



NATIONAL EDUCATION POLICY FRAMEWORK 2023

Civil Society Observations

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Compiled by Coalition for Educational Development - CED

Introduction

Coalition for Educational Development (CED) is a network of Civil Society organizations working towards promoting quality education in Sri Lanka. CED has been engaged in promoting meaningful citizen's participation in education policy development. We have conducted a number of research and studies in the education sector to collect evidence-based data for our advocacy initiatives. CED had consultations with different segments of communities on education reforms and based on the findings of such deliberations, we have submitted civil society proposals on education reforms in 2012, 2018 and 2019. We recognize the significance of having a National Policy for Education and appreciate the initiatives of the government to reform the entire education system. As a civil society stakeholder, we have deliberated on the proposed policy framework and wish to submit our observations for your kind attention and consideration. It should be mentioned that these are our overall observations on the broad areas in this policy document. We believe that you will prepare more detailed procedures and work plans in the due course of time and appreciate if you could provide us an opportunity to meet with you in this process.

In line with the main three (3) policy domains identified in the policy framework, our overall observations are also presented according to these thematic areas. In addition, we have included our observations with general comments on the policy framework.

Overall observations:

1. The goal of the policy framework “Sustainably enhance the Access, Quality, Relevance and Digital Transformation of the education system through systemic changes to the Teaching, Learning & Credentialing, Governance and Investments & Resources domains to expedite economic and social development” has been able to identify the areas that need to be focused and the systemic approaches that need to be utilized. Identifying the importance of digital technology is significant and however, we would like to propose that this should not present as a separate component but should be embedded in every component.
2. The policy document has given reference to some of the previous policy frameworks/ reports that are sources of data and information for the current policy framework. However, we believe that in addition to that, there are other sources of data and information such as LLRC report, Report on the youth unrest etc. that could be useful to further develop NEFP.
3. Obtaining views and suggestions of different stakeholders of the community in developing the policy framework is a welcome move and it would ensure policy coherence and community ownership facilitating smooth implementation of the policy at ground level. The consultation process that followed in the policy development stage is not clearly mentioned in the policy framework. We would suggest that a wider stakeholder consultation be adopted in the policy formulation process.

4. Sri Lanka has ratified several international instruments with commitment to progressively implement them. The Sustainable Development Goals – Agenda 2030 (SDG) is one of them. The Goal four (04) of the agenda specially mentions the needs for inclusive quality and equity education for all. The policy document states that it will cover the period of next ten years. We need to ensure that the policies are aligned with the targets mentioned in the SDGs that need to be achieved by the year 2030. Moreover, Sri Lanka made a declaration at the Transformation Education Summit (TES) held in July, 2022 with commitment to incorporate SDG 4 Goals in national plans of curriculum modernization, and transform the education recalling the Sendai Framework on Disaster Risk Reduction and Paris Principles on Climate Change. We trust that NEPF needs to pay more attention to the SDG and TES commitments especially with regard to the access and quality of the education.
5. We appreciate the approaches of the policy framework for enhancing the access, quality and relevance of the education system in Sri Lanka. Meanwhile we observe that some of the tasks/targets have overlooked the ground realities. For example, resource constraints in providing opportunities to learn in the English medium and access to a hybrid education system need attention. There are immense disparities in terms of physical and human resource allocations in this area. Therefore, we would like to emphasize the need for and a robust data and information gathering system in order to identify gaps and find remedial methods.
6. We have to be mindful that education is a devolved subject in Sri Lanka. We observe that the NEPF has proposed to establish central authorities to regulate the sectors that is already administered under the provincial councils. Therefore, some constitutional amendments are needed to implement some of the reforms. The political viability of this recommendation needs serious attention. At the same time, reference is given to setting up of new entities/bodies to regulate the education sector. It has also mentioned that these institutions have autonomy in their operations. However, the composition of these boards/ entities is not adequately explained.
7. Although Sri Lanka has achieved the gender parity in education these positive achievements has not been reflected in the social economic context. Gender issues in Sri Lanka is somewhat different from the trends in other countries. There is a need to promote the enrolment of males in higher education and at the same time participation of the females in non-traditional economic sector has to be encouraged. Further, the education policies should be focused on eradicating of social norms and traditions that promote gender discrimination/violence.
8. Policy implementation is equally important as policy decision making. It requires resources, especially financial resources for successful implementation. Many a time this issue will come up at the implementation stage. In view of the ongoing economic crisis, the policy framework has to plan this requirement and indicate how to find it. If not, the policy is confined to the document itself.

Teaching, Learning and Credentialing

9. It should be noted that NEPF has identified most of the issues related to the above-mentioned sectors. It is really important to see that the policy has focused on the standards of the early childhood development as this is vital and policy and conventions on ECDC are not adequately implemented.
10. Providing opportunities for learning the English language is a positive step. The pedagogy of teaching the English language needs to be revisited and modernized the teaching methods. The majority of students who have learned English as a language for more than 10 years do not have the ability to write or speak a very simple sentence when they finish their school education.
11. The capacity building of teachers and revision of the content of the curriculum is significant in this regard. Equity and inclusiveness need to be assured to ensure that no one is left behind. We appreciate the positive steps proposed in the policy framework to introduce data literacy, information technology and artificial intelligence. Equal distribution of resources, infrastructure development, raising awareness for use of digital devices and online platforms are important to make it a reality. Identifying the needs to inculcate entrepreneurship, financial literacy, volunteerism is appreciative but precautions have to be taken that all these subjects would not be overburden to students. It is mentioned in the policy framework that the standardization and benchmarking of the national education against suitable international standards, however, it needs further elaboration.
12. It is observed that the private sector plays a significant role in education by setting up of a considerable number of international schools. The number of student enrollment in these schools are on the increase. However, there is no mechanism to regulate this sector or to ensure the standard of these schools. The policy framework needs to draw attention to this sector.

Teaching

13. The curricula and the practical training of the teachers training at Teacher Training Colleges have to be evaluated in order to identify the need for revision for capacity building of teachers, specially, to disseminate knowledge of new subjects, such as AI. It is also useful to evaluate the outcome of the recently introduced 13-year education system. The current disparities in human resource management in the education system in relation to teacher recruitment and deployment need to be addressed for smooth implementation of the proposed policy.

Credentialing

14. We appreciate the positive steps proposed to remove highly competitive examination centric education system which has become a heavy burden to students as well as their parents. While appreciating the new strategies presented in the NEPF on the credentialing and assessment system we would like to draw your attention on the following.

A school-based monitoring system was introduced sometime back and its outcome needs to be assessed. It is observed that one of the major weaknesses of this system

is the individual bias in assessing performance of students. Developing an AI and computerized assessment system as standard assessment tools and techniques is vital to ensure that assessment is fair, impartial and free from individual biases. In this case developing the knowledge, skills and attitudes of the teachers is a vital component.

Although there are some drawbacks there is a remarkable recognition and acceptance towards the national examinations. We need to build and ensure the same recognition and credibility for the alternative methods. This is an important factor where the provincial councils have more autonomy, authority and responsibility in the education sector.

At present, admission to state universities is based the results of the performance of GCE advanced level examination. If is not clear the system what is proposed in the policy framework to replace the present system.

Governance

15. We trust that the Ministry of Education should be more focused on the education policy direction and monitoring of policy implementation. In order to do this, the Ministry should be equipped with required human resources. Policy implementation is taken place at provincial level.

The proposed Provincial Education Boards and its composition is not clear and further elaboration is needed especially to overcome political interference in the provincial education context.

We understand the provincial education needs and priorities are different from province to province. However, the level of autonomy of provincial education entities in relation to decision making and implementation needs to be monitored by the Ministry of Education. This is imperative to maintain the standard of the education and especially, with regard to establishing institutes (universities) for higher education. The proposal to convert the existing degree awarding institutes to university should be done if they meet the standards and requirements which are to be developed by the proposed National Higher Education Commission.

16. We commend the decision to stablish National Higher Education Commission (NHEC) with responsibility for both state and non-state institutions in higher education. This commission should have autonomy and legal authority to perform its expected professional role. Standardization of quality of education and annual assessments and ratings, both of the government and private sectors, accreditation of universities and other higher education providing institutes in line with internationally accepted parameters and authority to accept/reject with justification the registration of private sector higher education providing institutions should be mandated with the proposed NHEC. Procedures followed by NHEC should be published in its website for transparency and accountability. The Minister of Education should seek views of NHEC in matters relating to higher education.

In addition, setting up the National skill commission for better coordination is vital and we would like to suggest that the private vocational training institutes also be regulated by this commission for quality assurance.

Resources and Investments

17. We observe that government allocation for education has not been optimally utilized. Schooling of the students especially in advanced level classes has been significantly decreased during the past decades. Unregulated tuition has become a burden for parents and has led to uneven competition. In addition, recent reports published by the Auditor general's department indicate that the performance of the schools has been reduced. It is vital to find a solution to optimize the usage of the resources allocated to the education sector and in order to do that new strategies have to be deployed.

At the same time, we need to make sure the inclusive and equitable access to quality education for all children. We observe that some of the proposed actions may have negative impact.

18. The proposal for financing of Primary and Secondary Education in Government schools on a per-student basis with the per-student rate needs to pay careful attention. Performance of a student will be based on the several factors and some of them are beyond their control. Allocating fund on the per student basis will make a negative impact on schools with a smaller number of students in remote and rural areas. Moreover, this proposal is urban bias and acts against the principle of equity and inclusiveness. As a result of this method, functioning of some schools in the rural and under privileged areas could be ceased. The government needs to ensure the education of all the students.

Moreover, "Financing Government schools through funding based on enrolment, existing facilities and performance" will make an adverse impact on the rural and under privileged communities.

19. We observe that a similar problem with the proposed method on financing tertiary education in state institutions by means of government funding, student contributions, and other funds generated by the institution. The student contribution will be socially very sensitive and therefore, it has to be clearly defined and carefully considered in order to prevent possible social resistance. Students come from different economic backgrounds and the ability of the parents of poor and lower middle-class families to contribute for higher education of their children has to be carefully assessed and a viable alternative need to be explored to overcome the resistance that may arise at implementation. Transition of higher education from free education to fee-levying (student contribution) without viable option (solution) will negatively affect the proposed policy in its entirety.

20. While appreciating the promotion of investing by investors in the university education and vocational training we raise concerns on leasing of the underutilized facilities of the state-owned universities. This could be interpreted as an initial move to privatize state-own universities and therefore, it is practical to make sure that state university administration is responsible for optimum use of its physical and nonphysical resources. NHEC could be mandated to monitor this activity.

General Observations:

21. We fully recognize the need for reforms of the education sector and appreciate the timely initiatives taken by government in this regard. Since education is a very important policy area of a country and it has a bearing on the nation's destination and its future generation, reforms in education are required to do very carefully consulting all stakeholders and considering expert views as well.

22. Key challenges of the education sector are discussed in the Annex 1 of the document at the end. Those are the issues which need to be elaborated with evidence. Analysis of those issues (problem analysis) is the starting point in policy development. There is a need to identify and define those problems with evidence in the present education system (status quo). It is our view that this component is to be included as a preamble to the proposed policy framework. Subsequently, policy goals and objectives are developed to overcome those problem.
23. Feasibility testing of proposed policy instruments by using some quantitative and qualitative criteria such as financially viability, socially and politically acceptability, equity, efficiency and effectiveness is very important in policy formulation. It appears that this is not done in light of any conceptual model of policy analysis. For example, the establishment of Provincial Education Boards (7.4) and Education Development Boards (7.5) come under the purview of the Provincial Councils under 13th Amendment to the Constitution (political). Moreover, the viability of the proposed student contribution to university education (social) has not been assessed sufficiently.
24. It is proposed that tertiary education is financed with government grants, government-back student loans and institutionally generated income (8.4). The implication of this proposal is that university students are required to pay for their education. This will be contradictory to the present free education policy that has been in operation since 1945. Justification with empirical evidence (in the problem analysis) is required to move away from the free education policy. The student financing is practical in the case of financially affordable parents/students. On the hand, government-back loans for economically disadvantaged students are a welcome move. But there should be an assurance on the part of government that those students are provided with employments after graduation in order to pay back the loan. This needs insightful assessment to ascertain its practicality in a debt ridden, economically struggling country for recovery. International experience shows that it will take about five years for economic recovery. This means that it is one half of the life of the policy framework.
25. Equity and inclusiveness in education can be a distance dream if existing inequalities in the distribution of physical, financial and human resources is not addressed by the policy framework as a priority. It is frequently reported in the media that schools in rural and less accessible areas of the country lack basic facilities. It is advisable and also imperative that the policy framework pays attention to this and explore options to bring this underprivileged and underserved schools to a national standard in order to make the policy goals and objectives a reality.
26. Our considered view with regard the policy framework is that there is an imbalance in addressing three policy areas; school education, vocational training and university education as the policy framework has not paid equal attention to those three areas. It seems that more attention has been paid to school education. An equal emphasis should be placed on the latter two as well. Since those two sectors and especially the university sector is embroiled with many issues it is important that the policy framework would give equal attention to them as well.