

# Draft National Education Policy - 2019

## A Critical Review.

By

**Dravida Munnetra Kazhagam**

Dravida Munnetra Kazhagam Government has always given top most priority for providing inclusive and quality education for all without any discrimination. It is note worthy that, Tamil Nadu was the first state to start a Primary school for every 3 km and a High School for every 5 km as early as in 1950s. During the Chief Ministership of Kalaignar M. Karunanidhi, Government of Tamil Nadu opened an Elementary School for every 1km, an Upper Primary School for every 3 km, a High School for every 5 km and a Higher Secondary School for every 7 km.

When ever the central government brought anti people education policies based on WTO-GATS agreement, DMK strongly opposed them. On 19th December 2015, former Chief Minister of Tamilnadu Kalaignar M.Karunanithi has stated "*A number of organisations urged the BJP government at the Centre not to sign WTO – GATS agreement ,which makes education as a commodity. As per the agreement, scholarship and reservation to the oppressed communities will be cancelled. Further the agreement dictates to provide only 1 percent scholarship for economically weaker sections and 1 percent for the best students.Hence DMK has been repeatedly*

*urging the BJP Government at the Centre to take all steps to withdraw from WTO – GATS agreement”.*

Many of the policy proposals in the DNEP are in accordance to the provisions of GATS and against the vision and provisions of the Constitution of India. DMK has been continuously demanding that Education must be in the State List. Kalaignar M. Karunanidhi had categorically stated on 23.7.2016, as follows ``Education must be brought back to the State List. We should not permit the rutting elephant, the new education policy to undo Tamilnadu’s excellent attainments in education and our long cherished social justice and principles of equality''. Following the footsteps of Dr. Kalaignar M. Karunanidhi, the D.M.K. strongly opposes the ‘Draft National Education Policy 2019’.

India, a country with second largest population in the world is a land of diversity. Unity in diversity is the basic unifying force in India. The Draft National Education Policy-2019 (DNEP) fails to recognise the pluralistic nature of our country while framing the DNEP.

The Draft National Education Policy 2019 is in favour of complete centralisation, privatisation, corporatisation, commercialisation and saffranisation of education. It aims to transfer the Education to the Central List from the Concurrent List. It will eliminate social justice and reservation. DNEP attempts to make education more accessible to elite and upper castes. The purpose of education is to serve the people and not the corporate business houses.

**A single, centralised overarching, micro-managed national education policy for a country of multi cultural, multi linguistic society is totally unacceptable. No developed country in the world, large or small, with federal form of government has such a centralised education policy.**

**DNEP proposes an all India formula right from anganwadi to university under one national authority. This anti people, education policy of the BJP Government is against the basic principles of Constitution like democracy, secularism, socialism and federalism.**

**DNEP infuses regressive ideas and backward thinking. It is not inculcating rational thinking and the spirit of self respect.**

**Dr.Kasturirangan's committee on DNEP has submitted a controversial and biased report, which would affect the educational rights of people of India and the existing education system.**

**The Dravida Munnetra Kazhagam (DMK) is of the view that this document has hidden agendas to deprive oppressed communities from education. The DMK which has been working for the development of oppressed people will not accept this anti people policy, which is based on GATS agreement and Manudharma.**

**DNEP is against constitution. The vision of the Constitution of India as stated in the Preamble and various provisions including Articles 14, 15, 16, 21, 23, 24, 38, 39, 39A, 41, 45, 46, 246 and 254 are clearly violated in DNEP at all stages of education. Instead of Constitutional values the DNEP is guided by the market demand especially global finance capital.**

Reservation based on social and educational backwardness is not mentioned anywhere in the DNEP. In higher education and research, scholarships for socially and educationally backward is also totally absent. In a society where the majority suffers from social oppression, the DNEP speaks only about merit and merit based scholarships. The concept of merit is an illusory social construct . DNEP proposes a National Research Foundation which makes provision for scholarship to International students (Page No. 151 Para 12.4.4) but at the same time, DNEP fails to make such provision for the socially and educationally backward classes of Indian citizens. This is against the vision and provisions of the constitution and also against the principle of social justice .The advancement of socially and educationally backward people is not possible without adequate representation in higher education institutions, which can be achieved only through guaranteed reservation in admissions, appointments and research fellowships. Absence of such provisions is a clear violation of articles 15 and 16 of the Constitution of India.

DNEP fails to recognise the federal structure of the Constitution of India and reduces the States to the position of implementing agencies of the decisions made by the central regulatory authorities.

### School Education

DNEP Chapter 1 proposes to bring in Early Childhood Care and Education (ECCE) under formal Education. The period is a transition from the learning process that started within the family to the learning process in the school. Good nutrition and most informal

way of learning needs to be assured at this stage. Merging Pre - Primary and Primary Grade 1 & 2 and prescribing a formal syllabus for Pre-Primary will not allow the Child to enjoy the Childhood. Anganwadi has a larger role and ECCE should be designed in such way that they are not merged with Grades 1 & 2 and all facilities to learn in a healthy atmosphere through the mother tongue should be ensured. Foundational course of 5 years as suggested in the DNEP is not acceptable.

DNEP Chapter 2 there is no clarity in this chapter that deals with educating the children in Grades 1 to 5. There is no clarity in the medium of instruction .National Tutors Programme (NTP), Remedial Instructional Aides Programme (RIAP) and the role of Instructional Aides (IA) termed as local heroes are nothing but undermining the role of teachers and the responsibility of the society as a whole in ensuring the enrolment and education of Children. This chapter remains very vague without proper understanding of actual needs that may differ from State to State. The NTP & RIAP are against the principle of equal access to education for all. Quality care and education can only be given by the trained teachers to all especially the dropouts and children with special needs and that responsibility should not be given to the NTP and RIAP.

Proposals in DNEP Chapter 3,especially in Para 3.12 is paradigm shift from input method to output method. Alternate models of education that is being pursued by religious and linguistic minorities is something that needs to be encouraged and it is a Fundamental Right guaranteed in the Constitution of India for

preservation of culture and language. Allowing multiple models with different infrastructure and loosening the input restrictions in schools in general is against the spirit and the provisions of the Constitution of India, especially Article 14. The DNEP fails to ensure equitable access to quality education for all Children which is possible only by establishing fully State Funded Common School System. DNEP is against Common School System and on the contrary it promotes multiplicity which will further commercialise school education.

**DNEP Chapter 4: Para 4.1.1: Restructuring school curriculum and pedagogy in a new 5+3+3+4 design:**

**5 years of the Foundational Stage: 3 years of pre-primary school and Grades 1, 2.**

**3 years of the Preparatory (or Later Primary) Stage: Grades 3, 4, 5.**

**3 years of the Middle (or Upper Primary) Stage: Grades 6, 7, 8.**

**4 years of the High (or Secondary) Stage: Grades 9, 10, 11, 12.**

Restructuring school curriculum and pedagogy in a new 5+3+3+4 design is totally unwarranted as the present system of 10 + 2 is working fine and should continue with certain changes and better provisions for learning. There is no hard separation of vocational and academic streams proposed in Para 4.4.4 . The vocational exposure proposed in para 4.6.6.1 is not in the interest of the students and highly detrimental to their vertical upward movement in the mainstream education. Exposure to three or more languages in schools is only a burden for children.

**National Text Books proposed in para 4.8 is against the federal spirit. States should be given full freedom to have their own syllabus and text books. Para 4.9.4 proposes State census examination for Grades 3, 5 & 8 students. There is no examination till completion of elementary education that is upto Grade 8. The continuous and comprehensive evaluation must continue and it should be further strengthened and democratized.**

**DNEP Chapter 5proposes recruitment and promotion of teachers without consideration to the reservation policy based on social and educational backwardness.**

**DNEP Chapter 6 fails to understand the Social and Educational Backwardness of different sections of the people due to deprivation of opportunity for education for a long time. The language used and the way the unemployed teacher graduates are projected in Para 6.3.1 is highly derogatory, objectionable and written without understanding the issue of social and educational backwardness.**

**DNEP Chapter 7 talks extensively about creation of school complexes and sharing of resources. Merger of schools will deny the students from poor families, the access to schools in the neighborhood.**

**DNEP Chapter 8says that the State School Regulatory Authority with Quasi Judicial Powers until Tribunals are established will report to the State Education Commission (SEC) headed by the Chief Minister or in the absence of SEC report straight to the Chief Minister. This is not correct.**

DMK firmly believes in the policy of “Samacheerkalvi” (Equitable system of education for all). The vision and various provisions of the Constitution of India are to ensure equality in opportunity for all people. “Samacheerkalvi” introduced by DMK government in schools ensured that.

### **Imposition of Vedic Culture.**

Instead of improving science and technology for the welfare of the people this DNEP gives importance to Sanskrit, Hindi and Vedas. In page 26, the DNEP glorifies ancient period upper caste intellectuals like Chanakya, Aryapatta, Pathanjali, Bhaskarachariya and Panini. The DNEP is not mentioning scholars of other social sections. The DNEP with ulterior motive has avoided mentioning the names of Tamil poets Thiruvalluvar, Tholkappiyar, Kamban, Ilango, Bharathiyan and Bharathidasan. It has also not mentioned any Buddhist, Jain, Christian or Islamic scholars.

The draft has enough room to make strong suspicion that Carnatic music, Hindustani Music / Bharathanatiyam alone will be given importance which is part and parcel of Brahminical lifestyle today. DNEP has not mentioned Tamil Music.

It is evident that the purpose of DNEP is not to promote scientific and technological developments, but to impose vedic culture on the whole of India.

### **Education should be in the State List**

In USA the Federal Government has no power on education; education is in the state list. In Canada, provinces have power to

make laws and policies relating to education. In Australia power to make laws on education is left to the States. In Switzerland the powers to make laws on education is given to Cantons.

In the beginning, education including universities was included in the State List of the Constitution of India. But, during the period of emergency in 1975-77, the subject Education was transferred from State List to Concurrent List. DMK has been continuously opposing this retrograde step and demanding retransfer of education from the Concurrent List to the State List.

### Against Social Justice

Report of the Ministry of Human Resource Development 2016-17 says that in India 5.2 % S.T, 14.3% S.C, 34% O.B.C, and 46.5% Forward Caste students study Higher Education. With the provisions of reservation only a small percentage of ST., SC., OBC Students could go to higher studies. If reservation opportunities are denied, it will have great negative impact and even that percentage would go down.

Already 46.5% forward caste students study higher education. This report further promotes the forward caste students in higher education. In this pathetic situation, it is felt that this policy is against the social Justice.

### Anti Reservation Policy

Reservation has been one of the main principles of D.M.K. It has been serving for the socio economic and educational development of the oppressed and down trodden people. DNEP is

against the principle of Social Justice. Based on the Mandal Commission Report the Central Government introduced 27% reservation to OBCs. But, still it is not fully implemented. In this situation, BJP Government has hurriedly introduced 10% reservation for the economically weaker section of the forward communities in education and employment. But the DNEP has purposefully avoided the word reservation in its full text. This is against the spirit of Constitution, Social Justice and Dravidian ideologies. Hence, DMK strongly opposes this anti-reservation DNEP.

### DNEP ignores Women's Education

Justice Party Government and D.M.K. Government enacted several laws and introduced several schemes for promotion of the educational development and welfare of women and child. Particularly, DMK Government provided special Reservation for women in teacher appointments in primary schools. It has enacted laws for free education of girl students upto post graduate level. Dravidian leaders Thanthai Periyar E.V.Ramasamy, Perarignar C.N.Annadurai, Dr. Kalaignar M.Karunanidhi had served for the the development of women education and women welfare. DNEP has not given importance to women education.

### Ignoring the Classical Tamil language

DNEP talks more about Sanskrit language. Only about 25000 people speak Sanskrit in India. But Sanskrit language is given undue importance in this draft. The report says that Sanskrit was base for all other languages. This is not fact. Tamil the most ancient language in India can function independently without the help of Sanskrit.

Further, after the sustained efforts of Dr. Kalaignar M. Karunanidhi, Tamil has been accorded classical language status. Such a great Tamil language has not been given due place in this report.

### **Imposition of Hindi**

DNEP proposes three languages formula in the schools which is only a guise to impose Hindi. DNEP bristles with contradictions. While lamenting the learning load on children, it imposes an incredible load of learning three languages on school children, two from class 1 and three from class 3. The D.M.K. founder and former Hon'ble Chief Minister of Tamil Nadu, Perarignar C.N.Annadurai, introduced two language formula in Tamil Nadu on 23-1-1968. Since then it has been in practice in Tamil Nadu.

### **Three Language Formula.**

DMK strongly opposes Three Language Formula proposed by this biased DNEP. In addition to three languages, DNEP also proposes school students to study more languages including foreign languages like French, German, Spanish and Japanese. (Page - 84) P 4.5.10 as optional languages. It would be very difficult for pre primary and primary students to learn more languages. .

### **Admitting Child in the formal school at the Age of 3 is against the International Norms**

The Universal Declaration of Human Rights 1948, in Article 26, talks about the Right to Education. Article 27, talks about cultural rights of communities. The U.N. Declaration of Rights of the children 1959, in classes 5 and 9 talks about the rights of children towards

education. The world conference on the education for all, held in Jomtein, Thailand in 1991, strongly emphasised education for all children. DNEP 2019 is against the declarations of these International organisations. In several countries, formal education of child starts from the age of 5. Advanced countries like America, China, Japan, England and Finland admit children in schools only after the age of 5. Contrary to this internationally accepted child education age limit, this reports says that, education of child begins from the age of 3. (Page-46). The present DNEP policy of admitting child in school for formal education at the age of 3 is against the children's rights.

### **Attempt to abolish the Midday Meals scheme**

Midday Meals Scheme was first introduced in one of the schools in Chennai Corporation by one of the founders of the Justice Party and President of Chennai Corporation Sir. P.Theagaraya Chetty. Later, Midday meals scheme was given more importance by Congress leader Perunthalaivar K.Kamaraj. During his Chief Ministership, he reintroduced midday meals scheme in schools all over Tamil Nadu. This scheme was further improved by former Chief Minister of Tamilnadu Dr. M.G.Ramachandran. Later Kalaignar M.Karunanidhi, the former Chief Minister of Tamil Nadu, further improved this scheme. He allocated more funds and extended the scheme to more schools and provided eggs.

At present, students of class 1 to 10, (age 5 to 15) have been provided midday meals. But this DNEP attempts to introduce midday meals scheme only in pre primary and primary schools. Up to 5<sup>th</sup> std.

(Page-58). So, as per this report, students of high school from 6 to 10 classes, who have been getting the benefit of midday meals will be denied. This will lead more dropouts among the poor students.

### **Caste Based Hereditary Education System (*Kulakkalvi Thittam*) in the name of Vocational Courses**

Vocational Courses are given very big importance in this DNEP. This is RSS and BJPs indirect attempt to drive away the rural students from the main stream education to their caste based hereditary occupation. Such an attempt was earlier made in the name of caste based education (*Kulakkalvi Thittam*) in Tamil Nadu. Our Dravidian leader Thanthai Periyar E.V.Ramasamy, Perarignar C.N.Annadurai, Muthamizharignar Dr. Kalaignar M.Karunanidhi, Congress leader Perunthalaivar Kamarajar, Communist leader and Scholar Jeevanantham and other leaders of Tamilnadu, vehemently protested. Due to the strong opposition the caste based hereditary education system was dropped. Now this DNEP is proposing same caste based hereditary education at national level which will be against oppressed people. It is an attempt to safe guard varnashrama dharma and caste system. This cannot be accepted.

Government should provide equal educational opportunities to both city and rural students. Instead of providing standard and quality education to students, DNEP indirectly compels them to choose vocational courses. This will not help students to get government job. Instead, this will compel them to go for their hereditary family occupation. DNEP in page 94, P 4.6.61, purposefully

talks about gardening, pottery, play making, wood work for students in name of vocational training. DNEP will segregate and drive away students towards caste based hereditary occupations. Instead of promoting science and technology, DNEP in the name of vocational courses attempts to bring back Varnashram system and take India back to feudal and pre feudal period.

### **Syllabus for Parents - a dangerous attempt**

The additional synopsis document also has got several unacceptable, impractical, contradictory and objectionable points. It is said, in page-11&12 of the MHRD Tamil Summary of DNEP that School syllabus will be framed for parents and teachers. It has ignored the rural uneducated parents. Children of such parents, who cannot get parental educational support will not be able to perform well. It will compel them to discontinue from Schools. Syllabus is framed only for Students. Teachers will teach the syllabus. There should not be syllabus for parents. DNEP proposal will be favourable to upper class only.

### **Three Months Special Camp for Class 1 Students**

The DNEP says that all students who study in Class 1, should participate in 3 months Special Camp Program. (Page-13 in Tamil Summary Copy). How a child of Class 1, could be sent to such special camps organized in faraway places. Practically this is not possible. This will only increase drop outs.

## **State Census Examination for Classes 3, 5 and 8 students**

At present students studying upto class 8 are evaluated on the basis of Continuous and Comprehensive Evaluation and promoted without detention. This system reduced stress among students and teachers. State level examinations for Grade 3, 5 and 8 proposed in DNEP will be very difficult for school students. DNEP has with ulterior motive proposed to conduct semester examinations for high school students from class 9 (Para 4.9.5). Even in higher education semester system is debatable one. Such a system will be more stressful for secondary school students. This will increase drop outs from Schools.

## **Corporate Companies in Education System in the name of Private Examination Board**

Examinations have been conducted by government. Representative bodies like school education department and universities. But, this DNEP says there will be three examination authorities. They are central government, state government and private examination board. Why and how a private examination board could conduct eight semester examinations in schools from class 9 to class 12 students. Examination is a serious, main and final evaluation process in the academic career of every student. This should be done only by teachers not by outsiders.

## **No suggestion to fill 10 lakhs teachers vacancies**

Page 115 of the report says the existence of 10 lakhs teacher vacancies but DNEP does not suggest for filling up of those vacancies. Instead of filling vacancies it talks about appointing music teachers, social workers and volunteers in schools with ulterior motive.

D P2.7 says "qualified volunteers (such as retired teachers and army officers, excellent students from neighbouring schools and passionate socially conscious college graduates from across the country ) will also be drawn on a large scale to join the NTP and the RIAP on an unpaid basis ,during the academic year as well as in the summer, as a service to the communities and to the country. Thus the NTP and RIAP programs will each have to modes .Conventional (consisting of peer tutors and paid IAs from the local community) and volunteer; both modes will be highly encouraged..." This has been proposed to pave way for Hindutva idealists to enter into education institutes as volunteers.

## **Closure of Rural Schools**

In page of 161 Para 7.1.2 says "...It will be upto the individual State governments to group schools into school complexes according to the population distribution, road connectivity and other local consideration..." it may lead to closure of thousands of schools all over the country.

## **Teachers Promotion**

DNEP proposes promotion of teachers on the basis of performance and appraisal by the Head of the School without taking into consideration the experience and seniority. It may lead to partiality and bias in consideration. It will affect the morale of teachers.

## **HIGHER EDUCATION**

### **National Level Entrance Test for admission in Colleges** **including Arts and Science College**

Conducting national level entrance test to admit students in Arts and Science colleges is a dangerous attempt. It will seal the future of students for higher studies. As admissions are done in medical colleges through NEET, DNEP suggests to conduct national level test by NTA (National Testing Agency) for admissions to degree courses in Arts and Science colleges. Those who pass the national entrance test only will be given admission in B.A., B.Sc., B.Com., and other courses in Arts and Science colleges in India. Now colleges are directly admitting students. This national level entrance test will bring hardship to students. Further, it will facilitate mushrooming of commercial coaching centres. Regulation of university including admission is a state subject under article 246 of the Constitution of India. State Government and the universities established by the state government must be allowed to decide the qualification and admission process in the colleges and universities in a state. These rights are grabbed by central educational authorities. This is against

the constitutional provisions. D.M.K. Government abolished entrance examinations to professional College admissions. DMK has been continuously opposing imposition of central government's entrance examination for the State Government controlled seats in educational institutions. DMK is against NTA conducting national level entrance examinations for Tamil Nadu State quota seats.

### **Breaking Higher education structure**

Now Colleges are affiliated to universities. Universities only confer degrees to students. Colleges do not have power to frame syllabus or to confer degrees. This DNEP suggests colleges can frame their own syllabus and offer degrees to students.

So far universities have been the syllabus framing and degree awarding authorities. University degrees have International and national level recognitions for higher studies and jobs as they are accredited by national bodies.

If colleges are allowed to confer degrees to students it will create several problems. Getting national and international accreditation and recognition to such degrees will be a serious problem. It will affect graduates' higher studies and job opportunities. This will increase drop outs at degree level. It will also create under employment, unemployment problems.

### **Bleak job opportunities**

P 10.4. says "Universities will have no affiliated colleges. All (currently) affiliated colleges, must develop into autonomous degree granting colleges (Type 3) by 2032, or merge completely with

the university that they are affiliated to, or develop into a university themselves.... Thus, there will no affiliating universities or affiliated colleges after 2032" There are about 40,000 colleges all over India. If all those institutions issue degree certificates, it would be difficult for the employing companies to find out the genuineness of the certificates. There are also the possibilities of fake degrees. Further, at present, the rural college students are getting degree from the recognized universities, which would enhance/brighten their chances of employment. On the other hand, the college degree certificates will not be of such help for students to get jobs. This would definitely darken their future (P.10.13)

### **Reducing the Number of Higher Education Institutions.**

DNEP Chapter 9 and 10 propose moving towards a higher educational system consisting of large, multi-disciplinary universities and colleges. It talks of having three types of institutions, namely the research universities, teaching universities and colleges. The policy proposes to retain only larger institutions with above 5000 students and directly proposes closure of all other smaller institutions. The policy states that it is enough to have 150 to 300 research universities, 1000 to 2000 teaching universities and 5000 to 10000 colleges. The colleges will admit 5000+ students and universities will admit 25000+ students. It boldly states that these reductions in the number of institutions from the present 40000 to 10000 i.e., 1/4th will ensure multidisciplinary and research approach to education and these 10000 institutions are not enough to cater to the whole country's higher education needs. Right now locally situated smaller

institutions, be it private or public institutions play a vital role in enrolling students from the oppressed sections. Girls are usually enrolled in the nearby local colleges. The reduction in number of institutions will reduce inclusion of the socially and educationally backward and scheduled castes into the higher education fold.

### **Closure of Colleges**

Former Chief Minister of Tamil Nadu Dr. Kalaignar M.Karunanidhi promoted school education and higher education. During DMK regime more Arts and Science colleges and schools were opened in rural areas to enable students from villages to get high standard education. Further DMK Government opened Engineering, Medical colleges and Universities in every district and enabled more professionals to emerge from rural society.

DNEP in Para 9.8 and Para 10.14 suggest that the rural colleges which lack infrastructure and education standard would be closed. Those building would be utilised as adult education centres, libraries and industrial training centers. Closure of rural colleges will be a death blow to Gandhian principle that India lives in villages. The closure of colleges is against democratisation of education. It will deprive the education rights of rural youth.

DNEP also says that further permissions will not be given to open new affiliated Arts and Science Colleges after 2020. This will affect the students and higher educational development of India.

## Abolition of UGC

DNEP says that the existing academic regulatory bodies like UGC will be abolished. It suggests to create Higher Education Grants Council. The proposal to abolish reputed democratic higher education institutions, like UGC will create multiple problems in national education system.

## Medical Education

DNEP 2019, P16.2.1 says ` The RSA (Rashtriya Shiksha Aayog) will commission a comprehensive perspective plan for professional education in India”

This will lead to centralization of medical and other professional education. This will pave way for authoritarianism in medical education.

DNEP 2019, P 16.4.2 talks about “faculty shortages in multiple ways....making use of talents from private sector, inviting overseas researchers, etc..

Lakhs of professionals across India are remaining unemployed or underemployed. The DNEP 2019 has not bothered to give employment to them and to satisfy their need and utilise them properly.

But,DNEP encourages and prefers faculties of private sector and overseas researchers who are non Indians .

DNEP -2019 , P-16.5.1 Fees for professional education , says “In line with the spirit of providing autonomy to educational institutions to charter their own course, fees for professional

education courses will be left to the management of educational institutions ,both public and private....”

This will deny the educational opportunity of the economically weaker sections of students, OBC, SC and ST students. It is worth noting that , in states like Tamil Nadu, Kerala and Puducherry fee for government quota seats and management quota seats of self financing medical colleges are fixed by ``fee fixation committee” appointed by the respective state governments.

Through this mechanism the fee for, “all the hundred percent seats” of self financing medical colleges are fixed!. Hundred percent of students are getting benefitted because of this . But, some colleges are illegally collecting more fees and it can be curbed by implementing the ‘capitation fee elimination act’ stringently. On the contrary the DNEP-2019, gives total autonomy and rights to the college management to fix fees for “all seats without cap as per their wish”. This will prevent the students of SC/ST/OBC and economically weaker sections from getting admission in medical colleges. This is against social justice.

Now for government medical colleges and institutions the uniform fee is fixed by the government for all its medical colleges .There are no differences in fees structure of government medical colleges of Tamilnadu under Tamilnadu MGR medical university. As per DNEP 2019, there can be different fee structure for each college for both government and private. This is a regressive step! The poor, economically weaker sections and oppressed community students will be affected very badly. Due to the DNEP 2019, not only private but

also the doors of government medical colleges will also be closed to them.

DNEP -2019, P-16.5.1 Fees for professional education, says ``.... Fees for professional education courses will be left to the management of educational institutions both public and private. They will however, be required to fulfill their social obligations and provide scholarships to students from the socially and economically weaker sections of society. Up to 50 % of students qualifying for admission must receive some degree of scholarships and a minimum of 20 % of these must receive full scholarships”

In this paragraph, the responsibility of providing scholarship to the students has been shifted to the colleges and the governments shirks it's responsibility. The DNEP -2019 makes it a social obligation of private and public institutions to provide scholarship to students. What will be the assurance that these institutions will fulfill the obligations? To fulfill the obligation, these institutions will collect more fees from other students. Providing scholarships to the students is the duty of the central and state governments. The term “full scholarship for a minimum of 20% students” is not only low but also obscure in terms of what constitutes as full scholarship.

The failure to clearly define what ‘some degree of scholarship’ mean and that too for 50% of the admitted students, may allow the colleges to arbitrarily fix very low sums that suits them. This could be defeating the very purpose of scholarships leaving a large majority of the students in distress.

Also for getting scholarships, the eligibility criteria has been changed. Instead of stating as 'Socially and educationally backward" it has been stated as " socially and economically backward", purposefully with ulterior motive! "Educationally backward" has been replaced with the word "Economically backward' which is unconstitutional. This is against social justice. Through this P16.5.1, it is confirmed that social justice will be endangered.

P16.5.2, says" ...equitable access shall be the most important principle guiding decisions regarding the setting up of new institutions and of investment in improving infrastructure and learning resources.."

But, the clause 16.5.1 is contradictory to 16.5.2 in principle as it defeats the equitable access to quality professional education to all as provision of scholarship is not in the hands of the government.

In P 16.8,It is stated``....This makes it important to impart medical education in an integrative health science frame work and replace the current silos in which it is imparted in India. Health care education must ensure that that skilled doctors, nurses and paramedics are trained in a scheme that appreciates pluralistic health education perspectives alongside specific disciplinary foci...”.

Modern universal scientific medicine which is based on evidence cannot be diluted in the name of pluralistic choices of people. Nevertheless, each system of medicine has its own uniqueness.

Integrating these medical systems (where each one is based on unique concepts) to modern medicine is proposed by

DNEP. This will affect the quality and standard of modern scientific medicine. This will pave the way for teaching and practicing scientifically unproven methods and pseudo medical sciences.

There is a danger of diluting modern scientific medicine by infusing obscurantist concepts and ideals in modern scientific medical education.

DNEP 2019 P16.8.1 says``...All MBBS graduates must necessarily possess : (1) medical skills (2) diagnostic skills (3) surgical skills (4) emergency skills....The compulsory rotation internship ,which has become virtually non – existent ,will be reintroduced and made more robust and effective”

DNEP 2019’s recommendation to conduct common EXIT test will be contradictory to these four objectives. Since EXIT is made as an entrance examination for PG medical admissions and screening test for Foreign medical graduates, students will start preparing for the EXIT test from the first year. Students will not concentrate on wider and deeper studies and acquiring broader medical knowledge .They will not bother about acquiring medical, surgical, diagnostic and emergency skills! This will affect the standard and quality of doctors. DNEP says Compulsory rotatory residential internship is virtually non -existent. This is not true! CRRI training is the back bone of medical training.

In some private colleges there are no adequate patients. In all government medical colleges, interns are not properly trained according to MCI norms and various types of works not related to them are imposed on them. They are doing MNA, FNA and Nurses'

(para medical) work and severe exploitation is taking place. Due to these reasons, interns are denied appropriate clinical exposure and expertise. In some places interns are preparing for PG entrance examination instead of training. It could be rectified with appropriate actions. But, EXIT is not the remedy for this.

P 16.8.2, suggests `` The first year or two of the MBBS courses will be designed as a common period for all science graduates, after which they can take up MBBS, BDS, Nursing or other specialisations .Common foundational courses based on medical pluralism will be followed by core courses focused on specific systems, and electives that encourage bridging across systems...”

Now, the first year syllabus for MBBS students has been framed according to the needs of a MBBS doctor and further future specialization by him/her. The nursing students' first year syllabus is framed according to the needs to bring up a nurse. These should not be confused. If the syllabus is made common, the standard of medical education will decline. The idea of common syllabus for AYUSH and modern scientific medicine to follow medical pluralism will dilute the modern scientific medicine and its further development and progress. This will facilitate to infuse pseudo medical sciences in the name of ancient medical system, Vedic medicine, Yoga etc. This will adversely affect the scientific and technological development of modern scientific medicine in India and will affect the people of India. They will be deprived of getting scientifically and technologically advanced medical treatment for their various ailments. The concept of

pluralistic medical education will be a retrograde step, introduced due to the ``Hindutva Ideology'' of the BJP led NDA government.

Bridge courses will affect quality and standard of medical education and medical services .This will lead to quackery and dilution of modern scientific medicine and pluralism in medical treatment as stated in DNEP-2019.

P16.8.3 says about EXIT Test ``Just as the NEET has been introduced as a common entrance examination for the MBBS ,a common EXIT examination for the MBBS will be introduced (as has been suggested in the National Medical Commission Bill) that will play a dual role as also the entrance examination for admission into postgraduate programmes. This exit examination will be administered at the end of the fourth year of the MBBS so that students are relieved of the burden of studying for a separate, competitive entrance examinations at the end of their respective period...''

The NEET examination has already usurped the rights of states in medical admissions. Due to NEET, students studying in state board syllabus, Tamil medium, Government schools and rural area schools are affected very much. This is against social justice. In this situation, DNEP 2019 has recommended for EXIT (NEXT- National Exit Test) tests. This is against social Justice, states' rights and federal system of India. Students are studying in medical colleges recognised by MCI and passing through various tough examinations conducted by universities of state and central governments or universities approved by central and state governments. Then, why should an exit

test be forced on them? The structured medical education and multiple exams during the course study prescribed by approved universities are rendered meaningless by EXIT test.

EXIT test will only be helpful to the, `` examination conducting private agencies" to appropriate more profits. Examinations have been made as profit making commodities.

As stated earlier, a single test cannot ensure the quality of a doctor. Life long continuous training in medical science and technology , better working conditions with adequate modern facilities, and with a skilled medical team , and opportunities to update their scientific and technical skills and mentoring by teachers are essential to ensure the quality of a doctor.

It is a myth that a single test can ensure the quality of a doctor. Final year examination or an examination conducted during the MBBS course is a qualifying examination. Making a qualifying examination into a competitive examination (Entrance examination for PG medical admissions) will lead to lot of confusions, corruptions and scandals. If the exit (NEXT) test is conducted at the end of fourth year, and it serves as the entrance examination for PG medical admissions, students will start preparing for this examination from the first year of MBBS. The overall reading habits to acquire more wider medical knowledge will decline. It will deteriorate the standard of medical education!

**No more PG diploma courses**

P16.8.7 says ``.....Diploma courses such as the one being offered by the College of Physicians and surgeons, Mumbai will be promoted throughout the country ,to help produce sufficient numbers of intermediate specialists”

These type of courses will create confusions. Already the diplomas have been eradicated by the central government after justifying it .Then why should diploma like courses be started again? This only will allow private players in PG medical education.

DNEP- 2019 P 18.3.1 Says`` All the other regulatory authorities such as NCTE, AICTE, MCI, BCI etc, shall transfer their regulatory function to NHERA which shall become the sole regulator for higher education. These bodies may transform themselves in PSSBs”

DNEP 2019's this recommendation will eliminate all the democratic institutions of professional courses. Authoritarianism and centralisation of professional education will lead to disastrous consequences in future. This will lead to imposition of Hindutva ideology in professional education. This will facilitate corporates to engulf the professional education system of India.

## Legal Education

The DNEP says that the curriculum of legal education has to fall back upon the culture and traditions of people, the history of legal institutions and history of Dharma over Adharma writ large in Indian Literature and Mythology (Para 16.7.2.)

One is at a loss to understand what it meant by that. If the intention is to recognize the Legal Education based on the contents of cultural, traditional and social conditions as reflected in ancient literature before 1500 or 2000 years, we soli be travelling back by thousands of year instead of taking forward the Legal Education as per the current developments that are taking place after the world becoming a Global village particularly after the First and Second world wars which have resulted in the coming into existence of League of Nations, United Nations Organisation and UN specialised agencies like I.L.O., IMF, ICJ, Human Rights Commission and so on which have aided the growth of thousands of conventions and codification of recent International Practices and Rules, that has been developing and changing every day. While the DNEP declares its laudable object is to make Legal Education globally competitive, the remedy suggested puts the check back taking us to ancient time, thus presenting a measure which is self contradictory and self conflicting.

Secondly DNEP speaks about strengthening the Legal Education heavily drawing from Dharma and Asharma at discussed, described and advocated in ancient mythology.

The word mythology denotes the study of myth and the total corpus of myths in a particular culture or religions tradition. Myths usually a story of unknown origin relating to some practice, belief, faith especially associated with religion rites and beliefs. This refers us to another pertinent and consequential question mythology of which religion, in view of the fact that Jainism, Buddhism and Hinduism all of which are in existence even from 300 BC. However it

looks absurd and ridiculous to fall back on ancient literature and mythology as the source material for updating the Legal Education to make it acceptable for the requirements of 21<sup>st</sup> century and globally competitive.

Further the bulk of Law, worldwide as known to jurists are made of customary Law; social practices evolved on current social necessity and law recede by litigations. Nowhere Law is made or connected with Dharma, Adharma or morality, though they may have some place in ethics. One should not lose sight of the fact that morality is a concept of time depending upon the composition of community of the respective country, which in most cases having its root in the religious faith. It may be noted that what is morality in one time, or in one religion may not be the same at a different time or in a different religion.

To accept morality or Dharma to be taken as a content and source to evolve law, it will end up in creating disastrous results. The use of the word Dharma indicates that DNEP is advocating Manu Dharma .

DNEP is pinning its hope to achieve such results on the philosophy taught at *Thakshashela* and *Nalauda* as well as the writings of *Chanakya* in his *Arthasasthra*. Democracy and Human Rights are of a recent development, as seen and practiced in the preceding few centuries. Moreover the concepts of *Arthesasthra* or *Manusmrithi* are all against Democratic principle and basic principles of Human Rights. Thus in the light of the above, DNEP seems to be basically under a confused state of mind. DNEP whiles attempting to

re-orient the Legal Education gets itself mixed up with problem of Legal Profession, Judicial Administration and Justice delivery mechanism.

Para:16.7 and 16.7.1. which deal with the policy on Legal Education has not said remedial measures. It should more as a declaration or political slogan or a manifesto couched in a decorative language.

### Citing Wrong Examples

If the Draft Report cites internationally famous universities such as Oxford University, Cambridge University, Harward University etc., as role model universities, we would welcome it. But P.9.1 and P.10.15 cite Nalanda University and Takshshila University as role model universities and declare Nalanda Mission and Takshshila Mission for the improvement of modern Indian Universities. The syllabus of Nalanda and Takshshila Universities are 2000 years old and out dated and they could not stand before the modern scientific test.

Further, only upper caste students were permitted in those universities. A vast majority of people were refused admission in those universities. Hence, the suggestion that the modern Indian Universities should function following the model of Nalanda and Takshshila universities cannot be accepted.

### Dual leadership in University Administration

DNEP suggests the abolition of the existing syndicate and the formation of Board of Governors. DNEP says that the Vice chancellor will be the chief executive officer of the university. But, the power of appointing officers and staff of the university and supervising the functions of the university are vest with the Chairperson Of the Board of Governors(P.17.1). This will create dual leadership and chaos in the administration of the university.

### Abolition of Syndicate

As per P .17.1 ,The Syndicate which has been so far successfully functioning in the university would be abolished. In that place new body called board of governors will be formed. The appointment of members in the initial period has not been spelt out. But, after constitution of the board of governors the members of the same body will identify be the new members and admit them to the board of governors. Further, the majority members of the board may pass a resolution against any other member and remove him from the member. The chairperson of the board can initiate this process. This will create groupism and infight among the members. The members may elect the Chaiperson of the Board or may even nominate an outsider as Chairperson.

Till now , the teachers working in higher educational institutions are given promotions on the basis of merit and seniority. But as per P 17.5 and P 9.5 of the DNEP promotions to teachers will be given only on the basis of merit and seniority will not

be taken into account. This will only lead to biased approach and corruption.

### **Concentration of authority at the Centre**

P18.5 of DNEP proposes the establishment of National Higher Educational Regulatory Authority. It would be vested with the power to regulate the functioning of all higher education organization such as UGC,AICTE,MCI,DCI etc. Any Higher body can advise and aid other institutions for better functioning .But the phrase regulatory authority seems to threaten the higher education body to adhere to its regulations. This centralization of authority will be against democratic functioning of higher education bodies.

### **Political headship to National Education Commission**

To realise the basic objective of centralisation, a spree of institutional creation is to be set off, covering the entire gamut of education, starting from Rashtriya Shiksha Aayog (National Education Commission), headed by the Prime Minister that is empowered to take all important decisions, National Education Commission, National Testing Agency, General Education Council, Higher Education Grants Commission, National Research Foundation, National Higher Educational Regulatory Authority and others. These are to be the final arbiters in their respective areas of jurisdiction. The state governments would have no say in curricular, regulatory, evaluatory, or certifying matters. Such a violation of the federal structure, which is a basic feature of the constitution, cannot be permitted.

Of the above institutions to be set up, Rashtriya Shiksha Aayog (RSA) will be the new apex body for education. "It will be responsible for developing, articulating, implementing, evaluating, and revising the vision of education". This Rashtriya Shiksha Aayog will be headed by the Prime Minister. It will be completely a central government organisation. It will be chaired by the Prime Minister, and includes the Niti Aayog Vice-chairman and several ministers. This will be a greater blow to the federal structure and the widely varied needs of our states cannot be imagined.

Further ,P18.4.2 says `` the state department of education and SHEC will not have any regulatory role or administrative control over the HEIS. Thus states are wrapped off their basic rights of providing education to all.

### **WITHDRAW**

### **THE DRAFT NATIONAL EDUCATION POLICY 2019**

Draft National Educational Policy 2019, is against the constitution, federalism and social justice. It is not addressing the core issues of scientific and technological advancement of India.

Indirectly it wants to protect caste hierarchy system and varnashrama dharma. It is against equality. It has not uphold the constitutional values such as democracy, secularism, socialism, fraternity, equality and liberty.

DNEP aims to transfer the educational powers of the state Government to the central government. It is against educational rights of children and rural people of India. It talks about closure of rural

**schools, colleges, UGC and Universities and other education institutions.**

**The alternative mechanism suggested by DNEP is more dangerous and disastrous. Instead of talking about national and people's development, it talks more about caste based education (Kualakkalvi Thittam).It talks about Hindi and Sanskrit imposition.It will hinder the educational development.**

**Based on the above valid factors, the D.M.K. Party strongly opposes and rejects this anti people, anti Constitutional and anti student, Draft National Education Policy - 2019. Hence DMKdemands the BJP Government, to withdraw this Draft National Educational Policy - 2019.Further,DMK urges the BJP government to retransfer Education from the Concurrent List to state List.**

\*\*\*

## **Acknowledgment**

**D.M.K. profusely thanks the following educationist and others, who have offered their views and opinion on the “Draft National Education Policy - 2019”.**

- 1. Dr.Sathik, Former Vice-Chancellor, University of Madras**
- 2. Dr. V.Vasanthidevi, Former Vice-Chancellor, Manonmaniyan Sundaranar University.**
- 3. Dr. Jagadesan, Former Vice-Chancellor,Bharathidasan University.**
- 4. Dr. Sabapathimohan, Former Vice-Chancellor, Manonmaniyan Sudanranar University.**
- 5. Dr. Thangaraj, Former Vice-Chancellor, Bharathiyar University.**
- 6. Dr. Kalyani Anbuselvam, Former Vice-Chancellor, Tamil Nadu Open Univeristiy.**
- 7. Dr. Janaki, Former Vice-Chancellor, Mother Terasa University.**
- 8. Dr. A. Ramachandran, Scientist, Anna University.**
- 9. Prof. K. Karunandhan, Former Syndicate Member, Madras University.**
- 10. Dr. Bernadsamy, Educationist.**
- 11. Dr. Susan Edward**

12. Dr. Murugan Pakkirisami, Tamil Nadu Educational Research Institute, Chennai.
13. Dr. Velu Thambi, Senior Scientist.
14. Thiru. A.V.Jawahar,
15. Thiru. Balaji Kaliyaperumal
16. Thiru. Muthu Ashok.
17. Thiru. K. Gowthaman, Educationist.
18. Thiru Shan Velu.
19. Pudhiyakural - an Academic Research Institute.
20. Dr. Murugan, Secretary, Madras University Teacher's Association.

and

**Hundreds of others who have sent e-mails.**

\*\*\*