

COMMENTARY**HITTING THE TARGET BUT MISSING THE POINT: NATIONAL EDUCATION POLICY AND THE SHADOW EDUCATION INDUSTRY IN INDIA**

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We received our education policy after a long wait of 34 years. The document is a star-studded one with key issues related to making education a public good, ensuring learning outcomes in elementary school, revamping teacher education and the examination system, promoting different languages (primary education in mother tongue), focusing on child health and early education and so on. It is explicitly committed to providing an education system with *equitable access to the highest-quality education for all learners regardless of social or economic backgrounds (NEP 2020:3)*. The Indian education system is undergoing rapid changes, especially since the post-economic reforms of the 1990s. State provisioning has become weaker in light of rising private sector engagement with school education. The private coaching industry in particular has gained an unofficial foothold in the sector and is increasingly becoming inevitable today.

NEP 2020 took a bold step in acknowledging the coaching culture as a problematic trend resulting from the high-stakes nature of secondary and university entrance examinations. The claim here is that exams are based on memorisation and coaching centres pander to this exam culture. Coaching culture replaces the time of true learning with excessive exam coaching and preparation and forces students to learn a narrow band of material in a single stream (NEP 2020:18).

The policy clearly states the need to change the exam system in order to facilitate holistic development. It argues for eliminating the need to undertake coaching classes for board and entrance exams during grades 10 and 12. It argues that exams should test core capacities and competencies rather than leading to months of coaching and memorisation. Systemic reform is recommended to reduce the demand for private coaching. Specifically, Para 4.36-4.38

highlights the poor nature of the examination system and its link to the coaching culture. In acknowledging coaching culture as problematic, mainly because of the stress they place on students, the NEP is, in effect, hitting the target but missing the point! The focus on coaching culture is limited only to the stress it imposes on students. This claim needs further exploration, whether stress is created by coaching centres or by the syllabi, curricula, and the examination system. Does this mean that students are otherwise fine in the system if the coaching centres stop stressing students? Stress on students is a corollary of the competitive advancement that these centres promise the students when they enrol. Students knowingly and willingly enter this culture of stress, and perhaps in their understanding, it is stress now that will ensure social mobility. Coaching is no longer viewed as a workaround but as an essential step in a student's academic journey. Even the public discourse reflects this shift, with parents and students accepting coaching as a necessary investment.

The prevalence of the shadow education industry is too hard to ignore. The system is said to have expanded from having a supplementary role to having a supplanting role (Bray, 2018). Assocham (2013) reported (reporting 12 states) that at least 95% of school-going children in India attend private tuitions. This system is so robust that even high-end private schools have their own coaching centres. Private tuitions are known to maintain class differences, with children of elites going to high-end coaching centres and children of the poor going to low-paying private tuitions or no tuitions at all (Sharma, 2018). This deserves policy attention, recognition, and some mechanism to be put in place to manage its nature and role in the education sector, if it has one.

The NEP's critique captures a visible symptom but overlooks the systemic structural failures that have invited shadow education to flourish. As the Mishra Committee Report (2015) notes, the coaching industry fills an important void in the system, that is, the absence of good teaching in schools. However, it is also fundamentally changing the purpose of education from the refinement of the mind to the passing of entrance examinations.

The NEP 2020 proposes a major shift in board examinations, aiming to reduce the undue pressure placed on students, which results in dependency on the coaching culture. It argues for redesigning the examination system to focus on assessing conceptual understanding, critical thinking, and the application of knowledge, rather than rote memorisation. This reform is

intended to eliminate the need for coaching culture, under the assumption that a more meaningful assessment framework would naturally render such parallel systems obsolete. However, the policy remains notably silent on how to operationalise this shift. There is no clear roadmap for how to phase out coaching centres, and for how to handle the interim period. Questions arise such as: who will regulate the coaching sector, how such centres are to be monitored, and who is allowed to start, run and teach in them? As a result, while the NEP identifies the problem, it stops short of addressing the structural mechanisms through which coaching centres have become embedded in the current education system. This silence reflects a broader policy gap, acknowledging a systemic issue without committing to regulatory or institutional reforms that would be necessary to address it effectively.

The coaching industry in India is said to be generating revenues of more than 24,000 crore INR per year (Mishra, 2015). The growing reliance on coaching centres is not merely a response to exams; it is also a symptom of a broader systemic failure. As state-run schools struggle to deliver quality education, families turn to private coaching to compensate for institutional deficits. This trend represents a quiet withdrawal of the state from its responsibilities, especially as enshrined under the Right to Education (RTE) Act 2009. Scholars have shown that when states fail to invest in robust, equitable public education systems, market actors step in to fill the void, exacerbating inequality and commodifying learning (Rizvi and Lingard, 2010; Verger et al., 2016; Bray, 2009). This policy's silence (Rizvi and Lingard, 2010) on the issue of privatisation is telling. By not acknowledging the privatisation of education as a structural driver behind the rise of coaching culture, the policy risks misdiagnosing the problem and consequently, proposing ineffective remedies. A stress-centric view individualises what is fundamentally a systemic failure, deflecting attention from the urgent need for state investment in quality education accessible to all. 'Coaching culture' exemplifies the privatisation of education, where access to academic success is increasingly mediated by one's ability to pay. This narrow framing individualises the problem, attributing undue responsibility to students and parents, while ignoring how privatisation deepens inequalities and shifts accountability away from the state.

The policy thus fails to locate the phenomenon of coaching centres within the broader neoliberal reconfiguration of education provisioning. Scholars have argued that the rise of shadow education systems like coaching centres reflects the growing influence of market logic within education policy (Rizvi and Lingard, 2010; Ball, 2003; Verger et al., 2016; Welch,

2013). These centres thrive on competitive individualism, credentialism, and the commodification of learning, all of which are key features of neoliberal governance. This normalisation of private provision not only exacerbates social inequalities but also shifts responsibility for educational outcomes from the state to individuals and families, a hallmark of neoliberal reform agendas.

LACK OF DEFINITIONAL CLARITY

While the NEP eloquently discusses coaching culture, we still lack a definition of what coaching is. NEP does not define it. A few State Education Acts do. But there are definitional disparities (Mahendale, 2021). It is called by various names: coaching institutes, tutorial institutes, coaching classes and so on. The Andhra Pradesh Education Act, for instance, uses the term tutorial institutions, implying an institution giving coaching or instruction to 50+ candidates or employing 5+ teachers to prepare them to appear for an examination. The Arunachal Education Act (2010) uses the term tutorial institutions for registered institutions, established or run by not less than two persons for systematically imparting education or instruction to not more than 25 people in a batch in any subject to prepare them to appear for any competitive exam. Coaching institutes in Bihar are defined as institutes that help in preparation for competitive exams or academic support for more than 10 students. In Goa, coaching classes mean classes conducted by any person for coaching more than five students at a time by charging fees for a subject, but shall not include the regular classes conducted by the education institutions recognised by the government or as the case may be, by a university.

Further, some Education Acts (Kerala, Uttar Pradesh, Andhra Pradesh) also regulate shadow education on the lines of infrastructural requirements. For instance, the sanitary conditions of premises, the qualifications of teaching staff, and submission of curricula and annual reports to the state governments and seeking permission in advance for closure. Mahendale (2021) notes that while some of these regulations are available in certain states, these regulations are still weaker than the norms and standards imposed on schools. In the absence of comprehensive and unambiguous definitions of institutions, how do we make sense of these institutions and their contributions to the sector?

POLICY DISJUNCTURE AND COACHING CENTRES

In January 2024, the Ministry of Education (MoE), Government of India, released the *Guidelines for Regulation of Coaching Centres*, marking a pivotal moment in Indian education policy. The issuance of these *Guidelines* (which set minimum standards for these centres) by the same Ministry appears to legitimise the very practice that the NEP critiques. This document, for the first time, formally recognised and legalised coaching centres that have long operated in a grey policy zone. Strikingly, this move appears to contradict the spirit of the National Education Policy (NEP) 2020, which described the coaching culture as a cause of stress and inequity. These guidelines do not engage with NEP's diagnosis. We now witness the coexistence of seemingly contradictory policies within the same governmental framework. This juxtaposition exemplifies a fragmented or disjointed policy environment. These two policy documents operate in parallel yet disconnected spheres. This phenomenon can be understood through the lens of policy incoherence and the complex interplay of new and existing policies. It is a striking instance of policy disjuncture within the Ministry of Education itself.

Instead of curbing the spread of coaching, these guidelines offer a regulatory framework stipulating basic norms such as infrastructure, safety, and teacher qualifications. This effectively legalises and legitimises coaching centres, allowing them to continue and potentially expand. In fact, the guidelines acknowledge that the coaching industry is irreversible and will continue with a few regulatory measures. An unregulated and unrecognised education market is formed as a legal entity through these guidelines. Rao (2024) notes the risk that eventually they will obtain recognition instead of being registered with the commercial tax department.

These guidelines cannot be fully understood in conjunction with NEP 2020. Rather, they are better viewed as a response to the *de facto* policy environment created by the sheer scale and influence of the coaching industry. As Shore and Wright (2011) argue, policymaking does not occur in a vacuum but within 'policy worlds' shaped by institutional histories, cultural expectations, and economic pressures. New policies navigate the complex terrain of pre-existing policies, institutional norms, and stakeholder interests, often leading to inconsistencies and overlaps (Nagy, 2024). The guidelines reflect this dynamic. They are not a top-down imposition but a form of state adaptation to an already-existing social reality.

These guidelines institutionalise what was previously considered an aberration. The gap between NEP and the guidelines represents a case of neoliberal policy adaptation, legitimising shadow education due to its entrenched public demand and its alignment with competitive, individualised models of educational success. As Ball (1993) explains, such incoherence is symptomatic of a neoliberal policy assemblage, where policies are not internally-consistent scripts but assemblages shaped by multiple and often contradictory imperatives. Under neoliberal regimes, policies frequently lack cohesion because they attempt to reconcile reformist goals with market-oriented practices (Rizvi and Lingard, 2010). Thus, the NEP's concern for stress on students is not entirely abandoned but is sidelined in favour of a regulatory approach that accommodates existing institutional practices. This disarticulation reflects not just administrative oversight but a deeper ontological ambivalence about the role of the state, the market, and the private sector in shaping educational futures. This disarticulation reflects not just administrative oversight but also a deeper ideological ambivalence about the roles of the state, market, and individual in education.

SEEPAGE INTO BASIC EDUCATION AND THE ROLE OF THE STATE

A worrying trend is the downward seepage of shadow education into the foundational stages of schooling. While coaching was initially limited to secondary and higher secondary levels, it is increasingly becoming common at the primary level as well (Sharma, 2018). This shift raises serious concerns, particularly in the context of the Right to Education (RTE) Act 2009, which enshrines free and compulsory education as a state responsibility. The presence of coaching at the elementary level blurs the line between public provision and private consumption. As Verger et al. (2016) argue, this is part of a broader global trend where public responsibilities are gradually offloaded onto private actors. This trend erodes the foundational principles of the RTE Act. It also exacerbates existing inequalities, as only families with financial resources can afford early coaching, thereby giving their children a head start in an already stratified system.

CONCLUSION

The disjuncture between NEP 2020 and the 2024 Guidelines is not accidental; it reflects deeper ideological and institutional shifts under neoliberal governance. By limiting the identification of coaching culture in relation to student stress and further by legalising coaching centres (through guidelines), the state is not just recognising an informal sector, it is aligning itself with a policy that has come to see education as a private investment and learning as a

commodity. This development challenges the vision of equitable, state-funded education and demands renewed attention to the principles of social justice, especially in the context of India's constitutional and legislative commitments like the RTE.

As shadow education continues to grow and seep into foundational schooling, the state must confront a key question—is it the guarantor of equal opportunity, or merely a regulator of a competitive marketplace? If we really want to confront the complex issue of shadow education and its detrimental effect on students and the public education system, we need to have meaningful debate and dialogue among all key stakeholders, including the state and those who run the education industry.

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