Working Paper on Inclusive Education - Call for Inputs to the NEP 2021
(prepared by Baela Raza Jamil -CEO ITA – for ITA1 and the Working Group on Inclusive Education)

Since 2010/11 post 18th Amendment, reference its 4th schedule and abolition of the concurrent list2 there has been a shift whereby provinces have the paramount power for making decisions on policy, curriculum, medium of instruction, resources and implementation of education without any encumbrance from the federal level (Ministry of Federal Education & Professional Training/MoFE&PT). From a very brief closure of the Ministry in 2010 (April), it re-emerged within three months to fulfill its responsibilities as per the 4th schedule in 2010 summer. The key governance pivot for consensus building in the federation in the post 18th amendment period has been the Inter Provincial Education Ministerial Conference (IPEM-C) a governance mechanism developed in 2002-3 for quarterly review of the Education Sector Reforms (ESR) Action Plan 2001/2-2005/6. Beyond the ESR Action Plan the IPEM-C has continued to date as a positive catalysing platform, ably led by the MoFE&PT and its federation counterparts (provinces/area depts.).

As mentioned in the preamble to the call for the NEP 2021 (21st Dec. 2020) /Annex I, that there has been a need for a constructive role of the MoFE&PT for consensus building, continuity and support within the federation. Whilst the Joint Declaration by all provinces/areas for owning, endorsing/adapting the NEP 2009 and the National Curriculum 2006/7 in September 2011, has remained in operation, there has been an absence of a coherent National Education Policy (NEP) post 18th Amendment to reflect the governance shifts since 2010. The Federal Ministry, however, has continued to reclaim space for the National Curriculum Framework (NSF) 20173, initiating the national curriculum exercise culminating in the Single National Curriculum (SNC) 2020-22; Pakistan’s participation in the international assessment for grade 4 or TIMMS in 2018/194 and more recently in the excellent national coordination of the COVID1-9 emergency response5. The latter has spanned consensus on school closures/reopening; promotion and examinations, tech-ed/blended learning, guidelines and SOPs for safety of children, teachers and schooling systems through an equity lens to leave behind no ‘area or region’ in the country.

Thus the invitation/call for NEP 2021 invokes the principles of ‘inter-dependence and national convergence for public good pertaining to: standards, educational stages (primary, middle, high etc.), system of exam and admissions, teacher management standards, etc.” without undermining ‘provincial and area autonomy ..on policies for e.g. language of instruction, number of years for early childhood education etc.” There is clearly a need for a NEP 2021 that combines the two necessary tendencies in the federation ‘across geographic and thematic areas that could be documented as a ‘Policy’ document, ensuring the best interests of the children of Pakistan without inequity”.

The call does not refer to the aborted exercise of the draft NEP 2017 (24 months process) that was almost adopted and is hosted on the Ministry’s website6. The citizens of Pakistan residing within their provincial and area jurisdiction acknowledge the recent positive actions of the MoFE&PT in making the SNC approach more inclusive and progressively open by sharing zero subject drafts (primary/middle grades)

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1 ITA is undertaking a thematic consultation -for the NEP 2021 in the next 3 weeks); in 2016-17 too ITA engaged in a nationwide consultation targeting youth for the draft NEP 2017/18 too http://itacec.org/nep.php
2 https://pakistanconstitutionlaw.com/4thschedule-legislative-lists/
5 http://mofept.gov.pk/Detail/MEcoveryNik2DEyY2RhMy002DU3LTg3OTEtNTI2ZTIxYzYwMDA5
6 ITA was heavily engaged in a youth based consultation on the NEP 2018 invited by the MoFE&PT at one of the IPEM-C(Quetta) where the Ministry agreed for ITA with youth mobilization on NEP inputs across Pakistan: the relevant references and reports for NEP consultations were placed on ITA’s website that were valuable and still remain so today: http://itacec.org/nep.php

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Working Paper I ITA NEP 2021 to Share
7 with all citizens and the call for inputs to the NEP 2021. For the record, both the NEP 2009 and the draft NEP 2017/18 were developed through consensus building processes, albeit federally led and coordinated by the ministry. Likewise, this time around, the pattern is no different; inviting public opinion on fundamental design principles of convergence, thematic areas etc. and building on the National Education Policy Framework 2018

What is clear at the outset during the current COVID-19 period that Education Policymaking cannot be business as usual. Pakistan is after all on the digital/blended learning accelerator by default since COVID-19 and now increasingly so by design; we have been suffering and continue to suffer from learning losses and also enrolment losses, especially of girls with extended shut down of schools. At the same time there is a public rallying cry around better education/learning for national public good and the best interest of the children, adolescents and youth. This may be an opportunity for really building back better with inclusive principles and practices, and continuing challenges of COVID-19; Climate Change, Learning Losses and, Inclusion.

Thus, in such a context the call for NEP 2021 is opportune, with a narrative that can be a true departure from the factory-based, oppressive, victorian and colonial derivative models of education. Indeed the baggage can be shed towards a more contemporary model that builds boldly on transversal & breadth of skills, embracing multiple intelligences within local contexts/history civilizations spanning 10,000 years (Mehergarh); learning through exploration, care, emotional expression and play, 6Cs (Communication, Collaboration, Creativity, Content, Critical Thinking, Confidence) technology and ed-tech/blended learning; artificial intelligence. The paradigm shift for education and learning should embrace a long-term investment and commitment to language/medium of instruction and a shift from high stakes board exams clubbed from grades 9-12 to tertiary level, to an emphasis on foundational learning from ECCE to grade 3 for more successful transitions at upper primary, secondary, TEVT and even tertiary levels.

The NEP 2021 design should also bring the Constitutional Fundamental Right Article 25 A for all 5-16 year olds out of the closet after a decade of state dithering and avoiding implementation of the 5 enacted laws (federal/provincial), which are by and large well aligned with the SDG 4 goal, targets and indicators.

Given the challenges and opportunities there are concerns at the outset by civil society organizations and academia consortiums/alliances such as the Working Group on Inclusive Education -:. (full at annex I)

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7 http://www.mofept.gov.pk/Detail/NWJmMmM2YTQtM2YyYi00NjJkLTgzNDEtYz0xMl1MTlIY2Qw
8 http://mofept.gov.pk/PolicyDetail/MGnxNjQwNyUtYy0vZS00OGZiL2NyYWtMjNhMjFmNgzy2U2
Annex: I

Transparency

- A section of the Ministry’s website should be devoted to the policy making process where the public will be able to find updates; (currently very sparse/no sections)
- The policy should be published first in a draft version, inviting further feedback, before a final version is published.

Inclusivity

Education is a public concern and, therefore, democratic principles require that the consultative process should be carried out in a manner that encourages feedback from a wide range of people. Given the context of Pakistan, the current approach of requesting feedback through an English language notice and an email address (see annexure below) is not likely to be very inclusive. **Consultation should be carried out in Urdu (other languages), in addition to English**;

Unreasonable time span for NEP 2021 Finalization – Three months

- Policy making takes a much longer time and needs analysis, evidence and consultation, all of which take time.
- Usually, the curriculum making exercise follows a new policy. In our case, the work on the Single National Curriculum is already in an advanced stage. How will the government influence the Curriculum through its new policy?

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The working group on Inclusive Education well versed with all NEPs since 1947, has also engaged extensively with SNC 2020 Primary level on principles of Inclusion and Medium of instruction which is equally relevant to the NEP 2021 exercise

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Meanwhile the MoFE&T has requested feedback for the following, which can be adjusted and prioritized independently through consultations.

- What are the key aspects of Policy convergence that should be included in the document?
- What are the suggested chapters/topics to cover in the policy document for example it could include the following:
  a. Standardizing Educational stages and ages from ECE – Tertiary Education
  b. Inclusive Education
  c. Accelerated Learning and Adult Literacy
  d. Technical and Vocational Education in Schools
  e. Skills Training
  f. Standardizing transitions from school to college and University.
  g. Standardizing Data regimes for reporting on national and international education indicators.
  h. International Collaboration

This Policy document should ensure a national cohesion and harmony across religious and ethnic divides as well as capturing the divergence that is absolutely essential for the context of Pakistan.

**We, as a Group thus need to address the NEP 2021 asks not from the perspective/asks of the MoFE&PT only, but also from a broader and more contemporary landscape that will remain relevant as a policy for the next 20 years.**
Subject: - Pakistan Education Policy 2021.

On the directives of the Honorable Prime Minister of Pakistan, the Ministry of Federal Education and Professional Training is embarking on the task of developing a “Pakistan Education Policy 2021” through a consultative process.

2. As you are well aware, Pakistan developed a National Education Policy in 2009. However shortly thereafter, in April 2010, the Constitution was amended and the subject of Education was fully devolved to the Provinces. After the 18th amendment the status of the NEP 2009 was revisited, and in September 2011 a Joint Declaration on Education was signed by the representatives of all the provinces and areas. The main text of the declaration stated that the federal, provincial and area representatives declare that the “National Education Policy 2009, subject to such adaptations as necessitated in view of the 18th Constitutional Amendment, shall continue to be jointly owned national document.” However, Pakistan does not have an updated comprehensive education policy document to represent the country.

3. In the current COVID-19 Emergency, the Ministry at the Federal level worked closely with the Provincial and Area Governments to ensure a coordinated national response for young people of Pakistan. The need to coordinate resulted from a desire to ensure equity for all children and institutions across the country so that no area or region is left behind due to the decisions taken.

4. The interdependence of policy decisions within the education sector is a known phenomenon and requires a national convergence on key education aspects for example standards, educational stages (primary, middle, high etc.), system of exam and admissions, teacher management standards, etc. However, this does not mean that the provincial and area autonomy could not have diverging policies for e.g. language of instruction, number of years for early childhood education etc.

5. What is required is a document to capture mutual interdependence of the education sector across geographic and thematic areas. The points of convergence and divergence should be documented as a ‘Policy’ document, ensuring that the points of divergence do not result in creating inequities for children of Pakistan.
6. Therefore, the Ministry is reaching out to all key stakeholders to develop a Pakistan Education Policy 2021 that ensures equitable opportunities for all children across the country and does not restrict their development and employability.

7. The Ministry seeks your input and feedback regarding the following:
   - What are the key aspects of Policy convergence that should be included in the document?
   - What are the suggested chapters/topics to cover in the policy document for example it could include the following:
     i. Standardizing Educational stages and ages from ECE – Tertiary Education
     j. Inclusive Education
     k. Accelerated Learning and Adult Literacy
     l. Technical and Vocational Education in Schools
     m. Skills Training
     n. Standardizing transitions from school to college and University.
     o. Standardizing Data regimes for reporting on national and international education indicators.
     p. International Collaboration

8. This Policy document should ensure a national cohesion and harmony across religious and ethnic divides as well as capturing the divergence that is absolutely essential for the context of Pakistan.

9. The Ministry will be methodically compiling this input to develop a draft document for further stakeholder consultations.

10. The process envisaged at this time includes:

    Step 1 – A broad consultative process- Dec-Jan 2021
    Step 2 – Draft document First week of Feb 2021
    Step 3 – Re-Consultation with the stakeholders Feb-March 2021
    Step 4 – Finalization of the document and approvals March 23, 2021

11. An early response will be appreciated.

(MOHYUDDIN AHMAD WANI)
Annex II:
Mr Shafqat Mahmood,  
Honourable Federal Minister for Federal Education and Professional Training

Subject: Pakistan Education Policy 2021 – Consultation Process

Through a letter dated 17th December 2020, the Ministry of Federal Education and Professional Training has initiated a process of consultation to develop ‘Pakistan Education Policy 2021’. The consultative spirit has been welcomed by many, as should be the case.

We, the undersigned, while appreciating the desire to consult would like to draw the Ministry’s attention to the procedural aspects of the policy making process. In this regard, we urge the Ministry to make the consultation process transparent and inclusive so that it will generate public trust and promote welfare of the beneficiaries of the policy. Transparency and inclusiveness in public policy are usually accepted as positive values that help informed decision making, enhance trust and generate efficient policy options. Conversely, the absence of these values in the policy making process leads to negative perceptions about the motives of policy making, alienation among the stakeholder and, eventually, difficulties in the implementation of the policy.

Transparency

We propose the following steps to bring about greater transparency in the Ministry’s effort to develop ‘Pakistan Education Policy 2021’:

- A section of the Ministry’s website should be devoted to the policy making process where the public will be able to find updates;
- All the feedback received through the consultation should be made available for public viewing on the website;
- Respondents to the consultancy requests can be asked if they would like their names to be displayed or not;
- The draft of the policy should be accompanied by Ministry’s response to the public feedback which should engage with the feedback explaining what was incorporated in the policy and what was not, which associated explanation;
- The policy should be published first in a draft version, inviting further feedback, before a final version is published.

Inclusivity

Education is a public concern and, therefore, democratic principles require that the consultative process should be carried out in a manner that encourages feedback from a wide range of people. Given the context of Pakistan, the current approach of requesting feedback through an English language notice and an email address (see annexure below) is not likely to be very inclusive. In this regard, we propose the following to make the consultation process more inclusive:

- Consultation should be carried out in Urdu, in addition to English;
• Given the wide penetration of social media, consultation should also be carried out through a Facebook page and a WhatsApp number. The latter will allow people to record and send their messages orally;
• Inclusivity can also be increased by designing a focused questionnaire on key aspects of the policy through which feedback can be solicited.

Additionally, we would like the Ministry to consider the following issues which concern us as educationists:
• **The timespan of six-months to formulate a policy is unreasonable. Policy making takes a much longer time and needs analysis, evidence and consultation, all of which take time.**
• **Usually, the curriculum making exercise follows a new policy. In our case, the work on the Single National Curriculum is already in an advanced stage. How will the government influence the Curriculum through its new policy?**
• **At what point would a draft policy be made available for public review and what would be the modality of that review?**
• **Who are the people making the policy and who would be responding to the input from the public?**

The above considerations will require additional resources and extended timelines for policy formulation but the resulting benefits in the form of a policy that will be widely owned, and which will have trust of the people far outweigh the additional costs.

**Annexure: MoFE&PT Announcement on NEP 2021**

[http://www.mofept.gov.pk/ProjectDetail/MDJmZWYzOWMtMjA0NC00Yjg3LWE2MGUtOTAxYWU5ZTgwMTBj](http://www.mofept.gov.pk/ProjectDetail/MDJmZWYzOWMtMjA0NC00Yjg3LWE2MGUtOTAxYWU5ZTgwMTBj)

On the directions of the Prime Minister of Pakistan the Ministry of Federal Education and Professional Training is working on Pakistan National Education Policy 2021.

You are most welcome to share your input to guide us in developing a living document to enable our future generations to be a source of greatness for our country.

Everyone’s suggestion count for National Harmony and inclusive future!
Be part of this historic process.
Email your suggestions at [pakistaneducationpolicy2021@gmail.com](mailto:pakistaneducationpolicy2021@gmail.com)