



www.kpsta.in

KPSTA

Kerala Pradesh School Teachers' Association

Central Committee Office : KPSTA Adyapaka Bhavan,
Chinmaya School Lane, Kunnumpuram, Thiruvananthapuram. Ph : 0471 2575797
Recognised as per G.O. (MS) 289/63 Dt.29/4/1963 & GO (RT) 2317/2016 Gen.Edn. Dt.15/7/2016
&GO(RT)533/2018Gen.Edn. Dt.02/02/2018

President

V.K AJITHKUMAR

Mob : 9846154858

ajithkpsta@gmail.com

General Secretary

M. SALAHUDEEN

Mob : 9447041019

salahudeenkpsta@gmail.com

Treasurer

S. SANTHOSHKUMAR

Mob : 9447721104

santhoshkonni@gmail.com

Date.....

New Education Policy 2019 - KPSTA Suggestions

First of all KPSTA take this opportunity to acknowledge the voluminous new National Education Policy draft of 484-page in four parts; dealing with 'School Education, 'Higher Education.' 'Additional Key Focus Areas,' and Transforming Education* with an addendum, and 14 appendices. It is animated by a vision to create an India-centered* education system that will lead to the creation of an equitable and vibrant knowledge society. We would also like to congratulate some very positive steps proposed in the New Education Policy 2019 as under

1. The Draft National Education Policy 2019 is focused on Access, Equity, Quality, Affordability, and Accountability of the education system of the country. Starting with the early years and school education, the policy talks about a major overhaul in the curriculum of the early Childhood Care and Education or ECCE which concerns the pre-schoolers.
2. NEP suggests the extension of the Right to Education or RTE to cover all children from 3 to 18 years of age. At present it covers students till the age of 14 years.
3. Greater focus on continuous professional development of teachers and providing a career path to teachers for improvement of the quality of the education. The policy has proposed multiple multidisciplinary programs for teachers which would be included into large universities.
4. Proposal of a four-year integrated stage-specific B.Ed, programme has also been presented. This has already been proposed by the HRD Ministry.

5. When possible, the medium of instruction - at least until Grade 5 but preferably till at least Grade 8 will be the home language/mother tongue/local language.
6. Ensuring participation of transgender children in school education.
7. Creation of National Research Foundation for world class research.
8. Provision of breakfast in schools and strengthening quality of the midday meal
9. Formation of SMCs in all schools, which will promote community engagement in education process.
10. Teachers will not be allowed any longer to conduct government work that is not directly related to teaching (except for rare events that do not interfere with their class work).

While we welcome these initiatives we would also like to place our observations and reservations on some points and processes as the production of the draft report did not follow democratic and inclusive processes and therefore is not representative of the concerns of the majority of people/regions of India, particularly the teachers community.

1. The recommendations of the draft report have serious implications for Federalism (autonomy and rights of states) and concurrent status of education,
2. The draft report recommends major restructuring of the educational system and its governance with an overarching centralized superstructure such as the Rashtrtya Shiksha Ayog (RSA) which will have serious negative implications for the Constitutional foundations of our nation.
3. The draft report by privileging privatization and commercialization of education fails to address issues of equitable education and further deepening of democracy by adhering to core values and principles of the constitution and common school system.
4. Free and compulsory education cannot happen with the tons of exits from the school; as it said when it *V* approved for child labour for children younger than 14 years in family businesses. Major reasons for dropping out of school include expensive education, migration; push in child labour, menstruation, marriage and lack of interest' in children to study ie. lack of motivation to study. By removing the 'exits' as a normal way-out and making education a compulsory venture for all the children below 18.
5. By not making frivolous guidelines such as digitalization of open schools for CWSN and 'migratory' children, when the majority of migratory children belong to informal labourers.

Let alone affording digital aid, they do not have the access to provide basic education to their children. How are these children, without any aid, supposed to study from 'digital open schools' on computers?

6. One of the most prominent issues that the policy has addressed but not covered properly is the quality of education taught in schools. With elaborate plans of inculcating new teachers and plating them through Continuous Development Program (CDP), the older teachers and their capacity building (the majority of implementers of the new courses) are not given adequate attention.
7. Another focused point was the use of technology in the teaching process, but nothing has been clearly said about how digitalization of classrooms can take place. Subsequently, there is no discussion on how to make sports and other physical activities (such as dance, karate and yoga) a significant part of the academics. Such activities are essential for the inculcation of a lot of life skills: physical fitness, teamwork, increasing concentration, strategy building, healthy competitive skills, confidence, perseverance, hard work and strengths (both physical and mental).

We are putting our chapter wise comments as under.

Chapter 1: Early Childhood Care and Education; The Foundation of learning

1. The policy provides four modalities of providing ECE till age six. It is not clear on what basis would specific modality would be adopted.
2. This will be dilution of entire provision of RPWD Act as well as RIE Act 2009.

Chapter 7: Efficient Resourcing and Effective Governance through School Complexes

Public school complexes: Multiple public schools will be brought together in an organizational and administrative unit called the school complex. The school complex will become the basic unit of educational administration of the public school system, and will be developed accordingly.

1. This provision will be in contradiction to the norms of RIE Act 2009 wherein schools were to be provided within 1 km radius for primary and within 3 KM for upper Primary students. In this provision the norms of complex is being made as per suitability of resources not on the suitability of children. We are afraid 7-8 km distant schools will be too far for students and they will become drop out
2. The school complex should never be encouraged without school mapping exercise to

ascertain the availability of x/public schools to children as per RIE norms.

Chapter 8 Regulation and Accreditation of School Education To regulate the schools the provision of independent, state-wide, regulatory body called the State School Regulatory Authority (SSRA) is a welcome initiative.

1. However as per our constitutional provisions none of the executive bodies can make policies other than legislative. So how come they will be making policies. They can only advise to the policy makers of legislature,

School Quality Assessment and Accreditation Framework: The SCERT will develop a School Quality Assessment and Accreditation Framework (SQAAF) for each State.

- This will be used by the SSRA for its regulation of schools based on a system of accreditation seems a positive step. But Schools will be free to choose any curriculum or develop their own should never be acceptable as it will be against the spirit of 'Common School System' and sometimes a Pandora box of multiple problem at various locations and communities.
- Ensuring security: Appropriate measures will be taken at all schools at all levels to ensure the safety of students (particularly girls and other URGs) by building safe Infrastructure.
- We suggest why hon'ble Supreme Court guidelines and MHRO as well as NCPCR guidelines are should be property enforced. Why new arrangements are required?

Chapter 4 : Curriculum and Pedagogy in Schools:

Curriculum and pedagogy will be transformed by 2022 In order to minimise rote learning 21st century skills such as critical thinking, creativity, scientific temper, communication, collaboration, multilingualism, problem solving, ethics, social responsibility, and digital literacy.

- This is a most welcome Initiative however the preparedness of teachers should be ensured and these objectives should be part of their training programme.

Chapter 5: Teachers

1. While making provisions for non deployment of teachers on no academic duties and stopping para teachers is a welcome initiative.
2. However, for promotion and salary the teachers have been categorized in 5 stages as Master teacher, Expert teacher, Proficient teacher, Early teacher (without tenure) Early

teacher (with tenure) is insulting nomenclature for teachers profession and should be scrapped.

3. There is a provision of school complex based recruitment and deployment of teacher. This means that such teachers will have complex based cadre and not the state based cadre. This will be counterproductive for the capacity building and professional development of teachers, Complex based recruitment should be avoided.
4. The common guiding set of National Professional Standards for Teachers (NPST) will be developed by 2022, coordinated by the National Council for Teacher Education (NCTE) and NCERT, while involving the SCERTs and also Periodic (annual or higher frequency) performance appraisal of teachers will be conducted. This is a welcome step.
5. With plans of inculcating new teachers for Continuous Development Program (CDP), the older teachers & their capacity building (the majority of implementers of the new courses) are not given adequate attention. Special provisions should be made to train old teachers.

Chapter 6: Equitable and Inclusive Education

1. Identification and maintenance of data of transgender, CWSN and children in difficult situations is one of the most important tasks. This task is being given to social workers, community and volunteers. Also the CSOs are being given this mammoth task. This being the responsibility of state, local authority should be asked to identify and maintain the data instead of social worker.
2. Also as per hon'ble Supreme court direction as well as RPWDA Act (amended) 2016 the identification of CWSN should have been done by state machinery within two years but now it is being given to CSO and social workers.

Other Issues:

1. The Rashtriya Shiksha Aayog (RSA) will be complete centralized authority of power where space of alternative opinion from people other than PM and nominated members will be difficult.
2. In the state also Rajya Shiksha Ayog (RSA) will also be having centralized power. Even this body is supposed to make policies which are the task of legislature.
3. The policy seems deviating from the goals of SDG4 commitment in "Ensure inclusive & equitable quality education & promote lifelong learning opportunities for all". Provisions

should be reviewed in accordance with the goals of SDG-4.

4. Policy should clearly elucidate the role of other bodies like NCPCE/SCPE/ NCTE/CABE and also inter-ministerial and inter-departmental coordination.

One of the options provided is that of co-location of ICDS and PSE. It would be important to ensure that there is no compromise on the delivery of the other services of the ICDS through the process of co-location. The suggestion of merger of smart schools has potential negative complications for this stage by significantly increasing the distance between the home and school.

While the chapter addresses the educational needs of children under three, the modalities of delivery have not been explained. There is need for universalization of aech facilities to ease women's unpaid care burden and free adolescent girls from schools

Chapter 2: Foundational Literacy and Numeracy

1. The over emphasis on remedial education particularly reading and writing makes a worrisome situation It would instead be beneficial if the description of activities at this stage addressed to a joyful learning, more organic inclusion with the remaining chapters to understand better how learning outcomes could be improve across the board.
2. It is unclear why Census based examinations are being proposed at Class 3. This is too early in the child's stage to introduce standardized external tests and may risk labeling of students.
3. National Tutors Programme: The emphasis on NTP should only be informal manner. It should not be a part of system otherwise it will dilute the formal schooling system.

Chapter 3: Reintegrating drop outs and Ensuring Universal Access to Education

While we welcome the provision Of transportation for such children we are of opinion that entire focus should be on joyful fearless quality learning and completion of education by the child.

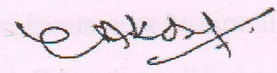
1. Engaging volunteers to take back out of school children will be nothing but a dilution of child labour Prohibition and regulation Act 1986/2016 and bonded labour Act 1976 wherein it is mandatory that labour deptt and local administration is supposed to rescue such children and provide rehabilitation package and mainstream them in school

education. How come social workers will be able to do that? (It will be against the mandatory provision of the law of the land.)

- Enabling multiple pathways to learning:

Regarding addressing the challenges of completion of a range of unrepresented groups including child labor, trafficked children, children in conflict with law, CWSN children and children in need of care and attention there is provision of e-learning, digital learning and Open Distance Learning (ODL) as well as informal education. This seems to be against the spirit of mainstream education. The children who could not attend basic schooling system how will they be able to access e-learning and digital learning?

Allowing multiple models for schools, and loosening the input restrictions of the RTE Act: Making less restrictive and loosening the RTE Act provisions will open the flood gate for diluting the norms and standards of this Act which will be grossly violated.



V.K. Ajith Kumar

President KPSTA