

INPUTS ON THE DRAFT NATIONAL EDUCATION POLICY, 2019

**GAPS IN DNEP VIS-À-VIS PEOPLE
WITH DISABILITIES AND
CORRESPONDING INPUTS**

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**NATIONAL CENTRE FOR PROMOTION OF EMPLOYMENT OF
DISABLED PEOPLE (NCPEDP)**

AND

NATIONAL DISABILITY NETWORK

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SUMMARY OF NCPEDP'S INPUTS ON THE DRAFT NATIONAL EDUCATION POLICY, 2019

The Hon'ble Minister of HRD in his message says that, "To reap the benefits of India's demographic dividend, the Indian Government proposes to implement a National Education Policy to address needs of quality education, innovation and research aiming to make India a knowledge superpower by equipping its students with the necessary skills and knowledge and to eliminate the shortage of manpower in science, technology, academics and industry."

The draft National Education Policy however fails to meet the needs of a very significant population of India's much touted demographic dividend – people with disabilities. The Policy fails to make any reference to the country's legislation on disability - the Rights of People with Disabilities Act 2016, referring instead to a 'Persons with Disabilities Act, 2005'. The previous legislation was enacted in 1995 and was called The Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act.

The message from the Hon'ble Minister for HRD further reads that, "the NEP was planned after 'an unprecedented, collaborative, multi stakeholder, multi-pronged, bottom up, people centric, inclusive, participatory consultation process". It is noteworthy that the policy makers did not think it was important to consult with the nodal ministry for disability – the Ministry of Social Justice and Empowerment while planning the policy. Representatives from the sector and people with disabilities have also not been consulted but their contribution has been acknowledged in Appendix VII under eminent personalities. Our interactions with them reveal that they were part of no such consultation.

Early Childhood and Care and Education needs a coordinating mechanism housed at the Ministry of HRD but working along with the Ministries of Women and Child Development, Health and Family Welfare and Social Justice and Empowerment.

It is only inevitable therefore that the Policy, while very detailed and robust in its provision, fails to address the basic structures required to make education inclusive for students with disabilities in accordance with the RPwD Act 2016. The use of terminology too is inconsistent through the document – using children with special needs and differently abled, instead of student with disability or children with disability, contrary to the social model of disability propagated by the UNCRPD to which India is a signatory.

It is important to understand that disability is a cross cutting issue and applies across gender, age, religion, caste, income levels and geographies. Thus the idea of isolating disability to a

limited constituency is faulty and instead of being limited to a certain chapter (Chapter 6) should permeate across all provisions of the Policy. Disability studies must be a part of the curriculum for professional courses such as law, medicine, engineering, design, architecture, agriculture, fashion etc. so that the Principle of Universal Design is understood and implemented.

Accessibility remains the backbone of inclusion of children with disabilities and therefore accessibility of infrastructure, transport, reading materials, information (websites, apps etc), products and services must be in accessible forms as detailed under the RPwD Act and its corresponding Rules. Inclusion should not be limited to the classroom alone but must also apply to co-curricular activities including arts, sports and recreational activities.

The RPwD Act also mandates reasonable modifications in curriculum as per individual needs of children with disabilities. The Policy has omitted any mention of this integral aspect of inclusive education. The special education zones and school complexes are contrary to the provision of neighborhood schools that are mandated under the RPwD Act and also there is little thought that has gone into how a child with disability will access these complexes in the absence of accessible transport. There is also complete elimination of special education for children with disabilities and the role and status of the special educators. Home based and open learning have been excessively relied upon instead, which, given the paucity of resources and guidelines, for implementation will do more damage than good. People with disabilities have also been neglected in the section on adult education and vocational education.

Even when establishing criteria for institutional autonomy it sticks to the conventional notion of high performance based on marks and this can easily be used against admitting children with disabilities. Faculty autonomy too, while extremely progressive a provision, needs to have safeguards to prevent discrimination against students with disabilities. Teacher training and appointment too have very specific provisions in the RPwD Act and the same should be incorporated in the Policy as well.

Education is a national agenda and is the catalytic tool that can transform the future of our children and youth. Recognized as a fundamental right by the 86th Constitutional Amendment Act 2002, for all citizens of India including those with disabilities, the onus now lies on the Government to ensure that this very important yet marginalised section of the population has equal access to quality education which forms the basis of economic independence and dignity.

GAPS IN DNEP VIS-À-VIS PEOPLE WITH DISABILITIES AND CORRESPONDING INPUTS

Chapter -1 Early Childhood Care and Education: The Foundation of Learning and

Chapter 2- Foundational Literacy and Numeracy

- The extension of RTE Act (P1.8.6) should be complemented with an amendment of Section 31 of the Rights of Persons with Disabilities Act (RPwD Act), 2016 to include, in early childhood care and education, children with disabilities in the age group of 0 to 6 years of age.
- Specific surveys shall be conducted in accordance with Section 17 (a) and Section 25 (2) (c) of the RPWD Act for early identification of disabilities.
- The needs of children with disability should also be accounted for while forming the framework for ECCE by the proposed NCF (P 1.1) and redesigning the framework for Foundational Literacy and Numeracy/ The curriculum should have reasonable scope for modification as provided in Section 17 (i). Other specific measures to promote and facilitate inclusive education as provided in Section 16 and 17 of the RPWD Act, 2016 should also be accounted for to make early childhood care inclusive for children with disabilities.
- The guidelines to be framed by the NCERT in P1.1 for developing the framework for ECCE should take into account the concept of “universal design” as explained in Section 2(ze) under the Disabilities Act, 2016.
- In creating the repositories for national education and mathematics under National Teachers Portal (P 2.4) it has to be ensured that the same is available in audio, print and electronic media in accessible format as mandated under Section 42(i) of Disabilities Act, 2016.
- The government is mandated to take steps under Section 3(2) to utilise the capacity of persons with disabilities. The mandate can be fulfilled by ensuring that children are provided adequate participation in National Tutors Program (P 2.5) and Remedial Action Aids Program (P 2.6)
- The ECCE detailed plan must be developed in consultation with Ministry of Women and Child Development, Ministry of Human Resource Development, Ministry of Health and Family Welfare along with Ministry of Social Justice and Empowerment (Department for Empowerment of Disabled People) which has not been adequately mentioned in DNEP.

Chapter 3- Reintegrating Dropouts and Ensuring Universal Access to Education

- The obsession with GER as the sole yardstick of access (P3.1) shows how the question of alarmingly high dropout rates among children with disabilities is left unattended. The recent [UNESCO Report on Education 2019](#) clearly states three-fourths of the children with disabilities at the age of five years and one-fourth between 5-19 years do not go to any educational institution.
- With regard to monitoring students for attendance particular attention must be paid to students with disabilities as Section 16 (vii) of the RPWD Act 2016 mandates the government to monitor participation.
- Options of multiple models of schools must be at the sole discretion of the student and their parents. Students should not be forced in or out of any system of education on account of the determination of their 'best interests' by any other authority, or by citing education systems to be inaccessible.
- Home based education (P3.11) should not be given as an option as there are no guidelines, few resources and few mechanisms for monitoring. Further if this is given as an option schools use it as an excuse to discourage the child and his/her parents from formal schooling. Home based education also goes against the spirit of inclusive schooling as mandated under the RPWD Act. **The chapter does not address the issue of accessible transport whereas it does mention safe transport for children with disabilities.**

Chapter 4- Curriculum and Pedagogy in Schools

- P 4.4.1 seeks to restructure the whole school curriculum into a new design. The new design should be inclusive for persons with disabilities. The policy also seeks to empower students through flexible choices in courses (P 4.4). Such flexibility should be provided to children with disabilities in the form of accessible and modified curriculum as provided in Section 16 and 17 (i) of the RPWD Act.
- Medium of instruction for students with disabilities should be sign language in addition to home language and mother tongue in P 4.5.1. Similarly teachers shall be encouraged to use sign language learning materials in P 4.5.2.
- Medium of instructions for the study of literature, arts and culture in the Indian context shall also be sign language for deaf students.
- Deaf students should be engaged in the study of sign language from Foundational Stages in addition to the three languages as proposed in P 4.5.5.

- It should be ensured that teachers trained in sign language are recruited in every school (P4.5.7)
- Section 17 mandates the government to conduct regular survey of school- going children in every five years. Such surveys should be integrated with pedagogy in schools to aid in early identification of mental health cases.
- Pedagogy should be made inclusive for children with disabilities by promoting the use of appropriate alternative modes of communication as specified in Section 17 (f).
- To ensure inclusive pedagogy it is necessary that the communication between teachers and students should move away from traditional methods and include wider forms/methods like display of texts, Braille, sign language, visual language, human reader, accessible ICT etc. as provided in Section 2(f) of Disabilities Act, 2016. Thus, oral and written communication in P 4.6.3 should also include communication in sign language.
- Textbooks and materials for additional subjects should also be made available in sign language in P 4.8.3
- Section 39 mandates the government to sensitise people and create awareness to values of inclusion, tolerance, empathy and respect for diversity to further the objective behind Policy 4.6.8.2. .
- All textbooks prepared at the State level must also be available by way of Digital copy according to Section 42 in accessible formats.
- While the policy proposes increased flexibility in the choice of subjects including sports, arts and vocational crafts, the same must be offered n adapted/ accessible forms for students with disabilities on equal basis P4.4.1
- Sign language must be offered as an elective during secondary school P4.5.10

Chapter 5- Teachers

- Section 17 of RPWD Act 2016 has mandated that the government will employ and train teacher including those with disabilities qualified in sign language and Braille and those trained in teaching children with intellectual disability in addition to training staff to support inclusive education.
- None of the policy initiative related to recruitment of teacher in P 5.1.2 and ensuring diversity in P 5.1.4 or teacher requirement planning in P 5.1.10 complies with the requirements in Section 17 as stated above.

- In ensuring adequate physical infrastructure, facilities, and learning resources in P 5.2.1 it should also be ensure that such infrastructure is accessible in accordance with the [Harmonized Guidelines](#) formed by the Central Government under Section 40 of the said Act.
- A 4% reservation as provided under Section 34 of Disabilities Act, 2016 for teachers with disabilities should be incorporated in recruitment planning in P 5.1.10.
- Special educators under NCTE must be cadre based- with clearly defined roles and terms of employment.
- Training of in service teachers on teaching students with disabilities also be well planned and executed.
- It is to be noted and any inputs on Teacher Training (Pre-service and In-service) based on UDL, accessible and multisensory instructional designs will in the long term be cost and impact effective using ICT as well as other modes.

Chapter 6- Equitable and Inclusive Education

- The relevant provision under RPWD Act, 2016 (Rights of Persons with Disabilities ACT, 2016) have not been acknowledged while discussing policy initiatives for inclusive education.
- While gender has been recognised as a cross cutting issue, disability which is also a cross cutting issue has been ignored. This gap in DNEP has resulted in many statements and observations throughout the current draft policy document; and needs to be addressed.
- The education policy needs to be consistent in use of terminology throughout the document. “The term “children with disabilities or persons with disabilities” should be used instead of ‘children with special needs’ or differently abled students (P6.8.8).
- The proposal of special education zones (P6.1.2) is also discriminatory because this focusses on disadvantaged regions across the country wherein children with disabilities are not limited to these geographies alone.
- The meaning of the term persons with disabilities as explained under the definition of URGs and is limited to children with given special needs such as learning disabilities ignores that larger spectrum of disabilities as recognised under the Section 2(s) RPWD Act.
- P 6.8.1 proposes mainstreaming of children with disabilities into neighbourhood schools. P6.8.5 and 6.8.6 contains provisions for home-based and open schooling. Open schooling and home-based education cannot be the most recommended. These should be last options and explicit assurance must be made to see that every child should be in school. Special schools are not mentioned anywhere. NIOS has no specific support for children with disabilities. Therefore are not equitable.

- No guidelines are available on home-based education. Every child has a right to equitable education. Home-based education lays disproportionate pressure on parents and caregivers to look after their children's' education. Thus, it would be important to ensure that the choice of home schooling if exercised by the student, parents are not penalized for it.
- The policy has totally eliminated special schools as one of the options for education of children with disability. Thereby violating Section 31 of the RPWD Act which provides both options to children with disabilities- neighbourhood school and special school.
- All special schools (currently few being supported under select schemes of the Ministry of Social Justice and Empowerment) should be brought under purview of the Ministry of Human Resource and Development / Ministry of Education and all scholarships for students with disabilities at secondary state of education should be also disbursed by the MHRD to have a single window service and support. This will also set a trend for the States and create equitable opportunities as is done for Special Categories of Schools (Term used by RTE 2009 for schools such as NVS, KVS, Sainik Schools).
- A new stream in addition to Science, Commerce and Humanities, a new stream Creative skills should also be added as many children with disabilities find it difficult to cope with restricted choices of curriculum. The stream will give due respect and recognition to this career. However their choice of stream should not be limited to Creative Skills.

Chapter 7- Efficient Resourcing and Effective Governance through School Complexes

- It should be cleared whether special schools or open learning courses will form part of the composition of the school complexes (P 7.1.2).
- The Policy fails to address the provisions of accessible transport for students with disabilities.
- All school infrastructures (P 7.2.1) shall be accessible as per the [Harmonized Guidelines](#) on Accessibility formed by Central Government under Section 40 of the Disabilities Act, 2016. The needs of such students are acknowledged in P 7.3.3 yet, there is a need to make such provision compulsory as this is a statutorily mandated requirement.
- All reasonable accommodation should be provided as per Section 17 of the RPWD Act.
- Involvement of social workers in school complexes (P 7.2.3) shall also ensure participation of children with disabilities in addition to other socially and economically backward groups.
- Ensure participation of parents of children with disabilities in School Complex Management Committee (P 7.5.3).

- Each District Education Council (P 7.6.3) shall have a District Education Officer (DEO)/ Nodal Officer for Education as provided in Rule 7 of RPWD 2017 Rules.
- The way these school complexes have been conceptualized and explained, all teacher support required by learners in institutions located in complexes will be recruited into the school complex. This raises the following issues:
 - i. Will all these teachers be managed under the same cadre and service rules? When will this be decided and by whom?
 - ii. How it will be ensured that all schools under the complex are serving their educational requirements to provide quality education?

Chapter-8 Regulation and Accreditation of School Education

- Disability has been traditionally excluded from any regulation criteria. Steps should be taken to ensure proper representation to the needs of students with disabilities are advocated in regulatory authorities. For example, State Advisory Board on Disability as provided under Section 66 should be made part of State School Regulatory Authority (P 8.1.3), BOA (P 8.1.8) and SCERT (P 8.1.6) to ensure representation of disability issues in the regulatory system.
- Apart from flexibility in choosing curriculum (P 8.1.9) reasonable modification in curriculum at an individual level should also be ensured as mandated by Section 17.
- All mandatory requirement of inclusive education as provided in Section 16 and 17 in addition to the more general yet mandatory requirement of accessibility (Section 40), provision of ICT resources in accessible format (Section 42) and universal design shall be incorporated into School Quality Assessment and Accreditation Framework (P 8.2.1) and mechanism of audit for accreditation (P 8.2.4) (This further supports the observations made above for Chapter 5 of the DNEP).
- Diversity in private schools (P 8.3.8) shall also be expanded to mean that there shall be no discrimination in admission against any person with disability.
- In case of failure to comply with the RWPD Act 2016 and accessibility guidelines the schools should stand to lose accreditation.
- The Adolescent Education Programme (P 8.6.5) shall include measures for menstrual hygiene which shall also be inclusive for the specific needs of girls with disabilities.

Chapter 9: Quality Universities and Colleges: A New and Forward-Looking Vision for India's Higher Education System

- Faculty and institutional autonomy (P 9.3) should not compromise on the mandatory provisions of the RPWD Act related to reasonable accommodation towards inclusive education.
- Revamping of curriculum, pedagogy and assessment (P 9.4) should be the first step to ensure reasonable accommodation for the needs of persons with disabilities as mandated by Section 3 of the RPWD Act.
- It should be ensured that requirement of 5% reservation under Section 32 is not waived off in the guise of merit-based appointment. (P 9.5) or is not limited to only a few select disabilities and is also not exclusive of 'children with severe and profound disabilities'.
- Exorbitant fees structure in higher education disproportionately impacts children of leprosy affected persons because of the existing stigma around leprosy. It should be removed by providing financial support through scholarships to such students.

Chapter 10- Institutional Restructuring and Consolidation

- All new institutional architecture (P 10.3) whether research universities, teaching universities or Colleges must mandatorily comply with Section 32 of RPWD Act and provide for 5% reservation in very batch.
- It is rightly noted that streams are often granted according to conventional notion of performance judged by marks. (P 10.4) Thus, streams should be provided on the choice of students. Choice of students with disabilities should be equally respected.
- The draft NEP proposes that private HEIs will have equal access to NRF funding for research support and will be provided financial support for development, treated at par with public institutions and empowered equally (P10.10). This should be conditional to compliance with mandatory provisions of the RPWD Act. All Open and Distance Learning programs (P 10.11) should be available in accessible formats as provided under Section 42.

Chapter 11- Towards a More Liberal Education

- Every university/ multi- disciplinary institute/ research universities must have an [Equal Opportunity Policy](#) as mandated by the RPWD Act.
- All Universities should promote teaching and research in disability studies including establishment of study centers for such studies as provided under Section 47(2) of the RPWD Act.

- Libraries, labs and all resource materials must be accessible to all including people with different disabilities. (Section 40).

Chapter 12- Optimal Learning Environments and Support for Students

- All Higher Education Institutes have to provide reservation of 5% to persons with disabilities who shall be provided education on an equal basis with others. Thus, autonomy on curriculum, pedagogy and assessment (P 12.1.1 and P12.1.2) shall incorporate the needs of such students through reasonable accommodation.
- The above changes should be complemented by modification for person with disabilities in assessment criteria (P 12.1.6). National Higher Education Qualification Framework (NHEQF) shall also include such modifications and release guiding documents for the same.
- Online Digital Repository (P 12.3.5) and resources for MOOC (P 12.3.9) should available in accessible format as mandated under Section 40.
- Ensure students with disabilities are given equal opportunities to benefit from student exchange (P 12.4.6) with international universities. 5% reservation can be earmarked for all students with disabilities according to Section 32 of RPWD Act to ensure equal opportunities.
- Physical and emotional support to be provided to all students including students with disabilities and adherence to the Mental Health Care Act 2017 must be ensured (P12.2.3).
- Scholarships should be provided to deserving students with disabilities in Government and private HEIs through the proposed National Scholarship Fund. This should not include additional costs reasonable accommodation and assistive devices.

Chapter 13-Energised Engaged and Capable Faculty

- The policy initiative under P 13.1.1 to have adequate infrastructure and facilities for students with disabilities is much appreciated. However it should be made mandatory. All such infrastructure and facilities shall be standardized according to the [Harmonized Guidelines](#) formed by Central Government.
- Institutional autonomy for recruitment (P 13.1.4) should not sacrifice the statutory requirement of 4% reservation in employment under Section 34.
- All colleges and Universities must have an [Equal Opportunity Policy](#) and notify the same as per Section 21 of the RPWD Act.
- The appropriate Government should frame policies for posting and transfer of employees with disabilities including teachers and staff with disabilities - Section 20 (5).

Chapter 14- National Research Foundation

- Scope of NRF shall be expanded to include disability as an additional division and also fund research on issues related to disability (P14.1.2).
- Disability should be specified as a subject for constitution of subject committees under the council in the constitution of Division Council of National Research Foundation (P 14.1.6).
- In P 14.4.5 Research should be promoted on products of universal design, assistive aids and devices, technological innovations etc. for people with disabilities with appropriate linkages to markets and Government and experts from the disability sector should be engaged in the decision making process.
- Further, NRF should support integration of similar courses under technical education (P 16.9).

Chapter 15- Teacher Education

Inclusive Education is with meaningless without having adequate number of professional trained to ensure inclusion. Thus, it is one of the mandatory measures under Section 17 to promote and facilitate inclusive education. Keeping this requirement in mind it should be ensured that:-

- All teacher preparation programs which are proposed to move into multidisciplinary higher education institutions shall mandatorily comply with Section 32 of Disabilities Act and provide for 5% reservation to expand capacity for teachers with disabilities.
- Capacity planning for professional (15.3.2) should include reasonable accommodations as a part of teaching pedagogy. This should be a part of mandatory course in postgraduate education and research (15.3.5) and in professional development of faculty (15.3.3) (Also refer to observations for Chapter 5).
- All online education (P 15.3.4) to enable teachers to pursue higher education should be available in accessible format as is mandated by Section 40.
- Research based teacher preparation (P 15.3.5) should include extensive steps to measure data on existing number of special and inclusive educators in comparison to their need.
- Evidence based decision making to ensure adequate number of teachers and teacher educators is necessary for regulatory bodies like NCTE and RCI (its current role and practices has been overlooked by the DNEP).

Chapter-16 Professional Education

Person with disabilities have been traditionally discriminated in the sphere of professional education. The Census of India revealed that only 5% of persons with disabilities are graduates. This chapter neglects persons with disabilities as potential professionals which is in complete violation of Section 3 which provides that such persons have all the rights on an equal basis with others.

- The policy should provide for a plan of action for effective implementation of Section 34 which provides that every institution funded or supported by Government to provide 5% reservation to persons with disabilities.
- The above action should be complemented by providing reasonable accommodation to such students and accessible infrastructure complying with the [Harmonized Guidelines](#) issued by Central Government under Section 40.
- To ensure effective participation of persons with disabilities which is one of the goals of Disabilities Act, 2016 capacity planning for professional (16.2) should include reasonable accommodations as a part of teaching pedagogy under P 15.5.1. This should be a part of mandatory course in postgraduate education and research (16.3) and in professional development of faculty (P 16.4.3).
- For agriculture education (16.6) community extension services working with farmers should specifically target disabled persons Self Help Groups (SHGs) to strengthen their capacity to engage in sustainable agriculture.
- For legal education (16.7) the RPWD Act has thus far not been included as a subject for law students. It is even excluded in the specialised courses for human rights education
- For Healthcare Education (16.8) a superior quality of MBBS degree is required to be ensured for creating a more responsive healthcare system for disabled persons. It must be complemented by making similar changes in nursing education (P 16.8.4). The admission criterion must be amended for closer alignment with the RPWD Act
- There is a large scope of research beneficial to person with disabilities in the area of Technical Education (16.9). Such an opportunity must be leveraged and proper industry interaction must be provided (P 16.9.3) to create a market for such research.
- All professional courses must include content on disability as a subset.

Chapter 18- Transforming the Regulatory System

The Disabilities Act, 2016 was passed with an objective to ensure that all the person with disabilities enjoy their right on an equal basis with others but implementation remains a challenge. In this regard,

- The dimension of NHERA (P 18.1.4) should also be extended to inclusivity and accessibility in addition to good governance, financial probity, stability and educational outcomes and adherence to the provisions of the current legislations including the RWPD Act.
- All institutions should strive for inclusion through providing reservation of 5% in their batches which they are mandated to under Section 32. All such students admitted should also be provided reasonable accommodation as per Section 3 of the Disabilities Act, 2016.
- Inclusion and reasonable accommodation are essential criteria and thus should become part of regulatory structure and essential requirement of accreditation in P 18.2. The same should applicable for accreditation of professional education (P 16.5). The mandate of all standard setting bodies should also be expanded to cover these requirements. (P 18.3.1).
- Graded autonomy provides that high performing institutions would be the first to become autonomous. This process under the guise of high performance should not become exclusionary for students with disability.

Chapter 19- Technology in Education

Technology is a great enabler for people with disabilities and essential for achieving the goals of inclusive education. In this regard,

- The role of National Educational Technology Forum should be expanded to incorporate use of technology across all aspects of education to make it accessible to all including students with disabilities (P 19.2.2).
- Teacher preparation should include use of technology for better outreach and communication with students including students with disabilities.
- All the technology integrated into school curriculum (P 19.4.1), education software (P 19.4.2), online courses (19.4.4) and National Repository of Educational Data (P 19.6.1) should also be available in accessible format as mandated in Section 40.
- Video Viewing (P 19.4.3) should be substantiated with subtitles to ensure it is accessible to deaf students. Similarly, audio descriptions shall be added to ensure accessibility for blind students.

Chapter 20 -Vocational Education

Section 3 of the RPwD Act ensures that persons with disabilities enjoy their rights on an equal basis with others. The complete omission of persons with disabilities in policy initiatives specific to vocational education should be rectified to comply with Section 19 of Disabilities Act to ensure:

- Inclusion of persons with disabilities while integrating vocational education into secondary and higher education (P 20.1.1.), ensuring adequate support and facilities.
- That the disaggregated data on the progress in skill training and self-employment is prepared while gathering data in P 20.1.6. Such data must also be used to update National Qualifications Register (P 20.2.3)
- Reasonable accommodation for all disabilities as understood in Section 2(y) in made part of National Skills Qualification Framework (P 20.2.1).
- In addition to enhancing the work of local crafts, persons and artisans (P 20.6.1) sufficient support must be provided to person with disabilities trained in vocational education. Specific measures have been mandated under Section 19 which should become part of the policy as well like,
 - Provisions of loans at concessional rates
 - Marketing of products made by persons with disabilities

All mainstream skilling courses should be inclusive and accessible to participants with disabilities

Chapter 21- Adult Education

The objective of achieving 100% adult literacy rates is impossible without the involvement of 2.68 Crores disabled persons in India, [45% of whom are illiterate](#). The government under Section 18 is mandated to promote and ensure participation of person with disabilities in adult education equally with others. The policy on the other hand has completely omitted persons with disabilities under this chapter.

- The National Curriculum Framework for Adult Education (P 21.1.2) shall ensure reasonable accommodation for persons with disabilities which is necessary to ensure non-discrimination as mandated under Section 3.
- Teaching learning material should be available in accessible formats. (P 21.1.3)

- The infrastructure shall comply with the [Harmonized Guidelines](#) formed under Disability Rules, 2017 by Central Government under Section 40 of the Act.
- In complete violation of Section 18, [Saakshar Bharat Program](#) has no component for persons with disabilities. The same should be made compliant with the Act. Additionally, National Adult Tutors Program (NATP) shall ensure specific targeted action plan for persons with disabilities.
- When emphasis for adult education is being laid on women (P 21.4.4) efforts should be taken to ensure that women with disabilities are also targeted on an equal basis as mandated in Section 4.
- When raising large scale public awareness of literacy mission (P 21.4.5), specific awareness campaign shall undertake to ensure participation of persons with disabilities are included in curriculum as provided in Section 39.

Chapter 22- Promotion of Indian Languages

- The policy has taken an appreciable initiative of standardization of Indian Sign Language (P4.5.4). This step should be complemented by making this standardized version a part of four year integrated B.Ed. program to be made part of teacher education as done for other languages under P 22.1. This will fulfill government's mandate under Section 16 (v) of ensuring that education to persons who are blind or deaf. These examples are available in the [RCI Curriculum](#) already in force by many universities since 2015 which is in consonance with NCTE regulation of 2014.
- The government is mandated to provide trained professional at all levels of school education under Section 17 (d). Thus, under P 22.2 at least one teacher at each school complex should be available trained in ISL.

Chapter 23- Rashtriya Shiksha Aayog

The constitution of a new RSA for developing the future vision of India should ensure (P 23.1) adequate representation of the needs of children/persons with disabilities. Thus,

- The membership of RSA (P 23.5) does not mention any representation from the Central Advisory Board on Disability as constituted under Section 60 of the Disabilities Act, 2016. This Board acts as the national level consultative on all disability matters and has been mandated to facilitate continuous evolution of policy for persons with disabilities. (Section 65)

- In the membership of Advisory Council (P 23.13) members of civil society are included. This must include representatives from the disability sector.
- The policy initiative merging the role of MHRD with RSA (P 23.11) has omitted that Ministry of Social Justice and Empowerment has also been entrusted with the mandate of special education. The regulatory organizations needs to be cleared and merged with RSA for better coordination.

Addendum- Making it happen

In Addendum 1 pertaining to financing, the policy has addressed the gaps where the additional monetary resources shall be required. It makes no mention of the additional expenditure that will be incurred in integrating children with disabilities into mainstream schools as targeted in 6.8.1.

Further, the policy has encouraged a lot of private philanthropic activity (A 1.2.6), CSR funds (A 1.3.1.2) and support to private institutions (A 1.3.3.4) to address the deficit of public financing (A1.2.1). This raises two concerns for children with disabilities.

- Firstly, that excessive focus on philanthropic activity may perpetuate a charity and segregation model that has been in vogue for centuries.
- Secondly, Section 16 of RPWD Act only mandates institutions funded and recognised by government to provide for inclusive education. Thus the cleavage between legislative mandate and policy goals have to be clearly addressed.

In Addendum 2 pertaining to policy implementation, the policy has only outlined the role of Ministry of Human Resource and Development and the proposed Ministry of Education. The role of Ministry of Social Justice and Empowerment (as special education come under its purview) shall also be clearly highlighted.

Further, there shall also be a coordinating mechanism between the Ministry of Human Resource and Development, Ministry of Social Justice and Empowerment and Ministry of Health and Family Welfare for efficient and unobstructed administration of all spheres of education.

Similarly there should also be a coordination mechanism between NCERT, Ministry of Human Resource and Development, DIET, SSM and Ministry of Social Justice and Empowerment.