AIPSN on New Education Policy 2020 (NEP2020)

1. Overview

The National Education Policy 2020 (henceforth NEP2020) document is supposedly based on the Kasturirangan Committee's Draft New Education Policy (DNEP) of 2019 and the large numbers of public responses to it. Perusal of both documents reveals many differences between them. Yet there is no summary of responses received on DNEP2019, no explanation of changes made to DNEP2019 while formulating NEP2020 and reasons for the same, nor is there any statement about the authors of NEP2020. In fact, NEP2020 is so different from DNEP2019 that NEP2020 should be treated as a Draft and fresh public consultations should be held. In any case, thorough discussions on NEP2020 are required in Parliament before proceeding further. Also, as NEP2020 is highly centralized and intrudes heavily on the rights of States on a subject which requires therefore consultation with the state legislators. Discussions in State Assemblies are essential. Unfortunately, several aspects of NEP are already being implemented by the Centre and in some States pre-empting all participatory and democratic decision-making.

In one sense, NEP2020 seems to continue along the lines of several earlier Education Policies, long on rhetoric about major reform and change, short on fund allocation and implementation. Such policies have sought to capitalize on the frustrations of students, teachers, parents and the general public with the existing system, and promise them a much better system. On the other hand, NEP2020 contains several concrete proposals which do indeed mark a significant break from the extant educational system, and which may indeed bring about major changes if implemented as stated. However, most of the changes proposed in NEP2020 will cause severe damage to quality of education, increase education costs, and sharply reduce access to education for students from SC/ST and other socially and economically underprivileged sections, at a time when there is a legal obligation on the State to ensure quality outcomes in education for the large mass of students and youth as a right of all young citizens.

NEP2020 represents a sharp retreat of the State from public education. Its main thrusts are on centralization of authority in key areas, commercialization and de-regulation of the education system, creating a basis for saffronization especially in schools, and withdrawal of Reservations and other affirmative action especially for SC/ST and other historically oppressed and deprived sections.

NEP2020 seeks to undo the right to education of good quality that poor and historically marginalized sections of society have managed to obtain after much struggle. It lays the groundwork for abandoning the justiciable Right to Education (RtE) Act for children of 6-14 years age. While NEP2020 makes tall claims about "universal access" from 3-16 years of age, making it sound like an advance over RtE, mere access is actually a step backward from the guarantee of good quality education contained in RTE read with NCF 2005. It will also be non-justiciable, since NEP2020 is not backed by any legislation. Access to education will *de facto* be restricted, especially for students from rural, tribal and remote areas, by NEP2020 proposals to close down many schools on grounds of "viability" and "efficiency."

NEP2020 uses flowery phrases and policy proposals that appeal to either privileged sections of society or to the "cultural-nationalist" stream of the ruling dispensation. Whereas several proposals of NEP2020 give an appearance of being positive changes leading to long-awaited modernization of the educational system, closer examination shows that the NEP2020 does not address the ground realities of the Indian educational system, will worsen the prevailing inequality of access for Dalits, tribals, urban and rural poor and other socially, economically and educationally deprived sections of society. If at all there are benefits of NEP, these will be obtained only by already privileged and better-off sections of society.

Shockingly, NEP2020 does not even mention Reservation even though it is enshrined in the Constitution. Everywhere only "merit" is mentioned as the basis for admissions at all levels, despite it being well known that so-called "merit" is only a reflection of privilege and benefits accruing from higher incomes and social status. It is to be noted that Tamil Nadu, for instance, has managed to attain a Gross Enrollment Ration (GER) of 49.5% primarily due to its reservation policies, along with absence of entrance examinations for UG and PG courses. In India, examinations by themselves are not a true test of ability, and relate more to exam-performance ability often acquired through resource-intensive tuitions, training institutions and orientations obtained through private schools and enabling home environments.

How can the NEP2020 goal of 50% GER be achieved without Reservation and with the National Entrance Tests for higher education that it suggests? The answer lies in the undisguised running thread of on-line education at all levels in NEP2020, which is falsely projected as equivalent to classroom teaching and learning. If a large proportion of children and youth are denied access, either because of lack of financial wherewithal or due to supposed lack of academic "merit," they will be forced into on-line education which the State will pass off as mainstream education.

The sharply increased centralization in NEP2020 will erode federalism and the rights of States. Even though Education is in the Concurrent List, under NEP2020 the States will only be allowed to implement Centrally-imposed policies under supervision of Central agencies for examinations, admissions, standards, funding and assessment, and with centrally imposed text books. NEP2020 leaves almost no scope for State-level shaping of Education which is essential in India because of its cultural, social and linguistic diversity. This makes it even more necessary that deliberations be held in State Assemblies, positions be taken by State Governments, and public opinion be mobilized in States to put forward State-level perspectives on education and the NEP2020 proposals.

NEP2020 provides an open playing field at the pre-school, school and college/university levels for corporate and private interests, while making token statements about preventing commercialization of education. The NEP2020 schema of "light but tight regulation," essentially means free rein to private schools and "light" or no regulation over higher-education curricula, fees, admissions and conditions of work of Faculty, along with supposedly "tight" control over university admissions tests, accreditation, and some very broad outcome standards.

Teachers will be severely impacted by NEP2020 proposals for dilution of teacher training at the school level, for extending probation period in higher education institutions (HEI), and for linking tenure of service and other conditions of service to subjective assessments by autonomous and unregulated HEI managements.

Many NEP2020 proposals will require substantial increase in public expenditure on education which goes against the observed withdrawal of the State from this sector. While NEP2020 talks of raising public investment in education to 6% of GDP, so did the Kothari Commission Report way back in 1966 with implementation falling far short. From subsequent comments by the Minister for HRD, government is likely to include both expenditures by States and by the private sector in estimation of investments in education. Regrettably, even the more meaningful suggested increase in annual budgetary expenditure on education proposed in DNEP2019 has been dropped in NEP2020.

All in all, while creating a few expanded opportunities for better-off sections of society, NEP2020 undermines existing rights of the majority and fails to meet the aspirations of economically and socially disadvantaged children and youth in India for all-round knowledge and gainful employment in the modern globally-integrated economy that is both knowledge- and skill-intensive.

Major proposals of NEP2020 for different stages of education are discussed below.

2. Early Childhood Care, Development & Education (ECCE)

NEP2020 represents a reversal of a positive aspect of NEP2019 which had specifically proposed to amend and extend the RTE Act to cover the age group 3-6. This welcome proposal in NEP2019 to amend the RTE Act is replaced by only a recommendation to provide for pre-school early childhood care and preparation for entry into the education system for children in the 3-6 years age-group. This is internationally encouraged including by UNESCO and in many developed and middle-income developing countries is provided within the government-run school system. In India, there has been a mushrooming of the private pre-school education business in recent years, which idea is now being given policy recognition. However, most experts have questioned whether the emphasis in NEP2020 on literacy and numeracy during ECCE, essentially extending school earning to younger pre-primary ages, is pedagogically and developmentally correct.

In any case, NEP2020 proposes to primarily use the existing Anganwadi system, which is already providing early childhood mother-and-child care and nutrition, and would also utilize local primary schools. Sensitive handling of children in the 3-6 years age-group and providing pre-school exposure to education requires specialized training and NEP2020 proposes to provide on-line training to Anganwadi workers including periodic contact classes in local schools.

However, several questions remain unanswered in NEP2020 regarding ECCE. Will Anganwadi workers be provided additional remuneration and due recognition through appropriate re-designation giving due recognition to their new and more specialized roles? Will local panchayats be provided the additional funds required for additional space and facilities needed such as play and activity areas, and educational materials etc? Where will additional funding come from for providing good sanitation, clean drinking water, and additional nutritional food for the children in these upgraded facilities?

3. School Education

A basic and fundamental flaw in NEP2019 is its attempt to replace the right to good quality outcomes guaranteed by the RTE Act read with NCF 2005, by mere access to quality education. This will take Indian school education back by 50 years.

There has been much discussion in the country over the past several years about the school system overburdening children with huge curricular load, textbook-based rote learning and examination pressure. Internationally the trend is towards more open learning, teaching and testing methods emphasizing critical thinking and problem-solving. NEP2020 pays lip service to these issues in speaking of more open and flexible teaching-learning.

Yet, going against this entire trend and its own rhetoric, NEP2020 introduces public national-level examinations after Grades 3, 5 and 8, apart from the existing exams after Grades 10 and 12. Although this is supposedly for the purpose of assessing schools and monitor progress, it will undoubtedly increase pressure on students and re-emphasize rote learning. There is even talk of semester-wise, course-wise and other periodic exams, again at the national level. This "exam raj" runs counter to all global trends, and not only adds to the burden and pressure on children, it further exaggerate the importance of exam performance as a means to assess learning outcomes.

A new centralized all-India University entrance exam is also proposed under a new National Assessment Centre. This not only introduces yet another exam, it also undermines the role of State Boards and even of the CBSE, and once again emphasizes exam performance which will further encourage coaching establishments.

The trend of centralization is also reflected in NEP2020's call for National Textbooks, supposedly with "local content and flavor," instead of adopting a National Curriculum Framework and allowing States to develop their own textbook content. Experts assert that the learning process is most effective when education is rooted in a familiar physical, social and cultural environment. This is especially true in a culturally diverse country like India, and precisely this diversity is sought to be buried under centralized curricula and textbooks. Further, as we know, this centralization can also

lead to arbitrary and motivated actions as witnessed recently during the Covid19 pandemic when subjects/chapters related to secularism, critical thinking and certain historical/political figures were removed from the syllabus under cover of reducing load imposed by Covid-related lockdowns and restrictions.

The centralization assumes more sinister dimensions in the clearly displayed desire to push a saffronization agenda through the Sangh Parivar perspective of Indian society and culture in curricula and in schools in general. Despite talking about promoting constitutional values in school education, the word "secularism" does not occur even once in NEP2020. While speaking of promoting critical thinking and scientific temper, NEP2020 says "Indian Knowledge Systems" would be taught, without explaining what this term means. For instance, will it mean propagating the idea that ancient India had aerospace technologies including inter-planetary travel, or that internet was prevalent during the Mahabharata war, or that various mythologies "prove" knowledge of advanced plastic surgery and in-vitro fertilization etc, as propagated by leading lights of the present ruling dispensation?

At the same time, NEP2020 only makes passing references to tribal and indigenous knowledge, showing what the present government considers "mainstream" or "marginal" knowledge traditions. Additionally, in language education in Grades 6-8, NEP2020 takes forward the Hindutva idea of "one nation, one language" by emphasizing the "remarkable unity of most... major Indian languages, [and] their common... origins... from Sanskrit," completely downplaying the independent ancient, historical and continuing Dravidian and different Adivasi and other language groups in the North-East. NEP2020 also speaks of India's classical and other Indian languages having rich literature and culture, and mention is made of Pali, Prakrit and even the obviously foreign Persian, but does not at all mention Urdu, a quintessentially Indian language and a great example of the syncretic culture of the Indian civilization!

There are many other problematic proposals in NEP2020.

A large number of government schools, especially those in small or isolated communities, are to be shut down in the name of efficiency, viability and resource optimization. While such a process is already under way, NEP2020 now gives this process *de jure* status. Many teachers would lose jobs, and children would have to travel over greater distances under difficult circumstances, further reducing access to education and prompting additional drop-outs.

NEP2020 proposes a three language formula, where Sanskrit could be exercised as an option apart from the mother tongue or local language, and has already met with opposition by Tamil Nadu, exposing the lack of consultations with State Governments.

Most unfortunately, NEP2020 effectively suggests withdrawal of the State from its commitment to *provide* education of good quality to the 6-14 years age groups *as a justiciable right* under RTE 2009, and replaces it with a vague assurance to "ensure universal access to education at all levels from age 3 to 18". So as to evade the responsibility of the State to ensure enrolment and retention of dropouts in the public education system, NEP2020 recommends "alternative and innovative education centres... in cooperation with civil society" for children of migrant workers and other drop-outs. Similarly, there is a proposal that Socio-economically Disadvantaged Groups (SEDG) (including differently-abled children), a new grab-all term which eliminates recognition of the unique historical discrimination against SC and ST communities, could be taught mainly through National and State Institutes of Open Schools (NIOS/SIOS), increasing their deprivation and widening the digital divide, instead of having reservations and special arrangements within the public education system. After this NEP2020-recommended system comes into effect, Government can in future wash away any responsibility for low enrolment and high drop-out rates, and can shift responsibility on poor performance by NGOs or failure of children to utilize on-line or other distance learning facilities.

Importantly, the entire NEP2020 approach of withdrawal from public education runs counter to the trend in most developed and middle-income developing countries. NEP2020 does not contain

any significant policy directions or promises to strengthen and expand public education, meaning that India can expect continued expansion of the private school system which only widens social and economic disparities, and perpetuates privilege.

Previous Education Commissions and Education Policies had called for a strong publicly-funded Common School System based on Neighbourhood Schools, although implementation never delivered. NEP2020 has now completely abandoned this basic and important idea for a deeply unequal society as prevails in India. RtE gave the right to good quality education from 6-14 years, but NEP2020 does not give any right, of good quality education, not only for the above age group but also for the 3-6 yrs age group or for 14-18 yr-olds.

4. Teacher Education

The well-known shortage of qualified and trained teachers, especially in the public education system and, within that, in tribal and remote areas, is acknowledged in NEP2020 but inadequately addressed. NEP2020 demonstrates a lack of interest by the Government in genuine expansion and strengthening the public education system, especially the number of teachers and other resources. Instead, NEP2020 suggests a highly impractical concept of school complexes, clubbing together schools within 10km radius and sharing of teachers.

The running thread of centralization and "Exam Raj" again comes to the fore in the NEP2020 proposal for a national Teacher Eligibility Test (TET), which is to be extended to all levels of education from foundation to secondary. This calls into question the quality of teacher training and the relevant degrees awarded by Universities.

The specialized skills required for teaching are devalued by the NEP2020 scheme under which Teachers all the way from Grade-1 right up to Grade -12 will go through the same 4-year integrated BEd degrees with one subject specialization. The existing system addresses the specific teaching requirements for each school stage, such as the BElEd programme for elementary school teachers. The NEP2020 scheme also introduces a 2-year BEd for Graduates and a 1-year BEd for post-grads, again underestimating the special training required to become teachers, and instead assumes that graduate or post-grad degree with brief training on teaching as such would be adequate. NEP2020 also introduces short-term courses of 2 weeks to 3 months for any person with or without adequate qualifications. These provisions will create under-qualified teachers adversely impacting quality of education, and will open the doors for commercialization of teacher training.

5. Vocational Education

Vocational Education (VocEd) in India has historically been badly managed and understood. Till now, India has oscillated between entry-level vocational skills at the +2 stage in high school, and a weak system of ITIs in a few (now outdated) trades. In India's caste- and class-ridden society stretching back thousands of years, the middle classes/upper castes received education while lower classes/castes received skills-training passed down from earlier generations. This casteist framework persists to this day, where a virtual 'firewall' persists between the education system and the skills system, ill-suited to a modern industrial economy where the work force requires not only advanced skills but also higher levels of knowledge in related areas. Only around 2% of the labour force in India has had any formal training whatsoever, compared to around 50% in China, 55% in the US, 80-85% in the EU and S.Korea, and over 90% in Japan. International experience, in both advanced industrial economies and middle-income developing economies as in South-East Asia, is that Vocational Education (VocEd) is part of tertiary education after school *for young adults*, after either completion of a full secondary education or achievement of some minimum levels there, with attainment of higher education levels along with skills training at the tertiary level.

There was some recognition of this in DNEP2019 which had correctly proposed a major shift in VocEd and had placed it in Higher Education Institutions, although there were several problems in the modalities suggested in DNEP2019 which had been highlighted in AIPSN's response. However, this is rolled back in NEP2020 where VocEd is once again dragged back to the school system.

NEP2020 states that VocEd would be fully "integrated with the educational offerings of all secondary schools in a phased manner" and further, that towards this end, "secondary schools will collaborate with ITIs, polytechnics, local industry etc (NEP2020 Para 16.5)." DNEP2019 had proposed that such collaboration would more appropriately take place between HEIs and ITIs etc. Going further to even earlier stages of schooling, NEP2020 speaks of VocEd courses in Gr.6-8 including internships with artisans! These are all unwelcome backward steps for several reasons.

Encouraging adoption of VocEd in secondary school, takes away considerable time from the educational curriculum, and prevents children from obtaining a complete and well-rounded secondary education, considered by most modern nations to be essential not only for a competent work force but also for empowered citizens. The step can encourage drop-outs by making children think they are prepared for entry into the job market. However, skills and accompanying educational levels obtained in Gr.8-12 as proposed under NEP2020 can only be low- and entry-level qualifications, inadequate for most real-life industrial or service-sector jobs except at the lowest rung. All international Skill Qualification Frameworks (SQF) such as in the UK, EU, Australia etc, including at least on paper the NSQF to be adopted in India along those lines, place vocational skills along with +2 level educational qualifications at the lowest Level 1 or at best Level 2 with some post-school certificates or diplomas, all higher level SQF rankings requiring tertiary education and corresponding better and more sophisticated skills. Placing Gr.6-8 students in artisanal internships can encourage children to follow hereditary caste-linked occupations, and even secondary school VocEd will only enable semi-skilled or low-skilled vocations, going in the opposite direction to demands of an increasingly knowledge-based and higher-skilled economy.

The NEP2020 proposal to place VocEd in secondary schools also puts a burden on the already stressed school system with additional responsibilities, need for new teachers with adequate skills, experience and qualifications and, above all, expensive infrastructure in equipment/machinery for different trades/vocations. Schools are struggling even to have the most basic facilities such as science laboratories, and to expect them to be equipped enough to provide skill-training in a wide range of vocations is a pipe-dream. In the absence of skilled and qualified instructors and requisite equipment, most schools will end up providing low-level skills in a limited range of vocations, such as for instance carpentry or tailoring. As proposed, the entire schema is doomed to fail due both to practical unfeasibility and inability to meet stated goals.

It needs emphasis that we fully support and encourage introduction of co-curricular activities in different arts, crafts, trades and services, at least from Gr.9 onwards and even during Gr.6-8 if feasible subject to availability of facilities, in which all students participate. These courses would provide orientation and entry-level skills enabling students to gain insights into different vocations and assess their own interest and talent in different spheres which they may, or may not, pursue further after school towards a career. However, these courses in school should not be considered directly linked to jobs, and therefore the term "Vocational Education" is wholly inappropriate in school.

Finally, it needs to be noted that, contrary to the intensive discussions taking place in the industrial and corporate systems regarding the paucity of skills and related education in the work force in India, the NEP2020 proposals on VocEd have been placed in a vacuum, with no connection to industrial, employment and human resource planning, as is necessary, and as attempted in DNEP2019. It is also divorced from the National Skills Development Mission, which is proceeding completely independently, with little or no linkage with the educational system. Therefore NEP2020 and the government policy framework within which it is situated, completely fails to address the

needs of Indian industry and economy, and will not meet the aspirations of India's youth with regard to the knowledge- and skill-intensive economy of the future.

6. Higher Education (HE)

Indian higher education after 1990 has already gone far down the path of privatization, with mushrooming of private higher education institutions (HEI) especially in professional courses like engineering, management and medicine. As much as 72.5% of undergraduate and around 60% of post-graduate enrolment in HEI is in private unaided institutions. Many of these have poor facilities and faculty, especially in technical subjects, but charge unregulated high fees and various under-the-table payments. However, they are still unable to ensure well-qualified and trained graduates. Public HEI still dominate in University enrolment, but even here the situation is changing rapidly due to the inroads made by self financing courses and autonomous colleges. In the past 5 years, 55 per cent of the total increase in university enrolment was in private universities and another 33 per cent in public open universities, not regular Central and State Universities where enrolment has stagnated or declined.

Public universities are meanwhile starved of funds for teaching, with almost no support for research, and are compelled to raise fees or otherwise commercialize. In keeping with overall trends, even many public HEI, especially in professional courses, have witnessed a significant increase in fees. All this reflects low and decreasing public investment in higher education, with consequent increase in privatization and commercialization, higher costs and reduced access for students from lower-income households, and lower quality of higher education in an unregulated environment.

There is certainly considerable need for reform in higher education from the point of view of both students and employers. Frustration arising from the current unsatisfactory situation often prompts demands for change and a tendency to accept promises of improvement. This has also been witnessed in public response to earlier new education policies which have proposed major even radical reforms, only to later completely fail to deliver on any of them.

NEP2020 similarly is full of lofty phrases, flowery language and appeals to aspirational sentiments of students. However, the concrete proposals actually do not offer socially desirable and practically feasible solutions to the fundamental problems outlined above. Some are completely impracticable and are therefore likely to fall by the wayside, and many proposals are such as to exacerbate privatization and commercialization, raise costs, and reduce access to socially and economically deprived sections, while negatively impacting quality with the possible exception of a few elite and expensive institutions which will be out of reach of the vast majority of students. Some of the major proposals of NEP2020 are examined below.

NEP2020 makes the highly disruptive proposal to completely do away with affiliated colleges and move towards large, multi-disciplinary campus-based Universities or HEIs which would offer courses across all disciplines and categories, with a selected set of colleges becoming Autonomous Colleges with powers to grant degrees. All the multi-disciplinary HEIs will offer 4-year undergraduate courses with entry and exit points after each year with Certificates, Diplomas, Advanced Diplomas and Degrees. It is necessary to understand the significance of these proposals and their impact on quality, cost and access to education.

Large multi-disciplinary campus-based universities offering courses across all disciplines would of course be welcome, wherever feasible in terms of space, infrastructure and facilities. However, many existing universities will not have the land, buildings or funds to expand their campuses as called for in NEP2020, and may also be unduly diluting their specialized capabilities. Meanwhile, the NEP2020 proposal would also lead to large-scale closure of affiliated colleges, severely impacting access to higher education of rural, SC/ST and socio-economically deprived sections.

The NEP2020 also proposes that even existing specialist professional institutions, such as IITs would be required to include humanities and social sciences courses in their offerings and become fully multi-disciplinary. There can be no objection in principle, and most IITs for example already offer such courses. However, there are limits to such expansion, and many practical limitations should be respected, especially so that specialized capabilities are not lost or unduly diluted. For instance, it would make no sense to insist that specialist medical institutions like AIIMS or PGIMR, IIMs, National Law School Universities, are compelled to offer a wide range of courses in the sciences, engineering or humanities. It should also be noted that specialized technical universities such as MIT or Caltech in the US, whose model is clearly sought to be replicated in India by NEP2020, retain their core technical specializations while offering some humanities courses, somewhat like the IITs, albeit on a much larger scale. MIT and Caltech have 5-6 Schools in technical disciplines and 1 School for all humanities and social science disciplines, but no law or and programmes. NEP2020's proposal business schools Universities/Institutions to transform into multi-disciplinary campuses in this regard will either collapse under its own contradictions or will simply not take off except in a few cases where there are large corporate profiteering interests.

NEP2020's proposal for 4-year undergraduate degrees with entry and exit points after each year with different Certificate/Diploma qualifications defeats the intention to expand higher education. The proposal provides for multiple entry and exit points. The purpose of providing different points of lateral entry and exit, as provided for in HEI in other countries, is to enable lateral transitions between industry and education, providing opportunities for life-long education to people to upgrade their qualifications as desired at different point of their careers. This requires separately designed Certificate or Diploma Courses representing different levels of the SQF. This is very different from finishing, say, the first year of a 4-year course for a Certificate or two years of the 4-year course for a Diploma. Such a schema will not enable obtaining the requisite upgraded qualification for mid-career learners, and on the other hand will destroy the integrity of the 4-year Bachelor's degree.

Some of the affiliating Colleges would be granted autonomy based on their grading in a ranking system and declared as Autonomous Colleges empowered to grant their own degrees. Experience with Autonomous Colleges so far, for instance in Delhi, has shown that it only means privatization of such Colleges, de-regulation as regards higher fees and poor working conditions for teachers, and the freedom to offer tailor-made short-term courses, all for further commercialization of higher education.

Indeed, the NEP2020's intent of commercialization of education is clearly reflected in the corporate structures suggested for HEIs. Each HEI is to independently form its own Board of Governors (BoG) which would then take full control over all affairs of the University/HEI. Teachers are likely to be major victims of the NEP2020's corporate-style governance of HEIs, since Teachers' pay, type, tenure of employment, promotions etc will all be decided internally by each HEI BoG with no uniform standards or norms prescribed by government. Performance assessment would also be subjective and free from any oversight or regulation.

Within this neo-liberal landscape of privatized and corporatized HEIs, foreign universities are proposed to be invited to operate in India. Since they are being invited as "centres of excellence," they would implicitly set a standard or act as role models for Indian universities to follow, including corporate styles of governance, market-oriented course structures, casual or contract employment of teachers, and high fees.

A centralized National Research Fund (NRF) is proposed to be set up in addition to the many agencies that already provide research funding. Only NRF will provide public funds for research to both public and private Universities.

Again, as in other neo-liberal corporate sectors of the economy, there is no space at all in NEP2020 for democratized governance of HEI. Teachers and Students have no role to play in Universities, other than as "consumers".

The heavy hand of the Central Government is visible in the NEP2020 proposal to constitute multiple Central Institutions such as a Higher Education Council (HECI) at the apex accompanied by NHERC for regulation, NAC for accreditation, HEGC for grants, and GEC to frame outcome standards. Assessments of outcomes would also be done centrally, which may well determine ratings, accreditation and funding. While there is much talk of educators and persons of eminence being selected for these institutions, given experience with the present ruling dispensation in different sectors, the dominant role of the political executive is obviously to be expected.

A national examination for entrance to HEIs will also be conducted by a Central Agency, even though the value of this exam is open to question since, according to NEP2020, "It will be left up to individual universities and colleges to use NTA assessments for their admissions (NEP2020 Para 4.42)". The relevance of Central and State Boards, and exams conducted by them are also therefore open to question. How State Universities and other State-level HEIs are expected to function is not separately addressed by NEP2020, clearly implying that all HEIs in the country will be governed by these Central agencies operating under the Central Government.

7. Adult Education and Life long Learning

The whole concept of Adult Education is diluted as regards both purpose and delivery. Firstly, there is no focus on basic literacy, and life-long education is treated in a very casual manner. Secondly, focus is again on on-line transactions through digital primers and supplementary books.

Even earlier there was a shift away from the mass campaign approach pioneered by AIPSN/BGVS to a convergence-based approach during earlier Saakshar Bharat programme, bringing together different government schemes to facilitate adult education. Now, despite acknowledging that the mass campaign approach had yielded substantial dividends, NEP2020 goes back to outdated concepts of the 1980s emphasizing school-based approaches, "each one, teach one," or by involving student volunteers for basic literacy and dependence on linkages with other programmes for life-long learning. These activities are supposed to take place in school buildings after teaching hours, which again will limit access to basic literacy and life-long education

There is also a systematic dismantling of the 4-decades old academic and professional institutions like Department of Adult Education (DAE) and State Education Resource Centres (SERCs) by locating resource support in NCERT and SCERTs, which have academic and technical capabilities for formal education rather than non-formal education, thus losing institutional memories and decades long proven experience of alternative approaches.