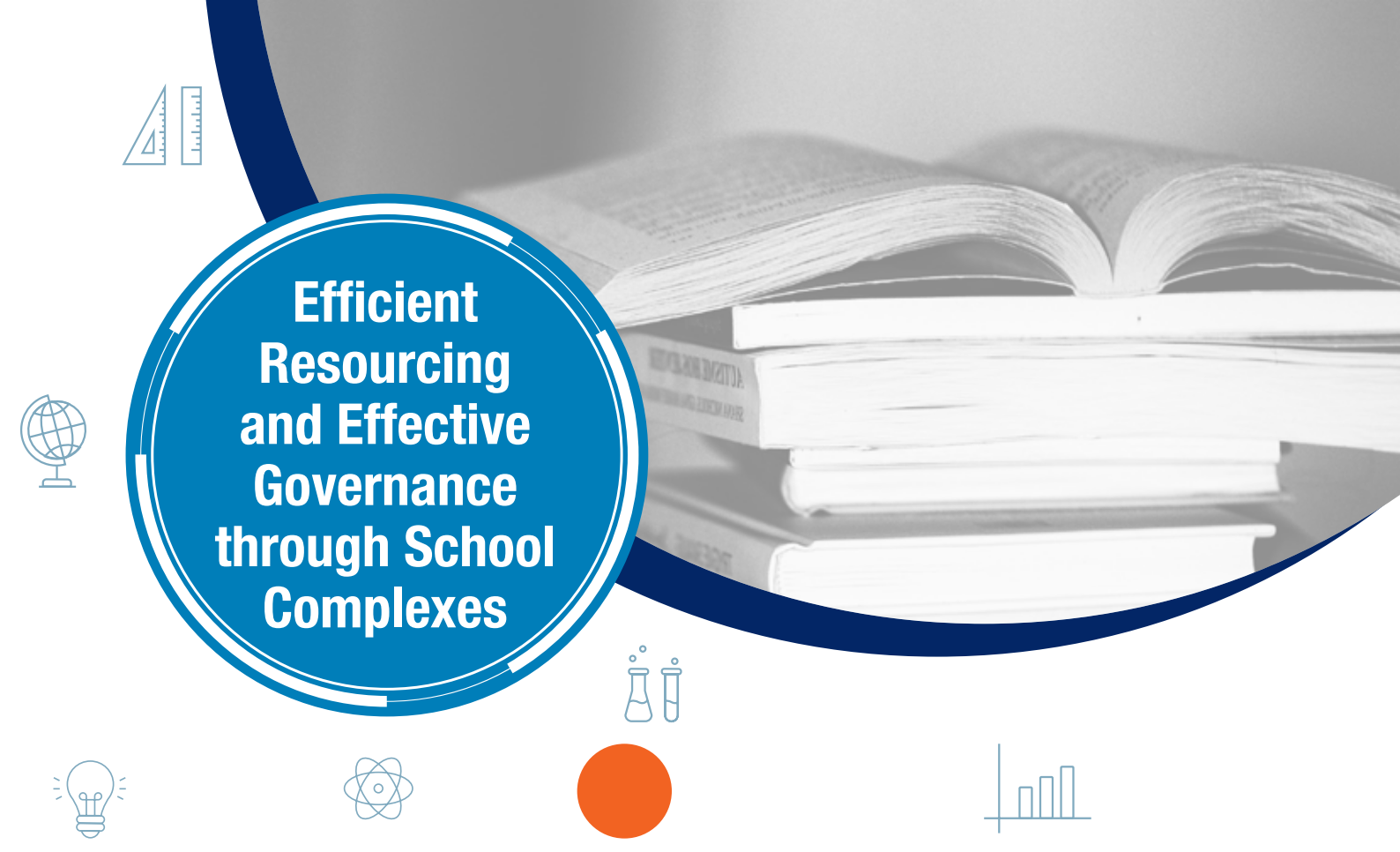
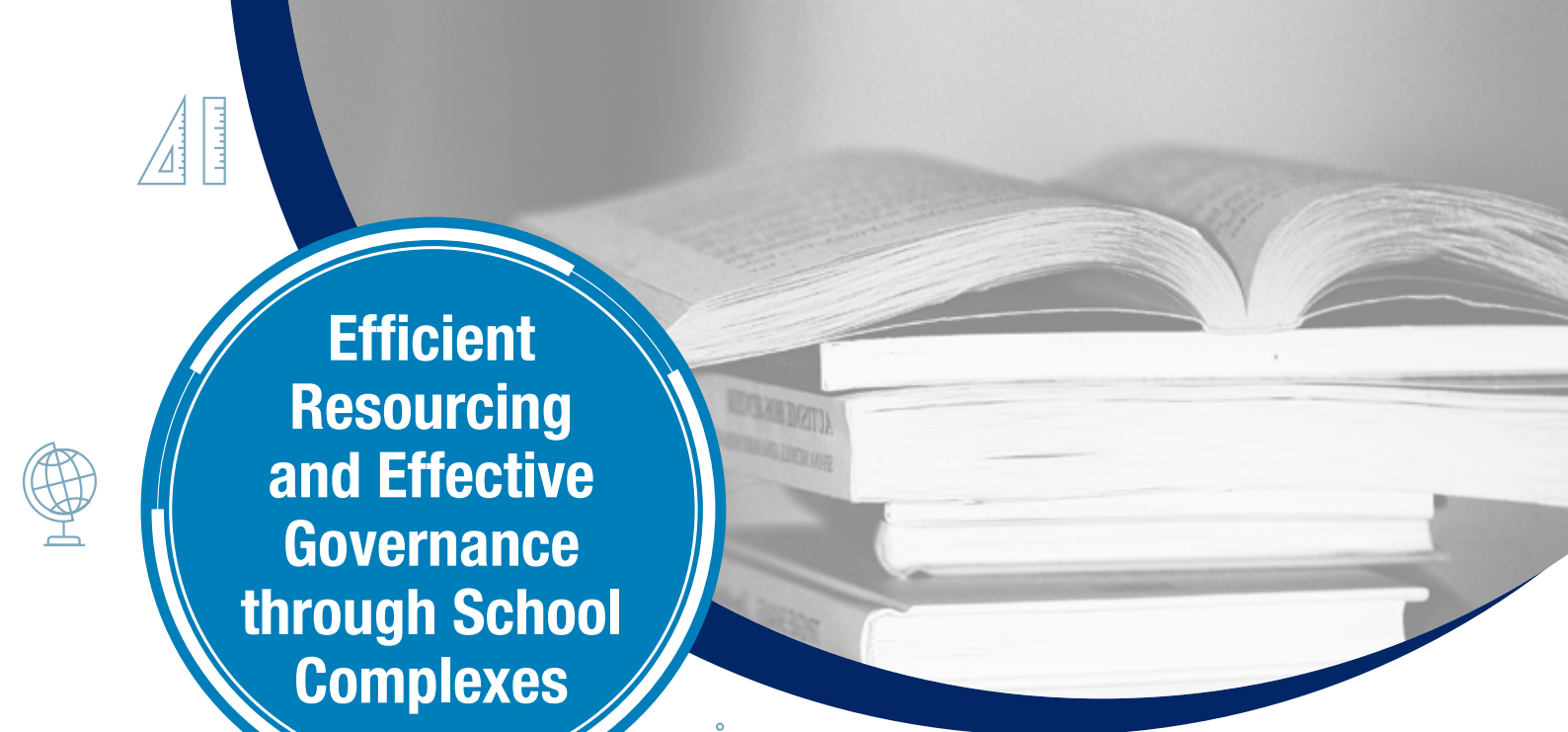
## Equitable and Inclusive Education

FA hails and supports various initiatives and proposals listed in sections 6.1 to 6.7

### 6.8 Education for children with special needs

While endorsing various proposals made in this section FA recommends the following:

Create clear distinction between children having physical challenge (physical disability) and children having learning challenge (disorders such as dyslexia, dysgraphia, dyscalculia etc): Both require absolutely different kind of intervention and support. While the needs for the former (physically challenged) have been elaborately addressed in the policy it is equally important to address the latter too. Across the country it is very common that a learning disorder goes unnoticed for years and some thing that could have been repaired (if diagnosed and addressed at right time) goes unnoticed to become a terminal deficiency. It is extremely important to educate, expose and sensitise all teachers of all schooling stages to identify learning disorders, if any in a child. Special educators trained in dealing with learning disorders should be made available as a common pool in every school complex. Identified children should be referred to such special educators. Appropriate testing should be done and individualised support should be provided to educate such children. Success stories should be created by main streaming such children after adequate intervention to the extent possible.



## Efficient Resourcing and Effective Governance through School Complexes

**7.1 – 7.4.** It is really heartening to note that the draft NEP has included one of the long standing recommendation that FA of changing the access approach from ‘immediate neighbourhood’ to ‘Cluster’ approach. FA further endorses various proposals made in sections 7.2 - 7.5. If implemented in letter and spirit by way of creating such complexes as ‘semi-autonomous’, this reform shall lead to far reaching positive impact. FA proposes following additional recommendations:

1. Define minimum cohort of number of students, grade wise and school wise for operating any school
2. Adopt ‘Cluster’ approach for thinly populated schools – Within a radius of 25km transform the most populated school as ‘Model School’. Equip the same with adequate human resources and teaching aids. Provide for transport facilities to ferry students from the neighbourhood.
3. Connect leader schools of various school complexes with video conferencing
4. Funded schools must be held accountable to meet some non-negotiable data points such as student enrolment and attendance, teacher attendance, level of learning outcomes etc

### **7.5 Effective governance through school complexes**

Effective leadership and governance shall be the key for success of school complexes. In this regard FA wants to make following recommendations:

1. *Head of the school complex:* The Principal of the secondary school in the complex who would be nominated as the head of the school complex should be very carefully chosen. Only such candidates who possess educational, administrative and financial acumen should be made heads of school complexes.
2. *Create a civil services cadre for school leadership:* Much in lines of other areas of civil services, the nation needs to seriously consider creating a civil services cadre for creating leadership in schools.
3. *Head of Administration and Co-ordination:* Administering and co-ordinating collaboration and exchange within schools in a school complex is going to be a major and full time task. Timely communication and follow up shall be the key. It would be extremely important to designate a Head of Administration and Co-ordination for each school complex who functions and reports to the Head of the School Complex. While ensuring smooth operation

this shall also free up the time of Head of School Complex from administrative and follow up tasks.

4. *Information and Communications Technology (ICT) Facilitator for each School Complex:* Merely providing ICT equipment shall not work. It is a proven fact globally that it is adults and not children who are resistant to ICT interventions. Major hand holding and motivation is required in this area. FA recommends appointing a passionate ICT facilitator for every school complex. The selection of such facilitator should be done carefully. Large and reputed IT firms could be involved in this process.
5. *Social Entrepreneurship and NGO support:* There are number of NGO's and organisations throughout the country such as 'Teach for India' who are doing remarkable job at grassroots level for improving the learning outcomes in under privileged schools. FA recommends promotion of such 'social -entrepreneurship' endeavours by attaching them to certain school complexes.
6. *Role of DEO, BEO, BEEO etc:* The entire district machinery should be totally focused on delivery of education to public schools and making the concept of school complexes a success. They should dedicate their time towards resourcing, faculty development etc. They should also initiate some sort of healthy competition between various school complexes within a district.

### **7.7.1 School Management Committees (SMCs) as a mechanism for community support and supervision**

FA strongly recommends review of the SMC concept as provided in the RTE Act and as illustrated in 7.7.1 of the draft NEP. Time has proved this to be a mere theoretical proposal that has largely failed in practical implementation. Ground reality is that SMC's in most of the schools are either dysfunctional or have become local political power centres that have further weakened the school leadership.

P5.4.5 of the draft NEP itself states 'It will always be important to remember that empowerment and autonomy are preconditions for true accountability – a threatening environment is the nemesis of sustainable quality". Multiple accountability of a school Principal to the SMC, DSE, DEO and the Head of School Complex will only compromise her/his levels of authority and motivation.

Schools can be effectively managed only by knowledgeable administrators and competent school Principals. The accountability or performance assessment of a school principal that also includes technical, pedagogical and management matters cannot be supervised by SMC's (P7.7.1) that are largely comprised of such members who aren't education professionals. Such SMC's cannot in any way be assigned to play a central role in performance management of teachers and head teachers as proposed in P7.7.3

FA acknowledges the need for involvement of parents in school affairs. In order to make this a fruitful engagement FA recommends the following:

Composition of SMC's in Public Schools:

1. Chaired by the Head of School Complex
2. The Head of the School as an ex-officio member;
3. One parent, who is a representative of the parent- teacher association;
4. One teacher from primary school and one teacher from the post-primary school, nominated each year by rotation;
5. A representative of the DSE;
6. Two other persons who are persons of eminence and repute in the field of education and of whom one shall be a woman;

Such SMC's can be assigned more than one school within a school complex.

Setting up Parent Teacher Associations (PTA's) in public schools: Mandate formation of PTA's in all schools and define it's roles as follows:

1. Make parent-teacher consolation possible individually, as well as in a group.
2. Arrange for parents to visit the school on appointment days and discuss the progress of the children.
3. Mobilize community resources for the welfare of children.
4. Provide opportunities to the teachers and the parents to meet on an equal footing and discuss the problems of their children in order to ensure their welfare.
5. Increase co-operation and better understanding between parents and teachers.
6. Arrange for social get together and program of recreation for parents and teachers.
7. Organize activities for the welfare of the children.





# Regulation and Accreditation of School Education

## 8.1 System architecture and roles of school education system

FA puts forth very high commendation for the overall spirit that 'Regulation must invigorate India's school education system' and hails the proposed 'system architecture' that clearly distinguishes each of the three important aspects that the state has to play, those of 'Policy Maker', Operator' and Regulator'. In fact this is in line with long standing recommendation of FA. FA fully endorses the following tiered architecture:

- Policy Maker – FA strongly recommends that each state should set up 'Rajya Shiksha Ayog' as proposed in the draft NEP.
- Regulator – FA strongly recommends that each state should set up an autonomous 'State School Regulatory Authority' (SSRA) at complete arm's length from the government. SSRA should perform regulatory functions based on the policies promulgated by RjSA/RSA.

Existing regulatory mechanism should be completely overhauled. A radical shift is needed from inspector led policing to transparent regulation that is based on mandatory disclosures and self-regulation. The Model Code developed by FICCI ARISE could provide useful reference for such progressive regulatory regime.

- *Operator*: FA strongly recommends that the current set up of DSE in each state should only focus on improving the functioning and raising level of learning outcomes in public schools. Their intervention in a school should be 'facilitative and complimentary' and not 'inspectorial'. The goal of the DSE should be to create a healthy competition between public schools and private schools.
- *Academic Support Institutions, SCERT, CRC's, BRC's DIET's etc*: FA hails the functions and vision laid down for NCERT and SCERT and other academic support institutions and particularly applauds the proposal that 'all curricula will be reviewed and revised every 5 years'.
- *Boards of Assessments*: FA greatly applauds the proposal for relieving BoA's from affiliation related work so as to empower BoA's to lay undivided focus on ensuring quality and perform their core function, 'assessments'.

FA strongly feels that unless BoA's have a role in laying down syllabus and curriculum, the objective for assessment reforms cannot be achieved. Detaching BoA's completely from these functions is not appropriate and would prove to be a mis-guided approach. Progressive BoA's who are well equipped and motivated to keep updating syllabus and curriculum would suffer as they shall have to match the generalised pace.

FA also strongly recommends that all BoA's should objectively create a qualitative list of minimum basic criteria such as PTR, PD of faculty etc that schools desiring to adopt such BoA's should maintain.

Promoting multiple, including international BoA's and paving way for establishment of new BoA's in both public and private sector is also welcome.

FA further recommends that in order to ensure unambiguous implementation of the proposed system architecture, it should be clearly defined as to which all agencies a public school or a private school shall be required to deal with while carrying out its operations as follows:

- Public Schools: DSE, SSRA, Learning support agencies such as CRC's, BRC's, DIET's and BoA's
- Private Schools: SSRA and BoA's

**Funding:** Besides the above three roles, government also plays the role of 'funder' of school education. The allocation and spend for school education has been increasing regularly. However there is little impact on ground in terms of level of learning outcomes. Main reasons for the same are lack of 'accountability', absence of 'competition' and non-availability of any 'incentive' for good performance. FA recommends a radical shift in the funding policy for schools. In line with the DBT scheme successfully practiced and promoted in several areas FA recommends shift to student based funding from school based funding by introducing Voucher System for students. This shall bring accountability, create competitive spirit and provide incentive for good performance.

### 8.1.8 Board of Assessments

International schools also offer education to several foreign students living in the country. Making two Indian languages mandatory for them is neither practical nor feasible. FICCI ARISE strongly recommends not to make it mandatory for international schools to mandatorily offer two Indian languages.

## 8.2 Accreditation for autonomy with accountability

FA hails the overall spirit of various proposals made in this chapter. FA would like to offer following recommendations and contributions in this area:

1. *Developing of SQAAF and LSS:* Through a national level consultative process that extensively involved eminent experts and regulators from both the government and private sectors, FA has developed "Self - Financed Independent Schools (Recognition and Fee Regulation) Code". FA had retained eminent legal firm 'Shardul Amarchand Mangaldas' for devising the same. This code is an outcome of extensive study and analysis of the present regimes prevalent in various states as also various court verdicts over the years. The code offers comprehensive accreditation and disclosure norms. Certain states have examined the code and have already started adopting the same. FA strongly recommends to consider the model code while devising the SQAAF framework. FA stands committed to facilitate consultations with eminent legal and other experts in this regard.
2. *Developing a credible third party School Rating framework:* FA strongly recommends setting up a third party 'School Rating' framework. FA has in fact created a task force and is already in consultations with QCI and NABET to develop the same. EY has been retained as the international knowledge partner. The proposal is to create an objective 'tiered' rating framework for different genre of schools in the country. The ultimate rating shall be an outcome of every school's performance on different 'Standards' that are further broken down into various 'Principles' and measured in scores. The outcome of such rating exercise would be:
  - i. Set of Commendations: celebrate areas where the school is doing well
  - ii. Set of Recommendations: identify areas where the school has scope to work and improve quality
  - iii. Rating score

There already exist several successful examples of the same in various progressive countries. FA proposes that NSRA approves such rating framework. The NSRA further empanel credible third party independent agencies to carry out the ratings – much like it happens in the banking and finance sector. SSRA's in the states could ensure that each school undergoes a rating process in a 5 year cycle. SSRA's should maintain a public website where outcome of such ratings are displayed.

The 'Rating Framework' shall ensure the following:

1. Self-accreditation (8.2.3) shall be part of the rating process, in fact it is the starting point in such processes;
2. The process shall involve deputation of practicing educators from peer schools;
3. The outcome of such process are more meaningful than an audit as it
  - Creates aspirations in schools to go up the rating ladder
  - Specifically guides the schools on the areas of improvements
4. Provides an objective assessment tool for parents and regulators about the school

### 8.3.1 Regulation, Accreditation and Oversight of Private Schools

FA recommends the following:

The centre should prescribe a 'model code' for establishment, accreditation and regulation (including fee regulation) of self-financed independent schools for states: While the proposal in 8.3.1 proposing identical regulatory framework for public and private schools might be well-intentioned FA strongly feels that implementation of the same at ground level at this stage is an unrealistic expectation. There are several factors that differ substantially between schools that are public funded/aided and ones that are self-funded. These need to be dealt with differently. There shall always be differing approaches in areas such as staff employment and remuneration structure, retirement benefits, performance assessments, promotion matrix, accountability requirements, budgeting, reporting lines, fee related matters, LSS requirement, management structure etc.

While over the years the number and spread of independent schools has grown multifold, in most of the states the regulations that were originally framed to govern government schools extend/continue to regulate independent schools. 'Inspectorial' regime makes hay of ambiguities that emerge by making their own interpretations. This promotes inspector raj and has been the major cause for in numerous litigations that are pending in various courts.

Different states at different times have enacted and rolled out various legislations, GO's, executive orders etc. to regulate schools. There indeed exists a maze. Several of the GO's haven't been updated/revised for decades. As we move to the new era of re-building our education eco-system it is right time for all states to enact transparent and progressive legislations to regulate schools, particularly the self-financed independent schools. Uniformity, to the extent possible, across states shall encourage progressive and reputed school chains to expand seamlessly across various states.

Through a national level consultative process that involved eminent experts and regulators from both the government and private sectors, FA has developed "Self - Financed Independent Schools (Recognition and Fee Regulation)Code". FA had retained eminent legal firm 'Shardul Amarchand Mangaldas & Co' for devising the same. This code is an outcome of extensive study and analysis of the present regimes prevalent in various states as also various court verdicts over the years. One of the major objectives behind developing this code was to make it unambiguous so that it cannot be misinterpreted or distorted at ground level and results in "Ease of doing Operations" for schools enabling them to maintain singular focus on education. The code provides for elaborate public disclosures and is based on the underlying principle of self-regulation. Appropriate grievance mechanism and stringent penalties have been provided for misconduct.

Maharashtra was the first state to promulgate a legislation specifically for self-financed independent schools.

Most recently the state of Uttar Pradesh too recognised this anomaly and while referring to FA Model Code, has enacted specific legislation around fee regulation that applies only to self-financed independent schools.

It is high time that uniform set of regulations specifically for self-financed independent schools are framed by all states for schools that are independently funded and operated. Similar, yet separate legislations could also be framed for regulating public schools.

### 8.3.4 Public disclosure of information

The "Self - Financed Independent Schools (Recognition and Fee Regulation) Code" provides a comprehensive format for schools to make disclosures in public domain. The format is so designed that it provides all the important and relevant information for parents and regulators. Such transparency shall enable parents and regulators to develop a clear understanding about the school and make informed decisions and choices. Some states are keenly examining this format. FA strongly recommends that NSRA should adopt this format and prescribe it for all states to adopt. FA shall be humbled to present this format to MHRD/NSRA.

### 8.3.5 School Management Committees for Private Schools

As already presented in comments for P7.7.1, FA strongly recommends a complete review of the composition of the SMC as provided in the RTE Act and as illustrated in 7.7.1 of the draft NEP. Efficient and progressive management of school is an extremely critical aspect and requires technical expertise. Involvement of parents in schools for schools well-being is also an important aspect. However the two are entirely different objectives and should not be mixed.

Schools can be effectively and progressively managed only by competent Principals, able administrators and eminent thinkers. It is conglomeration of such people who can provide efficient management and progressive direction to a school.

Parents too are important stakeholders in every school. Their primary interest lies in ensuring smooth, enriching and safe schooling journey for their wards. Involvement of parents should be facilitated in schools through time tested mechanism of PTA's.

The SMC's in their present form have not delivered in public schools too in last ten years.

Governance structures should not be such that create conflict of interests.

It is also highlighted that the legislature had mindfully excluded private schools from establishing SMC's in the structure that was proposed for public schools in the RTE Act. Proposing RTE recommended SMC's in private schools shall be a big misadventure that will destroy the governance structure of progressive schools.

Moreover such proposal is against the spirit of Article 19(1)(g) of the Constitution on the fundamental right to occupation. It is also against the landmark Judgment of a 11-judge bench of the Supreme Court in the TMA Pai Case of 2002, which laid down the principle that private unaided schools' Managements have to have autonomy in the running of their schools. Furthermore the proposal is against CBSE's affiliation Byelaws 2018 and the CISCE board's affiliation byelaw as also against the provisions of the Societies Registration Act of 1860

The "Self - Financed Independent Schools (Establishment and Regulation) Code" developed by FA provides for an efficient and transparent structure for school governance and parental involvement as follows:

School Management Committee: The composition of the managing committee shall consist of a maximum of seven members. Subject to the said limit, the managing committee shall include the following members:

1. A representative of the eligible educational entity (school promoting entity);
2. The head of the school as an ex-officio member with the right to vote;
3. One parent, who is a representative of the parent- teacher association of the recognised school;
4. One teacher from primary school and one teacher from the post-primary school, nominated by the management each year by rotation;
5. Two other persons who are persons of eminence and repute in the field of education and of whom one shall be a woman;
6. The remaining members, if any to be nominated or elected, as the case may be, in accordance with the charter documents of the eligible educational entity.

Parent Teacher Associations (PTA's): Mandate formation of PTA's in all schools and define it's roles as follows:

1. Make parent-teacher consolation possible individually, as well as in a group.
2. Arrange for parents to visit the school on appointment days and discuss the progress of the children.
3. Mobilize community resources for the welfare of children.
4. Provide opportunities to the teachers and the parents to meet on an equal footing and discuss the problems of their children in order to ensure their welfare.
5. Increase co-operation and better understanding between parents and teachers.
6. Arrange for social get together and program of recreation for parents and teachers.
7. Organize activities for the welfare of the children.

### 8.3.6 Fees in Private Schools

FA endorses the principles laid down in the draft NEP for fee regulation in private schools. FA condemns the arbitrary increase in school fee and promotes transparency and fairness.

The “Self - Financed Independent Schools (Recognition and Fee Regulation) Code” prepared by FA presents a comprehensive and transparent formula for fee regulation, which is exactly on the lines of what has been recommended in the draft NEP. The code provides for practical and transparent implementation of this extremely sensitive aspect.

Last year in 2018 the state of Uttar Pradesh referred to the FA model code and enacted ‘The Uttar Pradesh Self-Financed Independent Schools (Fee Regulation) Act, 2018’. By far this is one of the most progressive and transparent legislation promulgated by any state in India on this very complex and sensitive matter. It very comprehensively protects the interests of all stakeholders: students, parents and schools. The underlying principle of the legislation is self-regulation based on transparency and disclosures. Appropriate grievance mechanism and stringent penalties have been provided for misconduct. The same has successfully stood the test of time.

FA strongly recommends that the MHRD/NSRA should prescribe implementation mechanism of fee regulatory mechanism in line of what has been proposed in FA Model Code and the UP Fee Regulation Act as follows:

- Lay down mandatory disclosures for schools as proposed in FA Model Code enabling admission seeking parents to make an informed choice and decision;
- Mandate uniform fee heads as proposed in FA Model Code and UP Act;
- Allow schools to set up the fee for entry level students at all levels on their own commensurate to facilities and resources offered;
- Restrict year on year increase in school fee equivalent to the average per capita increase of monthly salary of teaching staff of previous year;
- Except for the years of implementation of revised pay commission recommendations, restrict such increase to sum average of percentage increase of the national composite consumer price index for the preceding twelve months plus seven per cent.

Private schools should be allowed to increase the fee every year based on the above formula. **FA strongly opposes the recommendation to allow fee increase every three years only as the same is impractical and shall raise problems and complexities as follows:**

- Major operational cost of every school is staff salaries that go up every year and not once in three years
- All other costs too go up every year and not every three years
- Factoring increase of three years in a single year shall lead to substantial increase in fee every three years ranging between 25% - 35%. This shall majorly and suddenly impact household budgets which will lead to complex situations
- Reasonable annual fee increase commensurate to inflation ranging between 8% - 12% is a time tested formula that protects interests of all stakeholders

### 8.3.7 Schools must be not-for-profit

FA strongly recommends a complete and practical review of this aspect.

As per UNDP estimates the total financial requirement for India to reach SDG 4 by 2030 is USD 2,258 billion, which for the years 2017 – 2030 averages USD 173 billion per year, far exceeding the current government budget of USD 51.5 billion a year for education (MHRD 2012-2015).

Preparing today’s students for industry 4.0 requires near transformation of existing schools. Significant investments are needed for setting up thousands of new age and innovative schools that shall become models of change.

Expecting timely investments of such magnitude to come solely from government and pure philanthropic initiatives is an unrealistic expectation.

The World Bank Group in a discussion paper has highlighted that private education clearly plays an important – and growing – role in many countries, especially the emerging economies.

It recommends eight ‘Good Practice Propositions’ under which private providers can operate effectively and efficiently and deliver what both the government and parents want to see – a quality education:

1. Provide a Sound Policy Framework for Operation of the Private Education Sector
2. Introduce Clear, Objective, and Streamlined Criteria and Processes for Establishing and Regulating Private Education Institutions
3. Allow For-Profit Schools and HEIs to Operate
4. Allow Private Schools and HEIs to Set Their Own Tuition Fees
5. Provide Incentives and Support for Private Schools and HEIs
6. Provide Parents and Students with Information to Help Them Select Quality Private Education
7. Establish Quality Assurance/Monitoring Processes
8. Develop the Capacity of Government to Implement Policy and Manage Private Providers

Promoting private investment in education has multi-fold benefits. Besides offering a choice and shaping our youth to become useful contributors in nation building, it also boosts overall economic activity and generates employment.

Several countries around the world, including the US, UK and China allow for-profit investment in education.

Moreover the ground fact is that over-regulation and prohibition for allowing regulated surplus has proven to be a double whammy. While on one hand it has discouraged credible long term operators to invest in this social sector, on the other it has led to adoption of opaque structures and practices by several operators.

A serious and definitive shift in existing policy is required to attract long-term responsible and patient capital in school education. In order to incentivise the corporate sector, time has come for the policy makers to recognise the need to allow for ‘cost of capital’ as regulated surplus to school promoting entities. Transparent structures such as regular Body Corporates with strict defined disclosure norms should be allowed for setting up and operating schools.

FA strongly recommends this long due progressive shift in this area of policy:

- a. Encourage schools to be set up in following three structures:
  - Government funded/aided
  - Private Charitable/ Not for profit
  - Regular Body Corporates
- b. Allow existing independent schools to switch their existing structure from trusts/societies to regular Body Corporates
- c. Facilitate economically viable and attractive PPP structures to encourage NGO’s and Corporate Sector to adopt low enrolment or low performing state schools and transform them in a time bound manner.

There is ample need and enough scope for all three structures to co-exist. This major reform shall promote social entrepreneurship. Stringent audit and disclosure norms in a Body Corporate structure shall bring transparency. More investment shall create competition and raise levels of quality and affordability. There are several ageing legacy schools where the next generation of promoting family has lost interest, several of such schools shall be revived. Government shall start collecting Corporate Income Tax. Opening up the sector by allowing for ‘cost of capital’ as regulated surplus to school promoting entities shall pull down shutters for opaque and misleading operating structures. It shall bring about much awaited transparency and cleaning up of the sector, something that GST regime has done in various other sectors.

#### **8.4.1 Extension of RTE Act 2009 to include early childhood education through secondary school education**

As presented in our comments for chapters 1 and 3 while FA strongly recommends extension of RTE 2009 to include early childhood education, FA strongly recommends not to extend RTE to secondary school education, grades 9-12.

While FA fully endorses providing access for quality secondary stage schooling to all children, it strongly recommends not to make the same ‘compulsory’ as yet. At this juncture FA recommends to make ‘compulsory’ the following stages only:

- a. Foundational Stage – 3 years of pre-primary and grades 1, 2;
- b. Preparatory (or Letter Primary) Stage – Grades 3, 4, 5 ;
- c. Middle (or Upper Primary) Stage – Grades 6, 7, 8

Focus should be to make the aforesaid three stages of education so robust and wholistic that every child having undergone these stages be able to successfully deal with life and job expectations and complexities. There is a great deal a person learns 'on the job'. Excellent Foundational, Preparatory and Middle stage education shall enable individuals preferring to join jobs/vocations after middle (upper primary) stage to master their fields of choice.

Given our population diversity and the varying needs of individuals, households and community FA recommends that after grade 8 a child should be accorded the freedom to choose and pursue her/his own need, passion or ambition. This would of course include pursuing the option of Secondary stage schooling as well.

Universal declaration of Human Rights adopted at the UN General Assembly too provides for making only 'elementary education' compulsory.

Moreover expecting that every child graduating from grade 8 in current system would be interested and be able to successfully pursue secondary stage schooling is unrealistic. Appropriate ground needs to be prepared for the same by effectively implementing NEP proposals. This is going to take time. In about a decade the system would hopefully start producing students who would be better prepared and probably eager to pursue secondary stage education effectively.

#### 8.4.2 Review of RTE Act

FA strongly hails the proposal for comprehensive and detailed review of the RTE Act. The act has been tested on ground for a decade. Unfortunately the act has not been able to meet its objectives. Neither has there been a significant rise in overall enrolment of children in schools nor has the act resulted in raising quality of learning outcomes. Forced measures to increase diversity in schools have not worked, in fact have led to greater divide and raised various social issues and complexities. Input norms have led to closure of several tiny schools which were otherwise notable initiatives by several well intentioned people. Section 12(1)(C) has also led to malpractices, corruption and litigation. No detention policy has further degraded learning levels.

FA recommends that in light of various other very progressive proposals of draft NEP such as creating the SQAAP and LSS, curricular and assessment reforms, teacher reforms etc, the RTE Act should only provide for the following:

- a. Making it incumbent on the state to provide for free and quality education to all children falling in the age groups between 3 – 18 years through its own infrastructure in a complex/cluster access approach;
- b. Making it compulsory for all children between the age of 3 to 14 years to attend schools
- c. Shift to student based funding from school based funding by introducing Voucher System for students

FA further strongly recommends complete dropping of the contentious section 12(1)C from the RTE Act. As rightly illustrated in the draft NEP 'this clause is not quite in tune with the principal of autonomy of institutions (including for student admission) in this policy, which empowers schools and trusts them to do the right thing.' Statistics clearly reveal that RTE has failed to achieve any significant increase in overall enrolment of school going children. Clause 12(1)c on the other hand has resulted in the following:

- a. Exodus of children from government schools to private schools
- b. Massive corruption and malpractices as elaborated in the draft NEP
- c. Tax payer's money getting wasted as on one hand states continue to provide for unsubscribed state schools, they have to additionally compensate private schools
- d. Breaking the financial viability of well performing private schools as the amount of compensation offered is negligible compared to the cost that these schools incur per student
- e. Schools becoming commercially unviable as parents of 75% fee paying students resist increase in fee to compensate for the revenue foregone for 25% RTE students
- f. Confusion and activism in absence of provision for uniforms, text books, transportation etc by the state
- g. Many states have refuted the implementation of section 12(1)c

FA strongly maintains that provision such as section 12(1)c can never be implemented well as it shall always lead to resistance and malpractice. However if the government insists for political reasons to continue the same, the same should be subject to the following:

- a. Fixing criminal liability for households declaring false incomes
- b. Fixing criminal liability against government officers issuing false certificates
- c. Fixing criminal liability on schools that inflate student numbers
- d. State should compensate the private school against every RTE student an amount equivalent to 85% of the school fee prescribed by the respective school for that grade to other fee paying students
- e. Students should be referred to private schools only if there is no vacancy in government schools in the neighbourhood
- f. Adoption of a neighbourhood government school should be provided as an alternative to 25% reservation

## **8.6 Protection of rights of the child and adolescent education**

While fully supporting protection of 'Child Rights' in every way FA wants to caution going on the other extreme, particularly in dealing with juvenile misconduct. School children are of an impressionable age where they often indulge in experimentation without realising the outcomes.

Wherever there is conglomeration of human beings, some incidents are bound to happen. No school or for that matter no home can guarantee that no untoward incident shall ever happen within its ambit.


Media overboard and misguided activism on child rights may sometimes blow matters out of proportion. This has started dissuading people to become teachers and assume administrative positions in schools. There is a huge sense of fear and uncertainty. This is not good for the system at all.

Child safety is of paramount importance. What is important and should be necessary for all schools to maintain is adherence to practical safety standards, measures and guidelines. Every child has an equal right to safety irrespective of her/his economic or social background. These safety norms should be universal and uniform for all kinds of schools, both public and private.

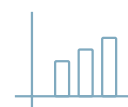
After studying various guidelines and norms rolled out by various agencies, both in centre and states and in consultation with child safety experts, FA has compiled a comprehensive manual and tool kit for schools to follow to ensure child safety. FA shall be humbled to present the same.

One very important area of child safety and development is 'mental health'. In this increasingly complex and fast pace world what the human race is lacking is the emotional quotient. It is extremely important to lay due importance to this area of child development and provide for 'Mental Health Counsellors' in every school complex.





# Additional Key Focus Areas





## Technology in Education

FA welcomes the move to introduce a specific and focused body to deal with the use of Technology in Education, however, it is imperative to equip students to effectively leverage technology for learning.

- In order to function and succeed in an environment marked by VUCA [Volatile, Uncertain, Complex & Ambiguous], the right planning and skill sets will set the right stage for student development.
- A continuous technology curriculum from KG to PG should be introduced in order to ensure proper streamlining of knowledge and steady upgrade of courseware throughout the student life.
- With United Nations recommending only 1 hour screen time per child per day, it appears that the focus on gadget and 1-to1 computing in Education is expected to slowly reduce.
- The teacher must be allowed to create her own curriculum to allow students to learn at their own pace to create a personalized learning environment. It is crucial to lay focus on Blended Learning with equal emphasis on traditional method of teaching and at the same time leveraging technology in classroom to prepare 21st century students.
- Technology is the biggest disruptor today. It democratizes availability of opportunity and acts as a great leveler. Flexibility must be granted by paving way for leveraging online instructions and submissions, 'anytime' and 'anywhere,' thereby increasing access within safe and protected cyber learning environments
- Virtual reality, Augmented reality, Blockchain, Internet of Things are technologies that are easy to get drawn into but difficult to sustain. Education that bases itself on new cutting-edge technology will need to be constantly upgraded and be required to reinvent itself every few years. Rather than focusing on end user of technology, Education must focus on the fundamentals, schools must teach core computing principles.
  - Pre Primary & Primary: Elements of coding and problem solving.
  - Middle & Senior school : Computer languages and Coding
  - College : Artificial Intelligence, Machine Learning

Since the diversity and scale of Indian Education system is so unique, working on skill sets and preparing the right mind-set of internationalism will be more critical than spending huge budgets in acquiring technology infrastructure that often lie unused and soon loses relevance due to the inherent redundancy of technology industry.

While millennials in today's classrooms are eager to embrace technology, many a times it is resisted by adults - teachers. This is due to lack of training and fear of expensive gadgets. In order to overcome the same FA recommends the following:

- a. Appoint a passionate ICT Co-ordinator in each school complex. Hire such on deputation from large IT firms. Include this as an option for mandated CSR spending;
- b. Appoint in each school from among the teachers an 'ICT Champion'. Rotate this position every two years;
- c. Create a transparent mechanism for determining if damage is done by careless neglect or wrong intention.





# Vocational Education

FA puts forth high commendation for this much needed effort to mainstream skills and education. The social stigma attached to manual jobs, parental control on the child's education and employment, lack of awareness about career paths through vocational stream or negligible importance given to entrepreneurial options – hurdles such as these need mind-set changes. While FA strongly endorses exposure and orientation to vocations in more than one sector during Grades 6-8, followed by deeper engagement for Grades 9-12, the following is highly recommended:

- Enhance skill based programs through parents seminars and principal walk through sessions
- Develop an implementation framework for vocational courses starting at Grades 9-11 aka the dual curriculum Switzerland and Germany Model
- Industry based apprenticeship programs must be encouraged, there should be a theory-practice continuum among class rooms and worksites
- Indian companies are passive beneficiaries of the Indian VET system. There is no any single system of governance in which the private companies can take either part in running the vocational education schools or investing in such ventures
- India needs to be put in place a well-coordinated institutional legal mechanism binding the stakeholders to play their respective roles effectively
- As the German Chambers do self-regulation, SSCs have to learn from them and adopt a method of regulating themselves towards the goal of preparing curriculum design, certification and standardization of syllabus, certification of skills and competencies.
- Localize content which is globally harmonized so that students do not have to migrate to metros for basic job roles
- The proposal for detailing NSQF into specifics for each of the disciplines and vocations and re-examination of all the standards for vocational education and training across all ministries, to be initiated and adopted in a time bound manner
- Credit transfers/ learning pathways to be well defined
- Showcase successful vocational entrepreneurs as role models to create aspirations

The proposal to set up National Committee for the Integration of Vocational Education (NCIVE) is a laudable move, it is imperative for the concerned ministries to jointly work towards the goal of mainstreaming skills and education and not just work in silos. There needs to be seamless coordination between them and allied bodies. FA is happy to facilitate this process.

*“ A coordinating body at the Centre and State can gather and record the initial learning from educational institutions and disseminate these widely.... the spread of knowhow regarding provision of quality vocational education”*

Aligned with the Government’s vision, FICCI recognises to improve the quality of vocational education from school itself. FA has undertaken a study to assess the various dimensions of the current state of affairs of vocational education in schools, identify gaps and put forth a roadmap for effective implementation.



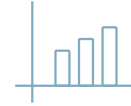


# Transforming Education





## Rashtriya Shiksha Aayog (RSA)

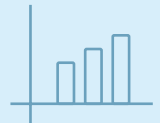


FA much hails and strongly recommends formation of NEC/RSA as proposed. FA also advocates for formation of RjSA by various states. FA would like to request to include it's nominee in the RSA as a representative of some of the most leading schools in the country.



Established in 1927, FICCI is the largest and oldest apex business organisation in India. Its history is closely interwoven with India's struggle for independence, its industrialization, and its emergence as one of the most rapidly growing global economies. A non-government, not-for-profit organisation, FICCI is the voice of India's business and industry. From influencing policy to encouraging debate, engaging with policy makers and civil society, FICCI articulates the views and concerns of industry. It serves its members from the Indian private and public corporate sectors and multinational companies, drawing its strength from diverse regional chambers of commerce and industry across states, reaching out to over 2,50,000 companies. The chamber with its presence in 14 states and 10 countries, provides a platform for networking and consensus building within and across sectors and is the first port of call for Indian industry, policy makers and the international business community.

Address: FICCI, Federation House, Tansen Marg, New Delhi-110001



FICCI Alliance for Re-Imagining School Education (FICCI ARISE) is a collegium of members representing various facets of the education ecosystem who have come together to promote the need of quality education for all and the role independent schools can play in achieving this. The primary focus of the alliance is defining norms for standards and transparency, augmenting quality for 21st century readiness, policy advocacy and facilitating Capacity Building and access. The alliance advocates for a progressive policy environment that brings together public and independent schools to achieve Universal Quality Education in India. FICCI ARISE endeavours to unify the sectors' voice at States and National level. We have a national footprint through our National Committee and five Regional Committees. Our members and affiliates are education experts and represent leading schools, industry associations, consulting firms, think tanks, and foundations.



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