

Education Of the Weaker and Disadvantaged Sections in Private Schools in Tamilnadu-An Analysis

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Abstract

Education paves way for economic growth and development. India, being a welfare state where more than a quarter of the world's poorest people resides, has taken several progressive measures in legislation, executive orders, and policy decisions. The Right of Children to Free and Compulsory Education Act,2009 provides 25% reservation for children admitted to all unaided non-minority private schools. It strives for the constitutional mandate of social integration where the resultant cost incurred by private schools in this process has to be reimbursed by the government. The objective of this study is to critically analyze the broad vision of inclusive education, private schools participation in school education, impact of 7.5% reservation for students studied in government schools and the challenges faced in its implementation through analysis of the government data, particularly Tamil Nadu State Commission of Protection of Child Rights (TNPCR), National Commission for the Protection of Child Rights (NPCR), provisions of the Right of Children to Free and Compulsory Education act,2009; Tamil Nadu Right of Children to free and Compulsory Education Rules, 2011 and recent decisions.

Keywords: Inclusive Education, Right to education, Reservation, Tamilnadu

Introduction

"The destiny of India is being shaped in her classrooms"[1]

A Nation's progress largely depends on its progress in education provided to its citizens. The education system is a custodian of the nation's culture and acts as the creator of a new culture.[2]There is no dispute that the literacy rate in Tamil Nadu has improved way long in the past years, and there is a steady growth in the number of educational institutions. However, there are still many issues and challenges in imparting quality education to all. The field of education needs more regulations and stringent execution measures

since passing legislation mean only the first step, whereas implementation alone can ensure success. The new national educational policy 2020 sets an ambitious direction since it proposes focusing more on learning and not just schooling.[3] Community plays a crucial role in the growth of education since it is the medium in which education develops. Several children from economically weaker sections and other disadvantaged sections could not get educated despite several laws in force. The Children from the weaker economic background are also entitled for quality education. The upliftment of society is only

possible by ensuring a level playing field for all.

Judicial decisions has played an important role in making education a fundamental right.[4] The Right of Children to Free and Compulsory Education act or the Right to Education Act,2009(Hereinafter referred as RTE Act,2009) is enacted to bring reforms in education. The most significant aspect is the concept of inclusive education,[5] along with other vital features such as the student-teacher ratio[6]duties of government, local authority, and parents[7], curriculum and evaluation procedure [8]constitution of national level and state level advisory council.[9]

Social Justice and Reservation for weaker sections and other disadvantaged groups

Society initiates the law which regulates, organizes, and controls the social order.[10] Social Justice is concurrent with the just order of society. The root cause for most of the problems in our country is poverty. The state must adopt several welfare measures in order to uplift weaker sections[11] and other disadvantaged groups [12] of the society . Several legislations were enacted to provide childhood education with an objective to maximize social welfare.

The RTE Act,2009 sets norms and standards related to reserving 25% seats for children belonging to weaker sections and other disadvantaged groups in the neighbourhood school. It provides free and compulsory elementary education at the entry-level (LKG or Class One) till its completion.[13] The primary objective of the reservation is to increase the representation of underprivileged sections also to facilitate learning for any child seeking admission.

Quality education given in the early stages of life promotes greater health and success in life. "Which doesn't flex in five years does not flex after fifty years" is the literal translation of a famous Tamil proverb. An underdeveloped workforce is one of the biggest burdens to a nation's economic progress. At present, children from poor socio-economic backgrounds do not receive quality early education. Hence it is wiser to invest in

providing quality education in the early years of a person's life.[14]

Private Participation in School Education

Private entrepreneurs play a crucial role in providing quality education in our country since the state alone cannot fulfill the growing educational demands. Educating the next generation should be seen as a privilege rather than as a burden on the state.

In P.A.Inamdarcase, R.C.Lahoti CJ observed:

"Education is a national wealth which must be distributed equally and widely as far as possible in the interest of an egalitarian society to enable the country to rise high and face global competition."[15]

Private institutions fall under three categories which are a)Private institutions supported by philanthropy: gifts, donations, and contributions, b)Private institutions subsidized by the government c) self-supporting private institutions –non-profit and for-profit. Over the years, private participation in school education has increased since it has vast and quick profit potential. Private schools come in a wide variety of sizes, backgrounds, affiliations, and prestige. Private schools are instrumental in providing quality education and bringing about excellence since private schools are performing schools mainly because, unlike government institutions, the survival of these institutions depends on their performance. Private schools perform well when considering children's learning outcomes and competence in acquiring subject knowledge and skills.

Infrastructural facilities, well qualified and dedicated faculty members, regularity of teachers and students, curriculum followed are some of the factors on which quality of education depends.[16] There is a concurrent responsibility on the Central and State Governments with respect to allocation of funds.[17]

It is done with a pious objective to bear all the expenses that prevent a child from attending school and ensure access to quality primary education for economically poor children. The state does not have adequate infrastructure facilities to accommodate all children in

government schools.[18] In Tamilnadu, the per-child expenditure shall be reimbursed in accordance with the fee fixed by the committee constituted under the Tamilnadu Schools(Regulation of Collection of Fee) Act,2009 in respect of a private school.[19] Reserving quotas for weaker sections reinforces the need for corporate social responsibility on the private entrepreneurs since it enhances social integration by providing equal opportunity to all.

Significance of Inclusive education

The main facets of education include drawing out the student's best ability, character improvement, and the inculcation of values of life, its meaning, and existence. The combination of these facets needs to be the aim of every school management to subserve the interest of society at large. The values will get rooted in young minds by the mere adoption of inclusive education. The concept of inclusive education is significant here since it supports equal education to each child irrespective of their gender, creed, caste, race, social, and economic background. An educational culture does not grow in a vacuum. Society is the medium in which education develops. The concept of inclusive education upholds the value that man is not made for hate and destruction but for love and life. Thoughts of division starting from a young age will only generate evil thoughts in their minds which will be very difficult to correct at a later stage. The concept of common schools, in India, was first proposed by the Kothari Commission in 1966.[20] The existing hierarchies in access to education can only be regulated by the strict implementation of inclusive education, allowing talented children to develop their skills better. The essence of this revolutionary provision strives for social integration by bringing together children from different social, educational, economic, and cultural backgrounds.[21] This ensures progressive schooling where every child at a very young age is introduced to values of acceptance, equality, tolerance to diversity.

The Report to UNESCO of the International Commission on Education for the twenty-first century which is popularly known as Delor's Commission is significant here as it provides a

basis that needs to be considered while formulating policies. "Learning to Know, Learning to Do, Learning to Live together and Learning to Be"[22] should be the basis of any policy on education. This signifies that more emphasis needs to be given to the formation of a whole person rather than focusing on the immediate effects of learning outcomes. Inclusive education provides for such an integrated vision of education as proposed by Delor's Commission.

Inclusive education signifies that a child has a right to participate, and the school should admit the child and treat them on par with other children. Providing reservation for disadvantaged sections intends to give the best facilities to children following a child-centered and child-friendly approach. It also enhances the participatory process since the ultimate development of society is only possible by collective thinking, cooperation, and growth. The image of a child regarding their future is enlarged, enriched, and improved by inclusive education. It also provides for learning by living, participation, and self-experience of the society which will help them develop the qualities of tolerance and acceptance. Indian society is highly stratified based on many factors such as caste, community, religion, language, social, economic, and educational status. The nation will be safe only in the hands of those who hold great values in their life. Better enforcement of the provision ensure reducing social category gaps in school education as proposed in National Education Policy 2020.

Critical analysis of The Tamil Nadu Right of Children to Free and Compulsory Education Rules,2011

The rules specifically indicate need for quality education by providing guidelines for self-discipline also the role status of the contemporary teacher.[23] National Education Policy,2020 also states that the teacher must be at the center of the fundamental reforms in education.[24] The Rules enacted by the Tamil Nadu government specify the need for special training for children,[25] duties of local authorities,[26] and responsibilities of schools and teachers. [27]A critical analysis of the provisions shows as follows:

a.Criteria to determine the deserved groups: Tamilnadu rules do not specifically define neither economically weaker sections nor disadvantaged sections. Only a permanent resident of the state can apply. The income limit has been specified to be two lakh for economically weaker sections.[28]

b.Entry level class: Tamilnadu Rules does not mention specifically about the entry-level class as to whether it is Lower Kindergarten(LKG) or Class I.

b.Neighbourhood: According to the rules, the limits of the neighborhood within which a school shall be established should be within one kilometer and three kilometers for children in classes I to V and VI to VIII accordingly. The State government is directed to provide free transportation in places where there are no other facilities.[29]

c.Reimbursement: The Local authority shall sanction the reimbursement amount in accordance with the list of students admitted[30] for each academic year in two installments after verification of the list provided.[31]

d.No segregation of classes

Children admitted under quota system shall not be segregated from the other children.[32]

e. Free textbooks and Uniforms

Tamilnadu rules specify that the children admitted under S.12(1)(c) are entitled to free textbooks, writing materials, and uniforms.[33]

The Tamilnadu RTE Portal: The admission process has been made online since 2017 to ensure transparency in admissions. On perusal of the portal, it is found that the district-wise school list for all 37 districts except Mayiladuthurai(carved out from Nagapattinam district on 28th December 2020) has been provided with the number of schools in each district. Tiruvallur district has the most number of 558 private schools followed by Chennai which has 438 institutions.[34] Entry level classes for all the schools have been given as LKG. However, the age limit has been informed for applicants to both LKG and

Standard I through various means. The portal also provides contact numbers for district-level RTE coordinators. Children belonging to economically weaker sections had to submit income certificates obtained from Tahsildar.[35]

A Public interest litigation was filed in *M.Mahendran V.The State of Tamilnadu*[36], where the petitioner pointed out the difficulty in completing the five-step online admission process. However, the court dismissed the petition after careful consideration of the materials placed before them stating that the guidelines issued by the government for implementation were proper. A well-defined mechanism has been put in place and remedial measures were also provided in case of any issues.

Challenges in Implementation:

In Tamilnadu, the RTE,2009 admissions started with only about 49,400 students in private schools in 2013-14. The school education department took several steps to ensure that private schools implement reservations for entry-level (LKG or Class one).[37] CBSE schools continue to have a poor track record concerning the implementation of the Act.[38] According to the latest available annual report of Tamilnadu State Commission of Protection of Child Rights (TNPCR) (2018-2019), many private schools maintained an adamant attitude not to admit students under the RTE Act,2009. The TNPCR intervened in many cases, and 298 seats were allotted to the children who were denied admission.[39] The report mentions that several school authorities were summoned who initially refused to give admission under quota and directed them to take immediate action concerning the complaints received. Also, the commission recommends the education department take stringent action on private schools if they do not comply with the RTE requirements.[40] However, in the future goals of the commission, no measures were mentioned with respect to proper implementation of quota admissions.[41]

1.Ignorance of Rules: Lack of awareness of the rules and the absence of support structure such as procuring documents for submitting

applications creates barriers for many parents to process their application.

2. Poor fees reimbursement: There is considerable delay with respect to reimbursement of fees. The directorate of school education has informed the schools that once the Union Ministry of Human resources development (MHRD) releases its share, state governments will pay the balance amount to schools.

3. Selection of schools within 1 Km radius from their residence

The neighborhood school concept had put barriers in getting admission under the 25% quota since those from rural habitations find it very difficult to seek admission in low-budget private schools.

4. Post admission challenges :

This includes parents being asked to pay for books, uniforms, etc under the pretext that only tuition fees will be reimbursed by the government. This is in clear violation of TN RTE rules which states that the school must bear all the expenses of children under the reservation quota.

5. Cannot Transfer children to another school under the same scheme

Parents who are forced to migrate or study in schools that face sudden closure cannot transfer their children under the same quota. Children studying in government schools have got the right to transfer but the same right is not made available for children under RTE quota.

6. "Creamy layer" among the caste groups grabs others opportunity

The State government's rules permit SC, ST, and OBC parents to submit caste certificates rather than income proof documents for children belonging to socially and educationally backward communities. This provision has been used by the "creamy layer" within these caste groups whose children are ineligible for quota admission [42] because they can very well afford the fees charged by private schools. However, this denies the

opportunity of other eligible child who is from a poor economic background.

In *Society for Unaided Private Schools of Rajasthan V. Union of India* [43] and *Pramati Educational and Cultural Trust V. Union of India* [44], the court held that minority schools would be excluded from the ambit of this provision.

In *Soujanya Patel Trust and Others V. State of Karnataka and Others* [45] the misuse of the provision by few private schools have been addressed that many private schools attempted to evade admissions under S.12(1)(c). The court upheld the Karnataka government order prescribing the mode of determination of seats both at LKG and I Standard since it was passed to address the gap. The reasoning given by the court, in this case, was that the government is bearing the cost of education of those children. For this purpose, state can issue guidelines under s.35(2) of the act and Article 162 of the constitution.

In *Union of India and another V. Ashish (minor) and another* [46] a writ petition was filed against Sainik School by a student claiming that he belonged to scheduled caste and also the economically disadvantaged section of society. It was held that though Sainik schools come under specified category schools [47] under RTE act the mandate for 25% reservation was not applicable since they start class at Class VI and not Class I.

A Public interest litigation was filed in *M. Mahendran V. The State of Tamilnadu* [48], where the petitioner pointed out the difficulty in completing the five-step online admission process. However, the court dismissed the petition after careful consideration of the materials placed before them stating that the guidelines issued by the government for implementation were proper. A well-defined mechanism has been put in place and remedial measures were also provided in case of any issues.

In *D.A.V Boys senior secondary School V. State of Tamilnadu* [49], a government order issued under Rule 9 of TN RTE Rules, 2010 was challenged. Petitioner contended that the fees reimbursement made in two installments in an academic year puts the school into great

financial stress. It was contended that the impugned rule is leading to backlogs in repayment of salaries, dues, and other incentives. The court pointed out that the petitioner had only made some bald averments without submitting details about financial liability which the school had to face. Also, no details were provided as to when and how fees are collected from other children. The court held that since the state is bearing the entire expenditure paid in two installments after verifying the enrollments, it cannot be said to be violative of fundamental rights.

In *M.Abhimanyu and others V.The Government of India*[50], petitioners have approached the high court since their children were not admitted to the respondent schools. The Court rejected the petition since there were no concrete details regarding the admission made by those schools and the respondent school has taken a stand as they have filled seats as per guidelines. Also, the court pointed out that the petitioners have not exhausted the remedy provided under the grievance redressal mechanism and local authority as provided in RTE Rules, 2011.

In *Vibashri V.Government of Tamilnadu*[51], Petitioner's daughter who completed Pre K.G in the respondent school was denied admission to L.K.G as he failed to pay annual fees, uniform, and books. Also, the petitioner misbehaved by making complaints to the police, media, and the C.B.S.E authorities against the school management. The court held that the default committed by the petitioner by non-payment of fees is not a statutory violation and that he is ready to pay the requisite amount. Hence school authorities cannot deny admission to an innocent child as per section 16 of the RTE Act, a child cannot be expelled from the school. Also, the proviso to section 12(1)(c) states that elementary education should include pre-school education also.

In *B.Padmanathan V.State of Tamilnadu*[52], the Madurai high court bench dealt with admission issues concerning neighborhood criteria as per Tamilnadu Rules 2011. In the said case, the Petitioner contended irregularities in the admission held in the respondent's school. The respondent denied admission to the petitioner's child since their

residence is within 1.9 Kilometer whereas the act mandates it to be 1 Kilometer. Since RTE Act is a beneficial legislation, some other child was duly placed in the category and seats are filled transparently following mandates of law and petitioner cannot override and bye-pass opportunity of another child. Hence the petition was dismissed. In *M.L.Suresh Babu V.Government of Tamilnadu*[53], a writ petition was dismissed where there was incorrect information filed about distance.

In *Lilly Kumar and others, V.Government of Tamilnadu*[54], the petitioners who were coolie workers got their children admitted under s.12(1)(c) of the RTE act. Petitioners were paying only book fees. The respondent school is insisting petitioners pay tuition fees apart from book fees failing which threatened to terminate children from the respondent school. Petitioner also filed an application to Chief Educational Officer against this. A petition was disposed of accepting fair submission by the petitioner that the respondent's school did not demand any tuition fees in the last academic year. However, liberty is given to the petitioner to approach concerned authorities and give a complaint in case of any demand from the respondent.

The guidelines issued by the government on the recommendation of Director matriculation schools were challenged in *D.A.V Girls senior secondary school V.State of Tamilnadu* [55] that it takes away the rights of the school in selection of students. The court after careful consideration of Government Order No.66 issued by the school education department held that the petitioner has not made out any case as to how the guidelines are contrary to the RTE Rules 2011. The court stated that the guidelines have been brought in to ensure transparency in the mode of admission by ensuring that applications are made online and random selection is done in presence of a monitoring officer. The process of automatic allotment of Children to various schools by the online method cannot be said to be arbitrary or irrational which offends right to equality.

Impact of 7.5 percentage reservation policy in admissions under S.12(1)(c)

Tamilnadu being a pioneer state to provide reservation for disadvantaged sections of

society has adopted several affirmative action steps in several areas. The Justice party government in Tamilnadu initiated the reservation system hundred years ago through a communal government order for backward classes in education and public employment. The first communal order was passed in 1921 and proportional representation for communities was made in 1927. Legislations were passed time and again to uplift the marginalized and disadvantaged sections to provide a level playing field for all. "The Tamil Nadu Admission to Undergraduate Courses in Medicine, Dentistry, Indian Medicine and Homeopathy on preferential basis to students of Government Schools Act, 2020" was passed to give 7.5% reservation for students who studied in government schools. This was done based on Justice P Kalaiarasan Commission. [56] Through a government order 7.5% horizontal reservation quota was adopted in medical admissions. Statement of objects and reasons for the bill acknowledges the quality of education provided in private schools among other factors. The reservation for government school students has cut down admissions under the RTE Act, 2009 by 29% compared to last academic year [57] which in a way turned to be blessing in disguise for private school managements. An analysis of the litigations from candidates claiming quota benefits reminds of the famous quote of Sir John Salmond that Law is no doubt a remedy for greater evils but it brings evils of its own. The said reservation has opened for plenty of litigations claiming their eligibility to avail the reservation, however, the court maintained a strict approach that to avail the special benefit, a candidate should satisfy all the requirements as mentioned in the act.

In *S.Preethi V.The State of Tamilnadu*[58] and *Minor A.Arivika V.The government of Tamilnadu* [59], the petitioner's daughter except in class VI has studied all other classes in government schools. The main contention of the petitioner's counsel was that a child studied under S.12(1)(c) of RTE act is deemed to be a government school student.[60] The court held that the study undertaken by the student in a Private school in class VI bars the petitioner's daughter to claim admission under preferential quota for government schools. Although the court expressed sympathy over this student's position, her claim was rejected

also because any relaxation given in the rule will open up a pandora's box of litigation.

A candidate who has resided in Tamilnadu and completed schooling in some other state is not entitled to availing reservation benefit as held in *R.Manigandan V.State of Tamilnadu* [61]. In this case, the petitioner was a resident of Villupuram District, Tamilnadu who completed his school education in government schools within the Union Territory of Puducherry. The court dismissed his writ petition on the ground that the main criteria under the act are that the candidates should have completed their schooling in the state of Tamilnadu.

In *Manimaran V.Director of School Education*[62] Petitioner's daughter belongs to scheduled caste community underwent schooling till Xth standard in government-aided school. The counsel for the petitioner contended her right under explanation to section 2(d) of the RTE act which defines "disadvantaged groups". The main contention of the government pleader was that explanation to the said section has two limbs to it. The first limb of the explanation talks about the candidates belonging to the weaker section and disadvantaged group and the second limb is about a candidate who studied till VIIIth standard in a specified category school or unaided school. In the present case, the petitioner studied in an aided school. Dismissing the petition, the court held that when government confers a special reservation for a particular class of persons, whoever seeks to fall under the category must satisfy entire requirements as provided under the government order.

The case of *Minor Soundarya V.Secretary to the Government*[63] brings out the conflict of interests concerning government sponsoring education as well as preferential quota for upliftment. Though both are enacted with the same purpose of upliftment of disadvantaged sections, there are difficulties in implementation that call for immediate attention in the larger interest of those sections. Petitioner's daughter belonging to Adi Dravidar Community secured the second rank in Karur District. As per government policy, the department of Adi Dravidar welfare used to select the top ten students from Adi

Dravidar Community and sponsor them to pursue their higher school education in private schools. Petitioner's daughter completed her higher secondary education in a private school where entire fees were paid by the government. Her claim to be included in preferential quota for medical admissions was rejected on the ground that even though her education was sponsored by the government, she had the benefit of being educated in a private school with a completely different academic environment, and in that process, she had enjoyed an edge over students from government-run schools. The petitioner's daughter submitted a claim that if they had any knowledge about the 7.5 % reservation quota, they would not have accepted the sponsorship of the government to study in a private school.

This case highlights the fact that the well-intended policy of the government to sponsor a student had in turn taken away the student's right to claim under preferential quota which would have been more beneficial for their future. It also highlights the need to analyze the rationale behind differentiating a student who studied in a private school from the first standard to the eighth standard under reservation quota to be included under the definition of government school whereas a student who studied in any one class or two classes in a private school irrespective of the fact whether it is sponsored by the government be excluded under the definition of government school. It is a well-known fact that a student who had a good foundation in the budding years of their life that is from I standard until VIII standard will have their basics well cemented and could continue to excel in the remaining part of their education. Hence in the above case, the court had given an opinion that a student who completed their education under the RTE act does not require any concessional upliftment as they are different from students who are educated from a government school. The court opined that the government should rethink this beneficial policy and come up with an equitable solution.

Conclusion

Education is undoubtedly the single most influential factor that can change the destiny of an individual and nation as a whole. It has continuous universal significance as it lays

down a firm foundation for social order. All institutions have to create an enabling environment for children to enjoy their rights and childhood. The effectiveness of any right can be best judged on the achievement of disadvantaged sections of society.

Reservation of seats for those children has provided quality education to many children hailing from underprivileged situations.[64] Section 12 (1) (c) is a revolutionary step cure the social evil of "hierarchy of access" which is prevalent in the Indian education system. To improve the scenario, we must understand that profit cannot be limited by committees or laws but only by competition in India. Only 4.7% of 8 crore students in unaided schools use this provision instead of 25% due to poor uptake and low reimbursement rates. Covid19 has been a shock to our economy and system. It has also provided an opportunity to review several sectors.[65] Admission under the reservation quota is a significant area that needs great attention, particularly in a scenario where most daily wage laborers and others remain jobless or live under deplorable economic conditions. Without regard to the situation, every child deserves quality education. The joint support of the teachers, parents, authorities, and children themselves is essential to accomplish the goal of total literacy and education in India.

States were given more autonomy in their performance which led to different states issuing rules, circulars, and notices to cater to the needs of their citizens. A perusal of nationwide report which evaluated the status quo by interviewing schools, parents, and government officials suggest that Rajasthan and Delhi use a fairly comprehensive admission procedure to reimbursement system. Admissions were done using lots in Delhi which is supervised by a representative of the Directorate of Education. Videograph of entire admission proceedings were made available for future reference which ensures transparency and accountability. The income certificate issued by the office of the district deputy commissioner is the only document accepted which also has to be backed by the employer's certification.[66] Hence Tamilnadu state needs to take more stringent measures for effective enforcement .The success largely depends on the government, private

stakeholders, parents, and the monitoring committee. The following are some of the key recommendations:

1. Private schools should be mandated to publicize the admission through RTE quota through different avenues, encouraging parents to put their wards in school.
2. It should be made mandatory that detailed information regarding students' intake and performance status be submitted year-wise to concerned government authorities.
3. RTE help center needs to be constituted in private schools for admissions to help many poor and illiterate parents.
4. Timely and adequate reimbursement mechanisms to schools should be strictly implemented.
5. Active and Collaborated participation from Government officials, Private stakeholders, and school monitoring committees will ensure the success of this provision.
6. Adequate training should be given to teachers in inclusive education since classrooms have become more socio-economically diverse. It requires more knowledge and skill to ensure the success of inclusive education. Quality education can only be ensured by giving adequate training to teachers since teachers are the backbone to the success of future generations.
7. Private schools should be instructed to indulge in multilingual teaching to ensure the quality of learning outcomes of children belonging to disadvantaged groups.
8. Education of children below six years also should be made a fundamental right, and suitable amendment needs to be made in Right to Education Act, 2009 which will reduce the confusion related to entry-level restrictions followed by schools.
9. Parents of economically weaker sections or disadvantaged groups should be made part of the parent-teacher association in schools which will enable them to address their issues and concerns.

10. No detention policy will be counterproductive since it may affect the seriousness of studies. It comprises the children's ability to withstand pressure and compete harder to excel themselves. Hence a student should only be promoted to the next class provided they are eligible otherwise the system just provides schooling but not learning.
11. Private schools can avail parental assistance to organize certain tasks to improve the learning outcome of children.

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