

***51 REASONS WHY NEP 2020
MUST BE OPPOSED***

¹Initial document of 42-Points (30/09/2020) named, ‘Critical Issues in the Sugar-Coated Poisonous Pill of NEP 2020’ evolved into 51-Points, constituting the template for developing AIFRTE’s present Comprehensive Critique of NEP 2020.

1. The implementation of the NEP 2020 is grossly undemocratic as it does not have the approval of the Parliament.
2. NEP 2020 is anti-constitutional as it overrides the rights of state governments for taking important decisions about education which is a subject in the Concurrent List of the Indian Constitution where usually, state governments should decide. It denies state governments their constitutionally provided federal power to take necessary academic and pedagogic decisions by imposing centralized regulatory bodies, centralized eligibility and evaluation tests and even centrally coordinated tests at classes 3, 5, and 8 in schools.
3. NEP 2020 uncritically mimics the long-discarded idea of the 'ancient golden age' propagated by the colonial Indologists ignoring caste and gender discrimination. It entirely ignores the non-Brahmanical rich contribution to knowledge and pedagogy of debate led by Gautam Buddha and Mahavira as well as by the philosophical work of Charvak in the ancient period and by the Sufi-Bhakti, Islamic and Sikh traditions during the medieval period.
4. It is anti-constitutional because it violates the fundamental right to equality, an obligation of the state, by making substandard educational provisions such as School Complexes, single teacher schools, home-based education, two-level of courses and exams, one-way digital education through E-vidya Programme, and open schooling, etc, for 85% to 90% of our population belonging to the disadvantaged category.
5. NEP 2020 ignores, through the ill-conceived notion of so-called 'Merit', the Constitutional provision for reservation in admissions, recruitment and promotions

and other duly legislated provisions of Social Justice, such as scholarships, fellowships, hostels, subsidies etc.

6. Again, 'merit' is understood not as qualifications and eligibility conditions of teachers but as "commitment to the institution and society and showing leadership qualities", leaving scope to promote 'politically committed' persons to higher posts in governance and control of educational institutions.
7. NEP 2020 makes no mention of the constitutional provision of reservation for ensuring social justice to the discriminated SC/ST/OBC/PWDs and other disadvantaged sections.
8. It deliberately excludes the words secularism and socialism which constitute the legacy of the Freedom Struggle.
9. It nowhere mentions the Constitutional mandate of "free and compulsory education" for all children or even for the disadvantaged sections.
10. NEP 2020 will push 85% to 90% of our children and youth out of full-time formal education of equitable quality, relegate them to substandard and retrogressive education and push them towards lowly paid child labour or family occupations which are most likely to reinforce caste status.
11. It actually reduces the scope of mother tongues as the medium of Education: while the RTE Act provided for mother tongues as a medium of education up to grade VIII, the NEP 2020 reduces it to grade V only; and like the former act, this document also applies similar provisions like 'except wherever not possible' making the whole provision ineffectual.
12. It augments the processes of homogenization and centralization which are essentially antithetical to the survival and progress of mother tongues, regional and local languages, and diversity of knowledge.

13. Whereas NEP 2020 speaks nowhere about Urdu, despite it being listed in the VIII Schedule of the Constitution, it seeks to impose Sanskrit, almost like an obsession, at every level of education, including Higher Education.
14. It does not provide for Pre-Primary Education and Secondary Education as a fundamental right.
15. NEP 2020 will also lead to massive exclusion of the disadvantaged masses (or *Bahujans*) from education because it further dilutes the ‘no-detention policy’ of the RTE Act by instituting conventional examinations externally co-ordinated by PARAKH from Class III onwards.
16. It promotes the commercialization of education in the name of promoting philanthropic institutions without establishing any effective mechanism for distinguishing between the two. It promotes self-financing courses, slashing of grants, and increasingly replacing scholarships with student loans.
17. It completely deregulates fee and salary structures of educational institutions if they merely fulfill the requirement of online transparent self-disclosure i.e. *‘Loot and Exploit but Declare’!*
18. It dismantles public universities through the concept of graded autonomy linked with National Accreditation System.
19. It surrenders universities to the management of an “independent” ‘Board of Governors’, to be appointed centrally. These Boards will replace the Academic and Executive Councils, presently the fountainhead of democratic functioning of the Universities.
20. By linking grants to educational institutions with NAC and output measurement approach, it ensures that only some better performing (elite) institutions will get better funding and majority of already poorly funded institutions will be phased out.

21. It reintroduces four years undergraduate degree program which the BJP itself had earlier scratched in Delhi University following the concerted struggles of students and teachers.
22. Post-Graduation programme will be reduced in NEP 2020 to one year and MPhil program will be scrapped altogether. This policy provision will substantially reduce the research base of the students. It will also cause workload fluctuation for the teachers in the university departments.
23. It seeks to legitimize dropouts, more correctly termed pushed-outs, through multiple exit points. It will be particularly difficult for economically weaker sections and women to come back and resume their degree programmes.
24. NEP 2020 is sharply critical of the present regulatory system for being too heavy-handed but ironically, what it provides in its place, through the over-arching Higher Education Commission of India (HECI) and its four verticals viz., National Higher Education Regulatory Council (NHERC), National Accreditation Council (NAC), Higher Education Grants Council (HEGC) and finally the General Education Council (GEC), far surpasses the current level of centralization of control over Higher Education – financially, conceptually as well as in terms of governance.
25. It seeks to control research centrally through the proposed National Research Foundation, thereby undedrmining the spirit of spontaneity, creativity and excitement of research.
26. NEP 2020 proposes to conduct a single entrance examination centrally for all university and college admissions as well as those of the professional institutions in the country through the centralized National Testing Agency (NTA), ignoring the wide-

spread inequalities and disparities as well as diversities in the school systems of different States/UTs, thereby undermining the federal role of the States/UTs guaranteed under Article 246 (Seventh Schedule) of the Constitution. Besides, both PARAKH and NTA together will promote not only the coaching business and outsourcing of assessment/evaluation but also the linking of testing in India's education system with that of global agencies like PISA, to the detriment of the children from the oppressed castes and classes, particularly girls from these sections of society.

27. Online courses are being introduced at all levels of education as a parallel and at times as alternative to regular education, even though these won't be available to the vast majority of the *Bahujan* children.
28. All scholarships will be centralized in order to be made available from a single window across the country, strictly on the basis of merit and for fewer students, which means that scholarships based on social deprivation will be stopped and the total number of scholarships decreased.
29. Foreign Universities are being allowed to conduct their business in India and invest their surplus, through the profit derived from here, in opening more and more institutions anywhere in the world. This will add another layer in an already stratified system of higher education; promote transfer of talent from public universities to foreign universities and put students and parents under tremendous financial debt through educational loans.
30. It denies time-bound permanent appointments against all vacancies of teachers as per the 200-point roster.
31. It does not address the issue of the absorption of contractual and para-teachers in a justified and time-bound manner.

32. It does not provide for appropriate in-service training and grant of full status of Pre-Primary teacher to Anganwadi/ECCE workers.
33. It does not resolve pending problems in availing overdue promotions to permanent teachers, pension for teachers who joined after 2003 and health facilities and maternity leave for contractual and ad-hoc teachers.
34. It will require all teachers of government schools to serve within an entire School Complex which could include remotely located areas within a radius of 5 KMs to 10 KMs, even across difficult terrains.
35. Through its proposal of School Complexes and the idea of pairing of each government school with a private school, the NEP 2020 provides for dilution of the pupil-teacher ratio and undermines the concept of neighbourhood government schools, thereby paving the way for their closure/merger.
36. It allows employers to increase employees' probation period, thereby allowing for exploitation of teachers.
37. It introduces a tenure track system to promote contractualization.
38. Seniority or experience will no longer be a criterion in promotions.
39. It abolishes the criteria of reservation/social justice in promotions.
40. It de-regulates the salary structure of private school teachers which, given the pairing/twinning of government and private schools at all levels, will also impact salary structure of government school teachers.
41. NEP 2020 provides for large-scale recruitment of 'volunteers', 'social workers', 'counselors', 'local eminent persons', 'school alumni', 'active and healthy senior citizens' and 'public-spirited' community members at various stages of school education, from ECCE onwards for informal undefined roles, thereby

enabling ‘cadres’ to be recruited through the backdoor for promoting the ideological agenda of the ruling party in power in education.

42. Further, there is no room for associations of teachers for collective bargaining and nor are students unions permitted.
43. The centralization of power is being undertaken in order to provide Single Window Clearance as per WTO-GATS dictates for expediting corporatization and globalization in education as well as to advance religious fundamentalism and serve the anti-Constitution and anti-national Hindu Rashtra agenda embedded in the Brahmanical, Casteist and Patriarchal hegemony.
44. The use of home language/mother tongue/local language/regional language as synonyms is dangerous. How can regional language or the state language be allowed to replace the mother tongue of the child, even if the number of people speaking that mother tongue is rather few?
45. The policy document chooses not to explain the ‘three-language formula’, despite the ‘formula’ being a highly contested and resisted concept and having undergone several interpretations since its inception in 1960s.
46. The much-acclaimed Early Childhood Care and Education (ECCE) programme of NEP 2020 for the 3-6 year age group children has a hidden agenda i.e. opening and promoting a huge untapped market of pre-primary education, from play school/nursery onwards.
47. Even more importantly, ECCE henceforth would be integrated into the first two years of the Primary/Elementary Schools i.e. with Class I-II, without any assurance of public funds for upgrading the government schools.

48. NEP 2020 is the first policy document which allows that private institutions can accumulate surplus or profit; and that they can withdraw it out of the institution and invest it anywhere else within the ‘education sector’, even shift it to foreign countries.
49. Through ‘output measurement approach’ instead of the long-established ‘input-based approach’, NEP 2020 legitimizes both the RSS-run Ekal Vidyalayas (Single Teacher Schools) in tribal areas and also the Budget Primary Schools mushrooming in urban areas, run without trained and sufficient number of teachers, and required infrastructure.
50. Instead of acknowledging the Tapas Mazumdar Committee’s (2005) suggestion to make available educational expenditure only from the government sources, without including any contributions from the private sector, community, students or parents, NEP 2020 calls for not only the so-called ‘private philanthropic’ activity but also Foreign Direct Investment (FDI) in the education sector.
51. By encouraging privatization in a big way, the NEP 2020 is implicitly trying to proclaim that there is a lack of resources. This myth has been propagated since Macaulay’s Minutes of 1835, primarily by the upper classes and castes to maintain their hegemony over knowledge, employment and upward social mobility. Allocating adequate resources to education, health, and other social development sectors is not at all a question of lack of resources but a question of political priority.