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Department of Education, University of Oxford

# Stakeholder Consultations in National Education Policy (2020): A Qualitative Evaluation of Consultations in India's Education Polycscape

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*I am bound to it now, bound to the messiness, bound to the deconstruction of these post-truth games,  
bound to the idea that all research is, in some way, fiction.*

(Angelone, 2018)

## ABSTRACT

This qualitative study attempts to evaluate the consultative process of India's National Education Policy (2020). Using a systemic lens, it aims to realise two broad research objectives. Firstly, it attempts to normatively differentiate between consultation theory and practice. Secondly, it aspires to define 'good consultation' and provide a contextual and comprehensive framework for this purpose. The elite interviews of NEP's policy leaders and document analysis of critical consultation policy texts produced three central findings. Firstly, while there is a consensus on the process and outcome goals of consultations across the stakeholders, the evidence demonstrates that it is not systematically measured or understood. Secondly, the consultations only poorly address the puzzle of public involvement. There is little to no empirical evidence of ambitious participation or effective systems. Thirdly, the consultative process is substantially different in theory and implementation. This incongruence has its advantages and disadvantages and can be observed in aspects such as the use of native language, local level participation and the adoption of technology.

The policy texts and interview transcriptions were analysed using a reflexive thematic and content analysis processes, respectively. This analysis was founded on a relativist philosophy and performed through a social constructivist approach. Two insights emerged from the study and have a potential role in improving future consultative practices. First, consultations are normatively valuable and possess a *negative capability* to reform the education *policyscape*. Second, although it is evident that the critique of consultations is too perfunctory, the study concludes that it is crucial to ground policy rhetoric on policy reality to avoid such misconceptions.

Key words: Policy consultations, policymaking, participation, education policymaking, evaluation, good consultation, theory and practice, negative capability

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## LIST OF ABBREVIATIONS

S.No	Serial Number
NEP	National Education Policy
MHRD	Ministry of Human Resource and Development
PIB	Press Information Bureau
GoI	Government of India
GoK	Government of Karnataka
MoE	Ministry of Education
SC/STs	Scheduled Castes/Scheduled Tribes
MyGov	MyGov – Government’s platform for citizen engagement
ULB	Urban Local Body
GP	Gram Panchayat
Doc	Document(s)
SE	School Education
HE	Higher Education
BEO	Block Education Officer
DDPI	Deputy Director for Public Instruction
CPI	Commissioner for Public Instruction



## CHAPTER 1: INTRODUCTION

### Context: India and the New Education Policy

India is home to the world's largest education system (Bhushan et al., 2020). There were 1.09 million Government schools and 460 thousand private schools in India as of 2018, with 131 million student enrollments in the former and 119 million student enrollments in the latter (Ministry of Education, 2019 as cited in Kanwal, 2022). At the onset of COVID in 2020, there were 1043 universities, 11779 stand-alone institutions, and 42343 colleges across India (Kanwal, 2022). As per 2015-16 records, 34585000 students were enrolled in higher education in the country (MHRD, 2018). A grasp of this scale is crucial to understanding why India's education policy system deserves an examination. An important but obvious challenge of this scale is that it is difficult to manage from a public administration perspective. It is unfortunate but not entirely surprising that educational quality is still a distant dream for the subcontinent. Evidence suggests that India has been amidst a learning crisis, with nearly 50% of its students lacking basic literacy and numeracy skills (Agarwal & Bandyopadhyay, 2018; ASER, 2019; D. Johnson & Parrado, 2021). While there is no doubt that access and enrolment have improved substantially across all levels of education, this does not deny that we are far from producing satisfactory learning outcomes. COVID-19 has only deteriorated this case. The global pandemic is reported to have impacted 320 million students and resulted in a learning loss of as high as 82% in primary education (ASER, 2020; Sahni, 2020; Tilak, 2021). It is at this socio-political moment that India released its new National Education Policy (NEP) on 29 July 2020 after being approved by the Union Cabinet.

The NEP 2020 created many ripples in the policy and educational landscape of the country. It was published after 34 years of the previous policy, which was released in 1986 and revised in 1992. It is also the country's first national education policy of the 21<sup>st</sup> century. Among the many unique features of the policy is its relentless emphasis on skill-based learning and a call for a multi-disciplinary approach in primary, higher and tertiary education. It almost recommends a paradigm shift in how education is perceived, structured, and practised. Its aim to make India a "global knowledge superpower" (Ministry of Human Resource and Development [MHRD], 2020, p. 6) is reiterated with references to how the policy will institutionally and deliberately enable the integration of the local and the global. Rested on the five pillars of "Access, Equity, Quality, Affordability and Accountability" (Ministry of Human Resource and Development MHRD], 2019, p. 7), the policy suggests a reimagination and rewriting of the fundamentals of the Indian education system, making it relevant to the rapid technological and social reforms of the neoliberal world order. The policy is not only thorough but also futuristic and visionary in its approach and considerations.

The Government announced that the policy was made after ‘an unprecedented consultation process involving nearly 2 lakh suggestions from 2.5 lakhs Gram Panchayats, 6600 Blocks, 6000 ULBs, 676 Districts’ (Press Information Bureau [PIB], 2020). This rhetoric attracted overwhelming attention from national and international media, citizenry, policy think tanks, research institutes and many other sources. A quick google search of keywords ‘consultations’ and ‘NEP 2020’ yielded nearly 150 results, most of which were news articles, research papers and blog discussions. Moreover, a similar advanced search on Twitter for July 2020 to 1 August 2022 generated 35 relevant tweets and engagements. Some of these reports defined the consultative process as one of the largest in recent history (Dasgupta, 2020; ScooNews, 2020). This discourse is the motivation and inception of this study, the aims of which will be discussed in the upcoming sections.

## Objectives of the Study

Rosen(2009) argues that policy instruments perform a symbolic function besides their more utilitarian function of logically connecting processes to objectives. She urges the readers to perceive policy enterprise as a constantly interacting and mediating space of tangible and intangible actions. According to a social constructionist paradigm, the intangible nature of policy language has a ‘rhetorical function’ (2009, p. 268). The language used in or for policy plays a role in constructing the social reality that policy claims to build. She adds, “words can influence the interpretation of situations’ (2009, p. 276). Therefore, there is a need to view policy discourse as subjective, intentional and unavoidably political. Therefore, there is a need to view policy discourse as subjective, intentional and unavoidably political. This consideration helps examine the discourse on NEP consultations mentioned in the previous section (Thomas, 1995, p. 120).

The scholarship of community participation and consultations also raises similar concerns about the discourse surrounding it and its potential functions. The concept of policy consultations has long been viewed in the domain of public administration as *tokenistic* and *namesake* (Arnstein, 1969; Marais et al., 2020). According to Bishop and Davis, they function primarily as a “political label rather than a settled process” (Bishop & Davis, 2002, p. 16). In support of this thesis, Thomas argued that ‘nominal citizen participation’ should be an exception and not a norm. According to him, this undermines the legitimacy and quality of consultations.

In the context of NEP, I anchored my research in this proposition and used it as an entry point to examine the discourse of consultations in India’s education *polycscape*<sup>1</sup> (Mettler, 2014). There are three

---

<sup>1</sup> A landscape in which policies interact with each other, shaping their interests, actors and organizations.

broad objectives for this study. Firstly, I attempt to develop a contextual framework that will allow an evaluation of consultations in the context of India's NEP. Secondly, I discern how we conduct consultations in practice to differentiate them from their theoretical aspirations. Finally, I use the framework and theory-practice dichotomy to evaluate NEP's consultative process qualitatively. The preliminary research questions help realise these broad objectives.

## Research Questions

1. How are NEP's stakeholder consultations conducted in practice and how is it normatively different from the theory?
2. What is a good consultation, according to the one who consults and the one who is consulted? How do you measure good consultation?

## Chapter Overviews

The first section of the literature review will elucidate the methods and processes of literature search and review. It will be followed by a detailed explanation of the many definitions of consultations. This section is crucial to ground our understanding of existing scholarship, which will be eventually used to develop a more relevant and contextual framework for the analysis. In the following section, I will critically examine and summarize the categories of inquiry that I have used in the study. These categories will also eventually be used as initial codes in data analysis and hence play a crucial role in directing this work. Finally, a summary will synthesize the main definitions and frameworks to help read the final chapters.

The literature review will be followed by a chapter on the methodology, which will elaborate on the philosophies and processes underlying the research. Here, I will elaborate more on policy document analysis and semi-structured interviews and delineate the process of using them. After discussing the data collection procedures and reflecting on my role as a researcher, I will conclude this section with a brief overview of the ethical considerations. It will elaborate on aspects such as consent, confidentiality, rigour and how they were maintained throughout the research process.

In the findings and analysis chapter, I will outline and critically engage with the results and offer my analysis on each thematic category. The results from the policy document analysis and interviews will be combined so as not to disturb the storytelling. It will be followed by a conclusions chapter where all the descriptions in the findings chapter will be interpreted to answer the critical research questions. I

will attempt to make sense of my research and its results to present my inferences cohesively and transparently. I will also present the limitations and implications of my study, thereby opening the way to a more critical examination and adoption of my thesis for a bigger and broader scholarship.

This document ends with the acknowledgement and the bibliography chapter.

## CHAPTER 2: LITERATURE REVIEW

### Introduction

In this section, I study the existing literature on community consultations and critically evaluate their role in policymaking. To begin, I provide a systematized review of a primary literature search conducted in the first quarter of the study. The review aimed to grasp the range and substance of scholarship surrounding community participation. A total of 56 research materials were identified from four databases (Google Scholar, ScienceDirect, JSTOR, ERIC) using the keywords “participation”, “consultation”, “community”, “education”, and “policymaking”. Of the 56 studies, 53.5% were situated in the broad disciplinary domains of *public policy*, 17.86% in *natural resource and environmental management* and the rest in *public health, housing and education*. 67.86% of all studies were non-empirical. Geographical focus was another factor that was examined. 28.57% of the materials studied participation in North America followed by 25% in the UK and 16.07% in Australia. Out of the 56 studies, only one study focused on Asia and two on Africa. The following table depicts the share of materials published every decade.

Table 1: Published research materials by year

Year	Number of published materials
Before 1990	6
1990-2000	7
2001-2010	26
2011-2020	17
	56

This initial review offered me a sense of the nature and extent of scholarship. In addition to forty-six studies that were relevant from this initial list of literature, I identified and reviewed fifteen other studies that were substantive to the research question. The following sections will provide an in-depth critical synthesis of those sixty studies, all of which are cited in the bibliography.

### Theoretical framework: A systemic lens to a systemic question

*Normatively, a systemic approach means that the system should be judged as a whole in addition to the parts being judged independently.* (Mansbridge et al., 2012, p. 5)

I have adopted a systemic lens throughout this study. This position implies that the consultative processes are not perceived as a one-off event that occurred at a singular moment in policymaking but as “occurring in a deliberative context” (Mansbridge et al., 2012, p. 2). This larger context is ridden with constant and continuous interactions between individuals, institutions, processes, and outcomes. I found that this contributed to the study in multiple ways. Firstly, it helped view consultations as located in a more extensive and complex whole of policy processes. It allowed me the academic autonomy to include many actors, ask varied questions of differing natures, and introduce conceptually less significant but essential variables to my theory and analysis. With a systemic framework, it was possible to investigate all the parts without compromising any aspect of the whole. Secondly, it helped address the complexities of scale. For instance, the differentiation of NEP’s 250000 consultations based on governance level, participant groups, and approaches was imperative in condensing the discourse to a comprehensible form. Thirdly, it allowed a multifaceted discussion of *deliberative ecologies* (2012, p. 6) without digressing from the main research question. For instance, I could discuss the political nature of policymaking without essentially including that as an analytical area. A systemic approach did not simplify the process but engendered a richness to the research that would have otherwise not been possible. Along the same lines, I also claim to locate the study not within policy science but in policy scholarship. The theory of *policy scholarship* (Grace, 1995) encourages the integration of systemic relations and interactions into the analysis thereby, resisting a study of this question in isolation.

### What is consultation?

According to Thomas, public involvement is a recent concept and dates to the late 20<sup>th</sup> century. It emerged with the collapse of the *politics-administration dichotomy* (Goodnow, 1900) and the widespread acceptance of administration as a site of public involvement. This movement saw the gradual erosion of a top-down approach in public management and the rise of a bottom-up approach. The challenge in this *new public involvement* (Thomas, 1995, p. xi) was the challenge of implementation – do we know who will participate, when and how? Thomas called this the “puzzle of public involvement” (1995, p. 11). I will use the upcoming three sub-sections to answer these questions. In the first part of the literature review, I will synthesize the prominent discussions on community participation in general and community consultations in particular to arrive at a critical and nuanced definition of consultation. In the second section, I will address the puzzle of NEP’s consultative processes by examining the literature on why, who and how. Finally, I will use the available canon on measurement of consultations to develop a contextual framework that will aid the study of this research

question. I assume a pragmatist position in this project and hope, like Wengert (1976) once did, to not only ‘ponder philosophically’ but also produce something that is ‘socially helpful’.

For the scope of this research, I use the terms consultation, deliberation, involvement, and participation interchangeably. Although some scholars in the field of public policy and public administration have attempted to distinguish these terms carefully (Arnstein, 1969; Bishop & Davis, 2002; Pateman, 1970; Pellatt, 2003; Shand & Arnberg, 1996), I find it befitting to use their varied meanings and conceptualizations as I maintain that there are more similarities than differences between them. Moreover, as I am generally looking at the role of citizenry in policymaking, using these terms is helpful in more than one way.

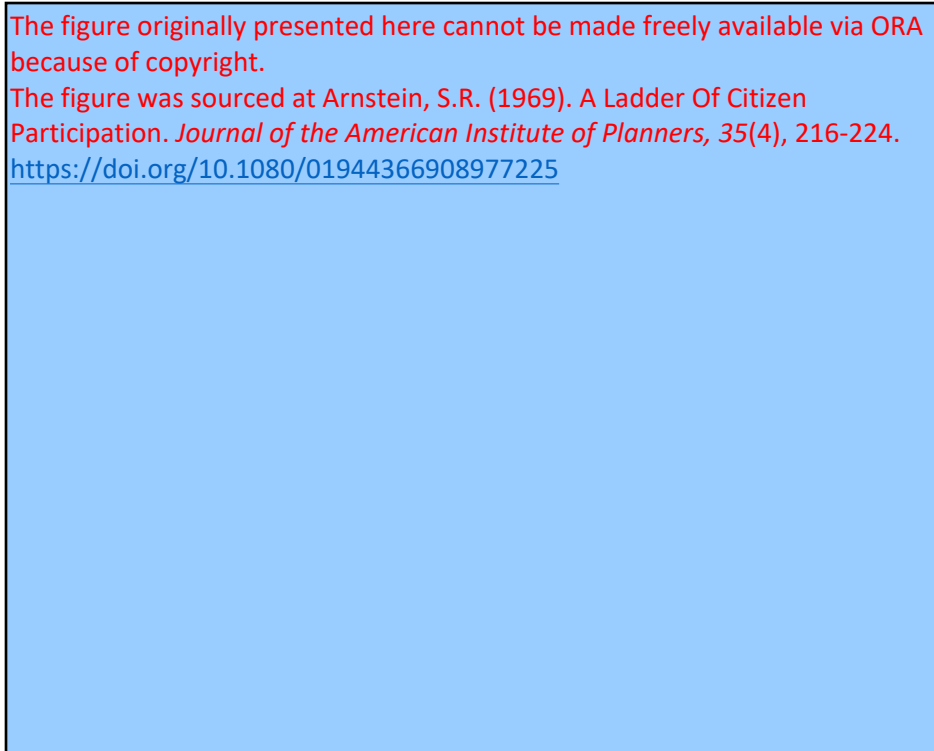
I problematize three prominent notions regarding consultations. Firstly, I argue that the existing scholarship has been too perfunctory in concluding that consultations are *euphemistic* (Arnstein, 1969) or lacking in potential for policymaking purposes (G. F. Johnson & Howsam, 2018) without citing substantial evidence for the same. Secondly, I maintain that there is no comprehensive framework to evaluate consultation processes. Most empirical work in this regard is qualitative and normative enquiries (Bell & Etherington, 1999; Kaehne & Taylor, 2015; Marais et al., 2020; Pellatt, 2003). Quantitative studies (Yang & Pandey, 2011) conducted with this aim are scarce. The non-empirical work by Edwards and Moss (2020), Johnson & Howsam (2018) and Parkhurst (2016) are helpful but are utopian and ungrounded in their proposition. There is little to no such research in the context of developing countries. Finally, I reflect on the theoretical frameworks guiding the research on consultations. Most of these studies, notwithstanding their methods, frequently locate consultation as a separate, one-off exercise occurring in a silo, insulated from its broader social, political, and economic system. I pursue and borrow from a scholarship that offers a more systemic lens.

## Defining Consultations: From old to new

### Participation as power

It is reasonable to start from Arnstein (1969), who argued that the definition of participation depends on who defines it. She defined consultation as a *tokenistic* exercise of power located at the middle rung of a ladder of participation that classifies different types of participation based on the power distribution between the haves and have-nots. At this level of participation, citizens can hear and be heard, but there is ‘no muscle’ to this exercise, i.e., their voice has a minimal role in the outcome (1969, p. 217).

Figure 1: Arnstein's Ladder of Citizen Participation



Adapted from Arnstein (1969, p. 217)

At the core of this classification is the underlying theory that participation is a continuum determined by power. I contend that there are three limitations to this approach. Firstly, Arnstein herself cautions us from avoiding any oversimplification of power as a homogeneous, isolated attribute. The model categorizes citizenry into haves and have-nots and defines *participation* as a negotiation of power between the two. It limits the perspective to see power as it is – problematic and hierarchical. This discourse presumes that the agency is not with the citizenry but with the exercise of participation itself. Such a hypothesis defeats the possibility of an emancipated and empowered consultation. Secondly, power is not only vertical but horizontally dispersed, a consideration emphasized by most of the recent empirical work on consultations. Arnstein's ladder allows no scope for such a consideration. Thirdly, this model denies the possibilities of interactions between each rung. For instance, this model cannot explain the coexistence of consultation and partnership in a community participation exercise, but it is a reality noted in most of the consultation literature. Arnstein provides a valuable lens but not one grounded on reality. There is no detailed analysis of participation as a practice: Who participates? Why do they participate? How do they participate? An absence of such a fundamental examination leaves this model far from complete.

Pateman (1970) distinguished between pseudo, partial and full participation. In pseudo participation, the leader sets up a situation to simulate a 'feeling of participation' in a group even though the outcome or decision is predetermined (1970, p. 70). Pseudo participation is a technique usually used for persuasion and not decision making. Partial participation occurs when the participation is genuine, but the group only has partial power over the outcome. While Pateman's objective was not to conceptualise consultations, she inadvertently advanced Arnstein's model. Pateman states that some forms of participation are postured, hinting at their tokenistic nature in democratic governance, but fails to clarify why that is so. As a critic (Kelly, 1971) once wrote, and I concur, "this book does not go very far into the argument". Pateman's work is helpful but not sufficient.

Wengert argued that phrases such as 'public participation' and 'citizen involved' have different meanings based on the "situations, ideology, motivations and practical orientation" in which they are used (Wengert, 1976, p. 24), a point of view shared by Rosener (1978) too. Wengert also used power as an attribute to explain participation but ensued to classify it into three aspects: seizure of power, community power and elitism. While the former looked at how much an establishment, particularly an unstructured one, changes in terms of power based on citizen involvement, the latter two focused on hierarchical power within communities. Wengert argued that power could be dispersed differently even within the same community, thereby challenging the monolithic notion of power proposed by Arnstein and Pateman. He remarked that it is difficult to avoid this problem in participant representation because the fall of one elitism is often succeeded by the rise of another. His conceptualisation of power made him conclude that participation can assume five different forms: policy, strategy, communication, conflict resolution and therapy. It is evident that from Arnstein to Wengert, the discourse has grown richer. He concluded,

*Power is the result, rather than the purpose of group behaviour; it is not the object, rather than the subject. (Wengert, 1976, p. 36)*

Shand and Arnberg's (1996) participation continuum model, which is defined based on the goals of participation, furthers Arnstein's and Pateman's model. The difference is that it departs from the discourse of power to a discourse of practice. They are more interested in why participation occurs rather than what kind of power distribution shapes the exercise. The similarities between the models are evident as both locate consultation at or close to the midpoint, denoting moderate participation and moderate power.

Figure 2: Participation Continuum by Shand-Arnberg

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The figure was sourced at Shand, D., & Arnberg, M. (1996). Background Paper. In *Responsive Government: service quality initiatives*. OECD.

(Shand & Arnberg, 1996, p. 21)

### Participation as discontinuous interaction

Thomas (1995) critiqued the previously prevalent notions that participation happens in a continuum wherein the typologies range from one extreme to another in a linear manner. He proposed a contingent view and argued that the nature of the policy problem largely determines participation and its nature. Thomas commented, “if policy problems are fundamentally different in character, then participation types too would be separate and discontinuous” (Thomas, 1995 as cited in Bishop & Davis, 2002, p. 18). Furthermore, he maintained that the type of policy problem determines two crucial decisions – who should participate and how that decision should be made. Thomas emphasized the role of government officials in shaping these decisions, thereby bringing more clarity to the who’s and what’s of participation. Based on these premises, he classified consultation into unitary and segmented. In the former, the entire public is consulted for information and acceptance. A unitary consultation allows the public to see their differences. In the latter, only sections of the public are consulted. It is done when a group of citizens uniformly oppose a policy aspect. His hypothesis was also supported by Walter et al. (2000) in their purpose-issue matrix, a subject that will be discussed later in this chapter. He concluded that participation is fundamentally a *learning process* (1995, p. 32), implying that more time and cost spent on it is more time and cost saved in implementation.

This theory of discontinuity was advanced by Bishop and others, who defined *participation* as “the expectation that citizens have a voice in policy choices” (Bishop & Davis, 2002, p. 14). They presented a model of participation as discontinuous interaction. I find this definition the most pragmatic, at least for this study, as it moves away from participation as a linear, direct product of one or two factors to something that mirrors the complicated and imperfect nature of governance and decision making.

They wrote,

*The discontinuous nature of policy problems, the influence of local history over approaches to participation, and the overlapping application of mechanisms argue for a scheme that is descriptive rather than normative.* (2002, p. 21)

Consultation, according to this definition, is not necessarily hierarchic but contextual. It can be top-down, bottom-up or can “restructure vertical relationships into horizontal ones” (Schwartz & Deruyttere, 1996, p. 6). Along the same lines, Ryfe proposed that participation is not merely a rational exercise but “an episodic, difficult and tentative process of combining cognition and culture” (Ryfe, 2005, p. 59).

In conclusion, I contrast the discourse of consultation dominant in the 20<sup>th</sup> century with that of the early 21<sup>st</sup> century. Again, the considerable but gradual shift from a focus on power to one on policy issues is visible. Reading these together, I define *consultation* as a discontinuous interaction between the government and the governed for a (pre)determined goal that is partly rational and partly driven by the cognitive heuristics of the embedded socio-political and cultural contexts. This definition is grounded on two assumptions. Firstly, as Rosener (1978) and Wengert (1976) have maintained, participation has meaning only in a context. Consultation could have different meanings in the same country but for different social development projects. It could mean different things based on the policy problem, the political system, and the social organisation of the context. It does not imply that there is no universal consensus on what consultation is but that one should be mindful of its lived reality. Secondly, the definition depends on whether consultation is a means or an end in the policy process. As was discussed in this section, consultations are often performed as a supplementary exercise to collect public input alongside other technical and expert research. In such cases, tokenism is the goal of the exercise and not a normative result. In the next section, I will deconstruct the above definition to address the puzzle of NEP’s consultative process.

## Discussing Consultations: Who, how and why?

### Why are consultations conducted?

Rosener (1978) contended that it is essential to differentiate the functions of consultations from their consequences. Whereas functions are the predetermined goals of the consultation practices, the consequences are the outcomes. In this section, I will illuminate more on the functions of consultations and illustrate how they differ for the government and the citizens.

Rosener (1978, p. 458) maintained that consultations are conducted to create “a citizenry with a democratic character”, a proposition also supported by the rest of the scholarship (Bishop & Davis, 2002; Bunea, 2017; Irvin & Stansbury, 2004; G. F. Johnson & Howsam, 2018; Mosse, 2004; Rodrigo & Amo, 2006; Schwartz & Deruyttere, 1996). As it transforms the citizenry from passive recipients to

active producers of policy, consultations play a role in social and democratic reform and addressing the democratic deficit. In other words, it strengthens cooperative relationships between the governed and the government. Thomas called this process *reinventing government* (Thomas, 1995, p. 10). In the *policyscape*, this translates to reducing inequalities between policy insiders and outsiders (Bunea, 2017; Fraussen et al., 2020).

According to Schwartz and Deruyttere (1996), consultations achieve “social cohesion” by organizing men and women to solve social problems (1996, p. 2). Mosse (2004) concurred that there are two dichotomous consultation goals– communitarian and market-related. He opined, “[It could] mean both market research and empowerment.” (2004, p. 649). Bishop and Davis concurred by citing community empowerment as an uncompromising function of consultation (Bishop & Davis, 2002, p. 15). Irvin and Stansbury (2004, p. 55) noted that “an engaged citizenry is an active citizenry”. Rodrigo and Amo (2006) claimed that the role of communities in consultations ensures the identification of non-evident policy alternatives. In economic terms, this improves the return on investment as community ownership paves the way for smoother implementation. Other central functions of consultations cited in the literature are decentralization of power, ensuring social justice, achieving efficiency, clearing policy blocks, informing, involving, and eliciting opinion and dialogue.

These functions were comprehensively summarised by Pellatt (2003) when he classified consultation goals into four:

1. Discovery: To “develop a common language” between citizens and the government (2003, p. 5)
2. Education: To discuss the policy issue and arrive at alternatives
3. Measurement: To assess the community’s perception of the issue
4. Persuasion: To encourage and gain citizen’s support for a predetermined decision

The question of why could also be interpreted from a different perspective. Why do and why should people participate? What is the motivation? Ryfe (2005, p. 57) argued that the “things that make us uncomfortable”, such as a need for accuracy, accountability, and diversity, are the most critical factors to drive consultations. According to him, citizens participate for socially and culturally situated reasons. As discussed in the previous section, consultation is not always a product of rational exchange as there is also a “cultural software” at play. He maintained that it is this cultural storytelling that motivates communities to participate in public life as it provides them with a ‘sense of self’ (2005, p. 59). A similar thesis was provided by Walter et al. (2000). They reminded us that the public could be uninterested and self-interested in consultations and need not always be serving a public goal. They also

distinguished democratic decision-making from rational decision-making, arguing that the former is driven by a pursuit of participation and the latter by a pursuit of efficiency. Unfortunately, empirical data substantiating these nuances, especially from a participant's perspective, is sparse.

In summary, I reason that there is a consensus in the scholarship regarding the functions of consultations. Functions, in this discussion, are a theoretical concept and are different from consequences which is a more practical discourse. According to the above literature, functions can be broadly classified into two – functions as stated by the government and functions according to the governed. Some functions are located at the intersection of these two broad categories. Participants usually participate because it allows them to speak, express and be heard. In addition, it is an opportunity to learn more about the policy and contribute to the policy problems around them. It provides them with a sense of ownership in their local governance systems. The government or agencies conducting the consultations aim to discover the policy problem, educate the public, measure the public sensibilities, persuade the public, ensure public accountability, and build a cooperative relationship with them. Furthermore, these functions could be driven by intrinsic or extrinsic motivations. However, these nuances can only be observed, learned, and measured within a specific social and cultural context.

### Who participates in and who conducts consultations?

The nature, number and extent of participation is determined by its functions. Schwartz and Deruyttere (1996) highlighted the importance of stakeholder analysis in community consultation. They suggested looking at multiple factors such as class, gender, ethnicity, race, age and occupation. More importantly, they suggested considering the power relations within and between these categories. They proposed a political ecological analysis and socio-cultural analysis to achieve a coherent understanding of who needs to be consulted. They remarked,

*Without sociocultural analysis community consultation is apt to be mere rhetoric, and without community consultation, more narrowly technocratic, sectoral development projects are apt to be inefficient, inequitable, not cost-beneficial and short-lived.* (Schwartz & Deruyttere, 1996, p. 12)

The stakeholders in any participation exercise can be categorised into two: those who consults and those who are consulted. For the scope of this study, we call the first group as policymakers and the other as participants. This is determined by geographical, political, cultural specificities in conjunction with factors such as the nature of policy problem, the urgency of policy solution, the philosophies, and principles of the political leadership. For instance, Macintosh argued that who participates depends on

at what stage the participation occurs. According to her, the five stages of policy cycle are agenda setting, analysis, creating the policy, implementing, and monitoring it (Macintosh, 2004).

Participants are often classified by the nature of their participation. In the previous section, we discussed the literature on active citizenry. There is a likelihood that the public actively participates and deliberately own the policymaking process. Alternatively, as Ryfe argued, people could be ‘cognitive misers’ (Ryfe, 2005, p. 51). He problematised the assumption that the public intends to participate in consultative process. According to him, the public participation process is usually characterized by a ‘pass the buck’ attitude. The cost of participation is borne by some while the entire community benefits from the decision. The decision to participate is hence a strategic one. From a policymaker’s perspective, some forms of participation recruitment can be advantageous than others in terms of cost, homogeneity, and convenience. It therefore merits attention in the evaluation framework. This postulation was previously echoed by Thomas in 1995. He submitted that participation is essentially imperfect and often unrepresentative. However, in the case where it is not both, participants are often unwilling due to multiple reasons. Political participation is far from convenient, and actors invest in it only if they foresee a direct benefit. Thomas also claimed that as the need for representativeness increases, involvement grows fragmented therefore raising the cost. Hence, he proposed selecting only ‘relevant publics’ (Thomas, 1995, p. 55), defined and recruited in a bottom-up manner. He also urged the importance of not viewing actors in isolation but appreciating their social and political embeddedness.

Alternatively, participants are measured by the scale of participation. Arnstein reported,

*People [could also be] primarily perceived as statistical abstractions, and participation is measured by how many come to meetings, take brochures home, or answer a questionnaire. What citizens achieve in all this activity is that they have “participated in participation.” And what powerholders achieve is the evidence that they have gone through the required motions of involving “those people.”* (Arnstein, 1969, p. 219)

The scale of participation is often measured by the following sub questions: how many were invited, how many did respond, how many did attend, how many did participate, and how many followed up. These sub questions are themselves depended on the predetermined objectives of consultation and are crucial to the evaluation framework.

I broadly correspond with Macintosh (2004) , who suggested the following critical factors while discussing e-participation: scale, diversity, accessibility, inclusivity, and information symmetry. I also find Thomas’s and Yang and Pandey’s proposition of the relevant public useful. Yang and Pandey

argued that state does not seek “an absolute representative group of “all” residents, but a representative group of “relevant” public.” (2011, p. 884) We need to discern and study the question of who because of three reasons. Firstly, it is integral in determining the process, content, conduct, and analysis of participation. Secondly, it is vital to the adoption of citizen voice into policy. Finally, it allows us to characterize who holds accountability and responsibility for major policy decisions.

### How are consultations conducted?

There is a general agreement in the consultation canon that the *how* follows the *who*. That is to say, the techniques, tools, systems, and methods of consultation are determined by the predetermined objectives and the participants. Therefore, all the factors we discussed previously such as the nature of policy problem, stages of policy cycle influences how the consultation is conducted. There is however a popular notion that the earlier the consultations are conducted, the better it is. This is because of two reasons: Firstly, it helps the state build more credibility on the issue. Secondly, it allows more room for discussion and hence constructive insights into the policy. A last-minute consultation has more probability of being perceived as tokenistic.

Rosener(1978) argued that the cost of participation determines the mode of participation. The costs are further determined by the functions and the extent of participation. Along the same lines, Renn and others (1993) maintained that every actor has a vital role to play in the conduct of consultation and hence proposed a three-step procedure involving stakeholders, experts, and citizens. Similarly, Fraussen et al (2020) argued that the type of consultation approach influences stakeholder diversity. According to the authors, ‘consultation approach’ refers to the ‘use of different consultation tools’ (2020, p. 475). They classified these approaches as open, closed and hybrid based and concluded in the study that hybrid models of consultation attract more stakeholders. They added,

*“Although a limited set of policy issues attract a large number of stakeholders, the majority of issues are characterized by the engagement of a rather limited amount of stakeholders.”* (Fraussen et al., 2020, p. 483)

The consultation approach can further reinforce or correct the status quo. For instance, closed meetings have more chances of being dominated by business and elite presence as compared to open models which are often more diverse and democratic. Thomas (1995) had previously concluded that public meetings are the most unrepresentative because of their scale. He emphasized on the role of advertisements to ensure participation from a significant cross-section of society. He maintained that

representativeness should not only be ensured in selection of participation but also in articulation and closure of the policy issue during the consultation approach (1995, p. 116).

The scholarship agrees that there is a clear lack of bureaucratic guidelines on how to implement and combine these consultation approaches. Though, this stands as an impediment to solving the puzzle of public involvement, the scarce literature contributes to the evaluation framework in subtle but meaningful ways.

### Measuring Consultations: What is a good and meaningful consultation?

*The idea of citizen participation is a little like eating spinach: no one is against it in principle because it is good for you. Participation of the governed in their government is, in theory, the cornerstone of democracy - a revered idea that is vigorously applauded by virtually everyone. (Arnstein, 1969, p. 216)*

Scholars have continually argued that participation is normatively good (Bishop & Davis, 2002; Thomas, 1995). Nevertheless, there is little clarity on what *good* means and what makes good consultations. For example, is a good consultation one that is more in number (Rosener, 1978)? If not, is it judged based on its quality? Alternatively, are there factors besides these factors? In this section, I argue that such a measurement depends on the objectives, outcomes, actors, and techniques involved in such an exercise.

In this section, I make two arguments. One, the measurement depends on the perspective. Whom you measure for is as important a consideration as how you measure. Second, I differentiate between the measurement of the process and the outcome. The definitions and puzzles of public involvement in the previous sections will be used here substantially for identifying relevant factors and proposing a contextual normative framework for measuring NEP consultations.

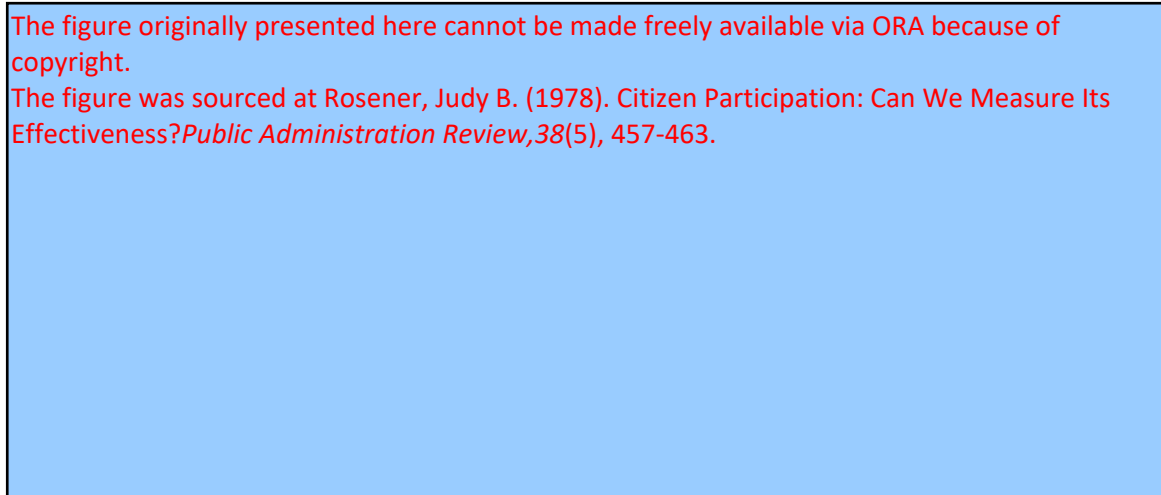
Renn et al. (2013) maintained that the evaluation of participation models depends on whose perspective you are evaluating. Thus, they divided the evaluation theories into participants' view and administrators' view (2013, pp. 5–6). At the same time, they also problematised these 'subject-centred evaluations' (2013, p. 7) as responsible for creating a zero-sum game where one party always leaves the table in disagreement. According to them, this phenomenon turned the focus from macro to micro-social theories emphasising individuals and interactions where evaluations were centred on shared interests. I use this shifted focus to develop my framework as its more relevant to the research question and respects the underlying philosophies of this study. Therefore, I do not provide the differentiation

of an administrator-participant view in the upcoming sections. Instead, I aspire to capture the principles of a good consultation using a shared lens of all stakeholders involved.

### Measuring the functions

In this section, I will discuss consultation evaluation models that use consultation functions as the primary unit of measurement. For example, Rosener (1978) developed the 'Participation Evaluation Matrix', which helped classify participation into four quadrants based on two variables: knowledge of a cause/effect relationship between the participation program and the pre-set goals and an agreement on these goals (Figure 3).

Figure 3: Participation Evaluation Matrix by Rosener



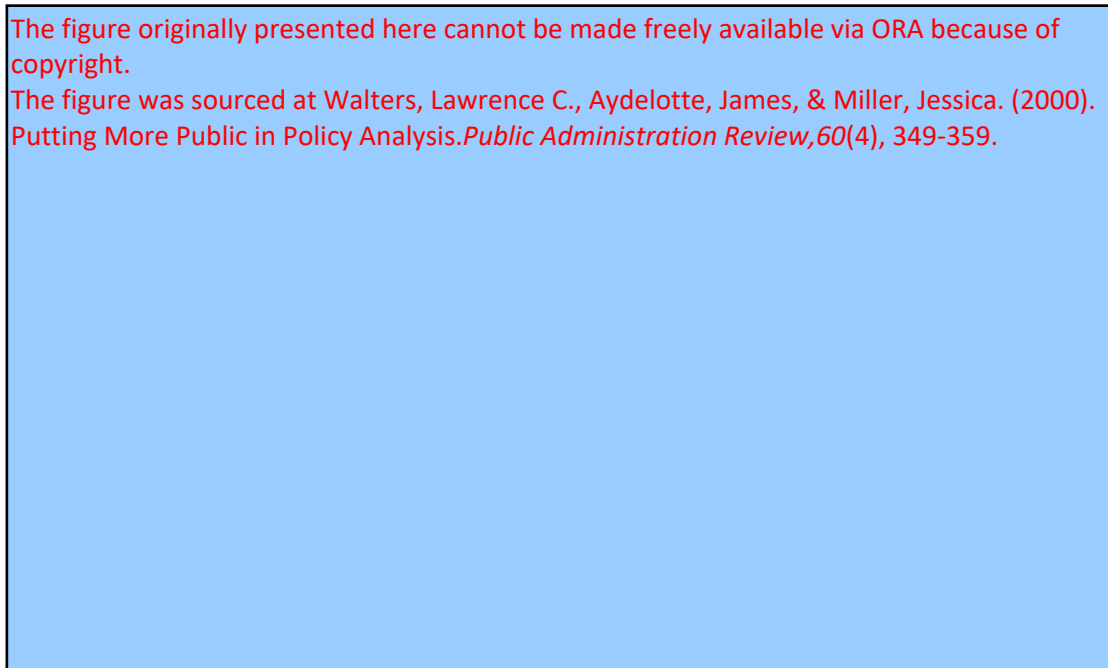
Adapted from Rosener (1978, p. 459)

According to her, most participation programs occur in quadrant IV, although quadrant I is the preferred site. She argued that participation is just a "number game" (Rosener, 1978, p. 460) without a predetermined objective. She maintained that a measurement in terms of the number of people, kinds of people, frequency of involvement and duration of involvement is accurate when participation is an end in itself (Rosener, 1978, p. 459). If participation is measured as a means to an end, it should be measured based on its predefined objectives and capability to achieve them.

Following this thread, Walters et al. (2000) maintained that purpose is critical in defining the success of consultations. Concurring with James Creighton's thesis (Herr, 1981), they posited that more participation is needed for acceptance and less for ensuring quality. They further developed a purpose-

issue matrix where they argued that we could classify consultation forms and evaluate them based on two variables: the purpose of participation and the nature of the issue. As discussed in the earlier sections, the purpose is divided into discovery, education, persuasion, measurement, and legitimacy. The nature of policy issues could range from ill-structured to well-structured. The following table demonstrates the different consultation approaches based on these parameters. The purpose-issue matrix provided two conclusions. Firstly, the need for more and diverse participation approaches increases as we tend to more ill-structured policy issues. Secondly, hybrid and closed approaches are suitable as the purpose moves downwards. The scale of participation also increases as we move down the matrix. Walter et al. concludes that “public input has its place in policy analysis” (2000, p. 357). However, which *place* is defined by the objective of consultation and the policy issue it addresses.

Figure 4: Purpose-Issue Matrix



Adapted from Walters et al. (2000, p. 356)

### Measuring the Process

Consultations can also be evaluated based on their process variables. In this section, I define a few variables: alignment, motivations, and participant characteristics.

Pellatt (2003) stated, “When the community believes that a consultation program is successful, the techniques of consultation match the purpose of the program, reach the interested stakeholders and resulted in a clear linkage between the public participation process and the decision-making process”

(2003, p. 5). This hypothesis has been prominent since the late 20<sup>th</sup> century. It envisioned that a good consultation establishes a good linkage between the why, who and how. Similarly, Ryfe (2005) argued that the motivations for participation play a crucial role in its quality. He argued that consultations should be evaluated as practised and not based on their aspirations. He indicated that a good way to know if they have been successful is to look at how the participants have been motivated to overcome their “historical, structural, and psychological impediments to intentional reflection” (2005, p. 56) to achieve the common goal.

Using a public management perspective, Yang and Pandey (2011) tested the correlation between four variables and the quality of citizen participation measured from a manager’s point of view. The four variables were policy environment, characteristics of the target organization, characteristics of participants, and involvement mechanisms. The study concluded that participant characteristics are the most important explanatory variable in determining the quality of consultations. I maintain that even though these are valuable benchmarks, they are either challenging to measure, as Irvine and others (Irvin & Stansbury, 2004) had noted or are too subject-centred to be conclusive.

## Summary

This section will summarise more recent frameworks of participation evaluation and conclude the previous discussions to suggest relevant factors and propose a contextual framework for NEP consultations.

Johnson and Howsam (2018) argued that the only collaborative consultation is an empowered consultation, where the participant can make or influence decisions meaningfully. Like Rosener’s model, they differentiated between consultation as a means and an end and developed the *ladder of forms* and the *ladder of ends* to rank them. While the first ranked the types of consultations empirically, the latter ranked the goals of consultations normatively. Additionally, they reintroduced the conceptualisation of participation as a continuum, thereby suggesting a unique method for categorising and measuring consultation forms. Finally, they concluded that an empowered consultation improves both the ends and the means (2018, p. 266).

As valuable as these frameworks are, they do not establish a holistic and conclusive blueprint to measure consultation. Instead, they all converge on one universal thesis. As Ryfe stated,

*There is no such thing as a one-size-fits-all public participation. But there are critical issues that can make the difference between a successful and an unsuccessful program. (Ryfe, 2005, p. 2)*

Yang and Pandey (2011) echoed similar beliefs and concluded that participation is *policy contingent*, confirming decades of aligned argumentation. At the same time, scholars like Irvin & Stansbury (2004) argued that the discussion should be not whether consultation is good or not but what forms are best. They diverted the attention from *how to measure participation* to *whether to measure participation* at all. They proposed a cost-benefit analysis of participation exercises, both from the perspective of the citizen participant and the government, to arrive at some ideal and non-ideal conditions of participation. They attested that it would be challenging to measure consultation from an outcome point of view because these traits are often too intangible to measure and, if measurable, take too long to show (2004, p. 58).

Scholars like Fraussen et al. (2020) urged the readers to look for values of consultation that are beyond the realms of public policy and are intrinsic. They concurred with Wengert (1976, p. 24), who shed light on participation’s innate ability to redefine power structures, seek information all in a ‘more responsive public service’.

I use the above-discussed theories and frameworks to suggest the following outline and attributes to evaluate NEP’s consultations. I maintain that some or a combination of these criteria are useful for evaluating NEP consultations based on the objective of measurement.

Table 2: A framework for measuring good consultation

Perspective	WHY	WHO	HOW
Participants Policymakers	Democratic reform	Alignment between why, who	Alignment between why, who, how
	Social cohesion	Diversity	Nature of Policy Problem
	Market research	Power distribution	Stage of policy cycle
	Community empowerment /Diversity	Scale	Participation costs
Intrinsic Value Extrinsic value	Economic returns	Time indicators: urgency, policy cycle	Power structures
	Decentralization on power	Scale	Reciprocity
	Social justice	Accessibility	Rational
	Policy efficiency	Inclusivity	Cost effective
	Policy ownership	Information Symmetry	Transparency

Theory	Discovery	Relevance	Access to information
Practice	Education	Convenience	
	Persuasion		
	Measurement		
	Accountability		
	Social and cultural motivations		
	Legitimacy		

## CHAPTER 3: METHODOLOGY

This chapter will focus primarily on the research design and the methods used. At first, I will delineate the theoretical foundations of each method and clarify how the method will contribute to the research question. Then, I will elucidate the research process by explaining the journey from participant recruitment to data collection. It will be followed by a discussion of the research paradigms that guided my methodological choices and acumen. Finally, a synopsis of ethical considerations and methodological limitations will conclude this chapter.

### Research paradigm

This section will elucidate my ontological, epistemological, and methodological positioning and attempts to explain the philosophies that guided the execution of this research. Due to the limited scope of this written work, this section will not extrapolate on the *paradigm wars* (Gage, 1989) in the space of education research. However, as the research question is about measurement, I will also attempt to explain why a positivist methodology was not considered suitable.

I assume a relativist lens in approaching this question. According to Lincoln and Guba (2005, p. 193), relativism posits that there are many “local and specific co-constructed realities”. I maintain that one’s worldview is relative to one’s social, political, and economic positioning. The realities can then assume different meanings based on who is studying them. Denzin and Lincoln said, “There are no objective observations, only observations socially situated in the worlds of—and between—the observer and the observed” (Norman K. Denzin & Yvonna S. Lincoln, 2005, p. 29). I claim that I create knowledge only within the limited boundaries of my social, political, and cultural situatedness. It is not to say that there is no objective truth. In the context of my specific research question, I believe there is an objective definition of good consultations and that it can be objectively measured. However, I hold that one can only reach the objective truth through competing and contradicting subjective *meanings*. This intersubjectivity is achieved by interaction and negotiation between the subject and the object. Social constructionists study this interaction to learn about the relative ontologies. Using a constructionist enquiry, I hope to “make strange patterns familiar, and familiar patterns strange” (Bray et al., 2014, p. 430).

Although the research question is fundamentally a measurement question, a strictly positivist approach was not used for two reasons. One, NEP being a relatively new policy, limited the availability and accessibility of quantitative data and interpretations of that data. Additionally, the primary objective

of the research discussed in the introduction chapter is to evaluate the quality of consultations. Although no evaluation is possible without measurement, it is an integral part of the enquiry, but it is not the goal. Thirdly, I wanted to mitigate the *crisis of representation* and *crisis of authority* that are often observed in positivist studies. As Guba and others (2005, p. 210) noted, “[such studies] may lead us to believe the world is rather simpler than it is, and they may reinscribe enduring forms of historical oppression”.

I have taken inspiration from Patric White (2013) in his suggestion to actively and consistently maintain a curiosity-driven research approach. I thus claim that this research is exploratory. The goal is not to explain or test any hypothesis but rather to build one. My discomfort in assuming mono-methods identities shall become more apparent in my analysis section, where quantitative elements are increasingly used. I firmly believe such monolithic identities could hamper the purpose of education research and assert that traditions should only guide our research and not determine them. As Geertz said, there is an inevitable blurring of genres in social sciences where “Something is happening to the way we think about the way we think” (Geertz, 1980, p. 166). Similarly, Guba et al. remarked,

Here is great potential for interweaving of viewpoints, for the incorporation of multiple perspectives, and for borrowing, or bricolage, where borrowing seems useful, richness-enhancing, or theoretically heuristic. (Guba & Lincoln, 2005, p. 113)

I concur with Geertz and others who argued that a philosophical, conceptual, or methodological blurring of genres are inevitable in research for practice. In summary, although the study is conducted from a relativist lens through constructionist methods, I acknowledge having used the freedom to borrow from and use from other tradition if it served the research question.

### Research Design: Methods, theories and motives

I have used a qualitative methodology comprised of semi-structured online elite interviews and policy document analysis to answer my research questions. In this section, I will delineate the theoretical foundations of these methods and describe how they were used for data collection and analysis. The interviews answered the first research question, and the second one was answered prominently by documentary analysis.

The literature review played a crucial role in deciding and applying the methods. It was clear at the first phase of the review itself that the question should be deciphered from the perspective of different stakeholders in the policymaking process. The common themes in the systematized review and

literature review indicated the need to maintain a systemic lens throughout the study. It was essential to draw the relations between the different puzzles of public involvement. Additionally, as the objective was to evaluate a process and its quality, it was understood that engagement with the field site could contribute to the overall project. Ethnographic research was, however, not possible due to the logistical challenges of travelling. Interviews were deemed to be the feasible alternative. Online interviews were finally selected because it was confirmed to be convenient for both the researcher and the participants due to the widespread availability of real-time audio and video communication services. Although the initial research design had experts and non-experts as participants, I could only interview the first group as the project progressed due to a lack of response from Group 2 candidates. Hence, this section will not cover the theoretical background of online interviews as their relevance in this study is limited. It was also decided during the research design that the methods will be adapted to the changing needs of the project. For instance, although the decision was to only communicate through official mail IDs, personal IDs were eventually used in some cases when it was insisted by the participants themselves for confidentiality purposes. Document analysis was initially considered a complementary tool to bridge the potential inadequacies of interviews. Later, as its inherent value in the research design became more explicit, it was incorporated as a supplementary method.

## Policy document analysis

### *Introduction*

In this section, I will clarify the epistemological assumptions governing not only the choice but the execution of policy document analysis and briefly discuss four questions: Why did I choose policy document analysis? How did I define and undertake the method? How does it situate itself in the bigger research design? What are the challenges and benefits of this method? I do not claim to be value-free in this project. Rather I agree with Moe and Karppinen (2012) that policy research is a normative exercise and that we are far from ‘neutral observers’ (2012, p. 8) in it.

The literature on policy document analysis is scarce and does not explain the epistemological and ontological philosophies affecting the method. It is a commonly used method in disciplines such as Literature, Media Studies, and History but not so much in policy studies or educational research. However, all scholarship confirms that no matter where it is used, documents are a rich source of empirical data particularly in qualitative studies (Bowen, 2009). The important work that I referred to in this regard (Bowen, 2009; Kutsyuruba, 2017; Moe & Karppinen, 2012; Morgan, 2022; Rapley, 2018) emphasized the ability of documents to contextualize data from other sources such as interviews or case studies. The debate on the subjective-objective nature of documents also seemed relevant to engage,

especially to my research question as especially online elite interviews came with their own considerable limitations.

I began the research with the assumption that documents are stable, non-reactive, natural, and objective sources of data. However, this perception changed in the pursuit of this study, and I will explicate this further in this section. Yet another attractive feature of documents was that they were free from a lot of ethical concerns (Merriam & Tisdell, 2016 as cited in Morgan, 2022, p. 69). Using documents also appeared to be ideal because the policy process was long, complicated, and lasted for five years starting from 2015 to 2020. It was crucial to track developments accurately, compare the changes from one policy release to another and capture how the policy position changed with Governments, committees, and time. Every new document summarized the development of the policy so far and this provided a useful lens to understand the tentative and ongoing nature of consultations.

#### What are documents?

David Bowen defined document analysis as “a systematic procedure for reviewing or evaluating documents - both printed and electronic material”(2009, p. 27). The literature on documentary analysis concertedly recognises that the process could differ based on the research questions, the objectives of the method and the role of the method in the larger research design. For the scope of this discussion, I outline document analysis as not exhaustive of but including four key steps: finding data, selecting data, appraising, and synthesizing data. To begin with, a definition of documents is required. David Altheide defines document as any “symbolic representation that can be recorded or retrieved for analysis” (1996, p. 2). This can be written, oral, verbal, visual, pictorial, digital, multimedia and like Merriam (1988) said is “limited only by one’s imagination and industriousness”. This definition is so broad that I find Bryman’s (2001, p. 370) position that documents are “*out there* waiting to be assembled and analysed” a very useful entry point to at least attempt a conceptualization of documents and their analyses. As a researcher, I was open to all texts that had potential use to this research question. However, I maintain that this definition is conditional on two grounds.

First, I considered documents that are only primary sources for this investigation. Moe and Karppinen define primary documents as the “actual objects of the study” and secondary documents as “records or accounts of primary documents” (Moe & Karppinen, 2012, p. 4). This distinguishes documents released by the Government from more interpretive and analytical accounts by non-State actors including academics, media, and independent institutions. As the study was extensively online,

documents were regarded as 'field notes' (Turner, 1983, p. 342), and were perceived them communicating on or behalf of the actors in the policy design process.

Secondly, I posit that documents can and should be used as both sources and texts. Moe and Karppinen distinguish between document as a source and document as a text or topic of study (2012, p. 3). In the former, documents are treated as objective and non-reactive sources that outline the facts in a process. In the latter, they are treated as social products that have intrinsic value. Like Moe and Karppinen(2012, p. 15) maintained, "We could profit from striving to cross these boundaries to analyze academic debate, policy documents and newspaper discourses, not as autonomous spheres but as inter-linked debates."

### *Why Document Analysis?*

I find documents valuable in two ways. Firstly, I view all documents as evidence of a social fact (Atkinson and Coffey,1997) and as denotive of the social, political environment that created them. This is what Rapley (2018, p. 124) referred to as the 'orphaned texts', texts of which "the social life itself is the object of your analysis". From this viewpoint, it is valuable to analyze what the documents state and how it states it. This is evaluated by content analysis. Secondly, I view all documents as political and as having a value of their own. As Moe & Karppinen (2012, p. 15) said, documents originated from a "real world of political production" and are thus influenced by it. Here the attention is on what is not said and not on what is said. This is performed by a reflexive thematic analysis and the attempt is to read between the lines and capture biases, inaccuracies, contradictions, and incompleteness in the texts while also being conscientious of one's own epistemological, ontological and axiological positionality. I concur with Altheide (D. Altheide, 1996, p. 8) who said,

*Research is a social activity, and methods and data are always closely related to theoretical ideas about what is important. In practice, the researcher thus always interacts with documentary materials to place specific statement in a context for analysis.*

### *How were documents selected and analysed?*

It is also important to clarify that I analyzed only documents on public domain, chiefly due to two reasons. Firstly, they allowed me to capture the voice of the Government in their role as objective representations of the Government's position on policy affairs. Secondly, they were easily accessible and was free from ethical concerns making the data collection process smooth and effective. It was a hassle-free, inexpensive, and feasible means to redress the other limitations of the study caused by logistical constraints. I studied the intention of the documents to qualify the documents as suitable for study (Morgan, 2022). I asked the following questions for this categorisation. What is the evidence that

this document is meant to be used by public? More importantly, what is the evidence that it is not meant for public use? Simultaneously, the documents were also checked for their authenticity, credibility, representativeness and meaning (Flick, 2019).

The documents were chosen first by purposive sampling (Bowen, 2009) directed by the keywords in the research question. Eventually, as central categories and themes were being constructed, I adopted a theoretical sampling approach until reaching a “point of redundancy” or theoretical saturation (Morgan, 2022, p. 72). After selection, the documents were skimmed through and read more attentively. It was clear that there were some recurring patterns in the texts, both in terms of their latent and explicit meanings. Kandel’s discussion of ‘hidden meanings’, ‘real meanings’, and ‘essence’ proved useful in making this differentiation (Kandel, 1933, p. xix). When analysing the documents thematically, “researcher subjectivity [was considered as] a resource than a problem” (2022, p. 73). The coding was seen as an organic, iterative, and growing process, going back and forth between documents, their description, and their interpretation. The documents were often read alongside the interview transcripts to not only identify these patterns but also to gauge their relevance. This is not to say that the policy documents were considered the only sites of examination (Moe & Karppinen, 2012). They were complementary to online interviews. After a preliminary skimming and scanning, the texts were thoroughly read and analysed on NVivo. I first did open coding to understand the general discussions. It was followed by line-by-line coding to focus on more nuanced themes and categories. I maintain that the themes were not emerging but actively and deliberately constructed based on the epistemological and axiological foundations (Braun et al., 2019). After the coding, other functions such as text search and word count query were used to answer specific questions from the twenty-three documents.

## Elite Interviews

### *Introduction*

*Rightly or wrongly, we believed that we had to create sources for research, not merely locate them.*  
(McPherson & Raab, 1988, p. 56)

In this section, I will discuss the methods and practice of conducting online elite interviews. Like previous section, I will also elucidate on how the method is situated in the overall research framework.

Any policy consultation is indispensably a part of the broader policymaking process and is hence a product of the decisions and actions of the policy elite. The intent of “researching up” (Walford, 1994) was to learn and critically engage with the *assumptive worlds* of the policy elite (McPherson & Raab, 1988, p. 55). Young and Mills first used this phrase in 1978 to denote “the intermingled beliefs,

perceptions, evaluations and intentions that comprise policy-makers' understanding of the policy milieu" (Young, 1977, p. 3). Who are these policymakers? How do they articulate their work in policy design? What are their inherent values, beliefs and assumptions and how does this reflect in the policy? I used elite interviews as an extension of this "play of power" (Walford, 1994) that colors the political world of policymaking.

### *Rationale*

The choice of elite interviews was motivated by four reasons. Firstly, interviewing the policymakers and the committee themselves provided rare insights into the design process which was otherwise not available in any public domain including the policy documents (Fitz & Halpin, 1994, p. 33). The written documents on the Government web site did not illuminate "the dialectic of belief and action" (McPherson & Raab, 1988, p. 56). It was also vital to know and analyse the policy in a more systemic sense which could have only been done by capturing the voice of the individuals in the policy ecosystem. Secondly, it helped build a sense of network of individuals and agencies involved in the policy-making apparatus. Who are these policymakers and what are their ontologies? Why did they make certain decisions and not others? What were their own personal and professional goals? Thirdly, it was an ideal site to clarify the practice of consultations. In so many ways, the interview provided humaneness to the otherwise abstract narrative provided by the documents. What was the lived experience like? Why did we fail or succeed? These were questions that interviews allowed me to explore. Finally, and most importantly, it was imperative to listen to the stories of the powerful. Especially when consultation's own conceptualization was heavily founded on theories of power and participation, this examination seemed inevitable.

### *How were the interview data collected and analysed?*

The interviews were semi-structured in nature and was conducted on convenient online platforms, mostly Microsoft Teams. As the interviews were entirely elite in nature, access to technology was not identified as a challenge. The guiding questions were prepared based on the literature review and were extensions but variations of the research questions (Flick, 2019). The documents were used as references in the interviews to ground the conversation on facts. An average interview lasted eighty minutes and any follow-up data were collected by asynchronous mail communication or online meeting based on the convenience of the participant.

An outline of the interview questions was shared with the participants beforehand. The interviews were recorded for transcription and data analysis purposes. The interviews often began with a brief

introduction and context of the study. The questions were mainly open-ended. Cues and clarifying questions were added in between to guide the conversation. I borrowed from Maanen (1988) and maintained the position that “there is no perfect theory nor perfect report about it” (1988, p. 401). Although interviews were transcribed verbatim, the assumption was to reflexively and constantly engage with the text to construct the most possible truth. Participants were also helpful in this endeavour as they were willing to participate in follow-up questions and engagements.

### RESEARCH PROCESS: *From Finding participants to Finding Data*

In this section, I will discuss the process of participant recruitment, document selection, data collection and analysis that was employed in the study. I will end the section with a reflection on my role as researcher and the ethical deliberations that guided the study.

#### Data Collection: Talking to people and talking to texts

According to the initial research design, three groups of stakeholders were proposed to be interviewed – policymakers (Group 1), Community members (Group 2) and journalists or subject-matter experts (Group 3). The goal was to capture diverse perspectives and triangulate data. The participants were recruited through snowball sampling. Research advertisements were posted on my personal LinkedIn, Twitter, and Facebook profiles to tap the extended formal network. Additionally, advertisement messages were also shared with my previous employer to tap my immediate network. The responses to these advertisements were as follows

Table 3: Responses to social media advertisements, 2.05.2022

Serial No	Platform	Total Engagements and responses received (Likes, Shares, Comments and Direct messages)
1	LinkedIn	39
2	Twitter	8
3	Facebook	18
4	Direct Messaging	7

I secured responses from two candidates for Group 1 interviews from this exercise which gave me the initial entry into the network of stakeholders. Subsequently, a copy of participant information sheet was sent to these candidates on their available contact details. One of them assumed the role of a gatekeeper in the study. In the second phase of the recruitment, I used Government websites and

sources to find mail IDs of officials working in Karnataka school education and higher education departments<sup>2</sup>. The objective here was to reach state-appointed state-level officials who were part of the consultative processes in any capacity. This was also one indirect way of reaching the community or Group 2 participants. Then, I sent the research advertisements with a copy of participant information sheet to relevant officials. The responses to the above recruitment effort were as follows:

Table 4: Responses to group 1 and group 2 e-mail recruitments

Serial No	Stakeholder	Number of candidates approached	Number of candidates responded
1	Nodal Officers	2	0
2	BEO	203	0
3	DDPI	34	0
4	CPI	38	0

With respect to Group 3, I approached academics and journalists who had been extensively or fragmentedly studying consultations of India's NEP 2020. I used my initial systematized and literature review to obtain the details of the relevant individuals in this space. As the academic or subject-matter expertise in the field of consultation was scarce, the process included recruiting from States other than Karnataka. 2 journalists and 2 subject-matter experts were contacted for this purpose of which 1 of each responded.

At the time of data collection, I had two candidates in Group 1 and 1 candidate in Group 2 category to begin the interviews. The Group 1 leads further led me to 2 other policymaker who also ultimately participated in the study. The following interviews eventually took place.

Table 5: Details of elite interviews

Participant Number	Date of Interview	Duration of interview	Role of participant	Nature of interview	Was there a follow-up?	Mode of follow up
1	27/05/2022	77 minutes	Policymaker	Elite	Yes	Online Interview
2	25/06/2022	44 minutes	Policymaker	Elite	Yes	E-Mail

<sup>2</sup> The sources of Government mail ID's: [Higher Education](#), [School Education](#)

3	20/08/2022	53 minutes	Policymaker	Elite	No	NA
4	25/06/2022	53 minutes	Subject-matter expert	Elite	No	NA

Both the interview and the policy document analysis complemented each other as research methods. I started with only three main policy documents – Document 1, 2 and 7. This list expanded with the interviews as the participants referred to further sources in their conversations. The entire list of documents used in the study for analysis are as follows:

Table 6: List of policy documents

S.No.	Document Number	Document Name (Source)
1	Doc 01	NEP 2020
2	Doc 02	Draft NEP 2019 full document
3	Doc 03	Draft NEP 2016 "full document
4	Doc 04	Draft NEP 2016 Annexure
5	Doc 05	Summary Record March 2015 (MHRD)
6	Doc 06	Summary Record September 2019 (MHRD)
7	Doc 07	Manual for Grassroot Consultations (MHRD)
8	Doc 08	Press Releases (PIB)
9	Doc 09	NEP Consultation workflow (MHRD)
10	Doc 10	NEP Consultation Awareness PPT (MHRD)
11	Doc 11	Framework for formulating NEP (MHRD)
12	Doc 12	Draft NEP 2019 PPT (MHRD)

13	Doc 13 – Doc 24	Lok Sabha Starred Questions where NEP/Consultations/both were discussed
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Similarly, the scale and scope of interviews were also positively influenced by the reading and analysis of the policy documents. Often, the Group 1 participants had their responses prepared and it felt as if they were reading out the policy document itself. They engaged critically with the questions and discussion only in rare instances and this impeded the rigor of the interviews. The information in the documents would be cited during the interviews, allowing it to be specific and precise. These impromptu questions provided the participants a frame of reference and encouraged them to share their views more candidly.

In summary, I believe combining both interviews and document analysis helped maintain a good balance of objectivity and subjectivity in data. They not only helped triangulate the data but also enriched and substantiate it by one informing the other in a constant interaction.

### Rigour, Reflexivity, and the role of the researcher

According to Lincoln and Guba (1985), the four criteria of measuring rigour in qualitative research are credibility, transferability, dependability, confirmability. In addition, I used Tracy’s conception of rigour as measured through the lens of theory, data, sample, context, and process. Apart from these tenets, I was also inspired by Gutiérrez & Penuel (2014) who argued that the rigour of a study can be measured by its relevance to practice. I maintain that rigor must be ensured throughout the research by a meticulous process of screening and appraisal. I used the CASP qualitative checklist (Critical Appraisal Skills & Programme, 2018) to ensure that the critical questions regarding the quality of the research were considered consciously and extensively. As a researcher, I emphasized on two elements to ensure the rigour of this study – transparency and relevance. Firstly, I ensured to record every step of the research and especially its limitations as clearly as possible. Secondly, as the study is heavily inspired by a curiosity and purpose driven approach, it was important to reflect on and articulate the relevance of the study in as many instances as possible. I also claim that adopting a reflexive approach was essential to realise these goals.

Lincoln and Guba defined reflexivity as the “conscious experiencing of the self as both inquirer and respondent, as teacher and learner, as the one coming to know the self within the processes of research itself” (Guba & Lincoln, 2005, p. 183). As discussed in the earlier sections, reflexivity was at the core of this project, both methodologically and philosophically. As policy is indispensably entangled with

politics, I was conscious about my biography as a researcher and how that will influence the research practice.

Reinharz (1997) delineated three kinds of self of the researcher as “research-based selves, brought selves and situationally created selves” (p. 5). I reflected on my fluid research selves in the two ways. Firstly, I maintained a research diary from the inception of the research. I recorded my weekly and monthly research activities in it and allotted a section for reflecting on my experiences conducting interviews and document analysis. In addition, I also used online platforms like Twitter, WordPress to document these reflections. Secondly, memos and annotations in NVivo were actively used to record reflections on the transcriptions of interviews and document analysis. One of the notes read,

*I cannot help but notice how differently I interact with each participant. Even at the stage of participant recruitment, I double-check my mail drafts thrice for elite candidates and once for others. I address some participants as sir/mam and others by their name. I observe similar patterns from the participants. Some interviews and mail exchanges feel more like a monologue than a dialogue. Subtle forms of discrimination find its way into the research despite of the work done to resist it.*

Secondly, I reflected on my research with others. Sharing my work with friends and family was helpful to capture and critically examine my own value laden assumptions and beliefs. Their limited but objective participation enabled me to see the aspects of the research that I had intentionally or unintentionally discounted.

What Reinharz pronounced when she said “[we not only] *bring* the self to the field .... [but also] *create* the self in the field” (1997, p. 3) echoes with me significantly. I grew as a researcher actively and exponentially in this process as I learned better practices to not only conduct the research rigorously and ethically but with uncompromising integrity. I was mindful of my value positioned role and continually and critically challenged my impact on the research.

## Conclusion: Ethical considerations, and Limitations

This study was undertaken by following the British Educational Research Association Ethical Guidelines for Educational Research. The ethical guidelines by the University of Oxford’s Central University Research Ethics Committee (CUREC) were followed.

I was convinced by both a deontological view of ethics which argued for a universalizable prescription of values and to a contextual definition of ethics which posited that every research is affected by its unique and situated ethical issues (Cohen et al., 2017) . As relevance was integral to ensure the rigour of the study, considerations of context were highly valued. Tracy (2010) categorised research into four i.e.

procedural, situational, and culturally specific, relational ethics and exiting ethics. For the scope of this study, I found West and others' (2016) definition more appropriate. They argued for a balancing of both *values* and *context*. I used a 'human subjects model' (The National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research, 1979) to ensure utmost quality of ethical standards. This model emphasized on three ethical goals - respect for persons, beneficence, and justice. This was ensured through the practice of informed consent, protection from harm, confidentiality, and anonymity.

Informed consent was adhered in the study by ensuring voluntary participation and valid consent based on full information (Biros, 2018; Cohen et al., 2017). It was verified that participants had the competence, modalities, and resources to access and understand the nature and objectives of the study. All the participants were comfortable with English and hence there were no ethical challenges regarding the use of language. Consent was collected via email after the participant information sheet (PIS) was shared with the potential participants. Both the PIS and the recruitment advertisements clarified participants' rights and responsibilities. For instance, they had the right to withdraw from the study at any time without stating the reasons. PIS explicated the process for the same. It also explained the shared etiquette for the event and the means by which participants could follow up regarding the study. The participants were given between 7 to 10 days to go through the research brief and was encouraged to discuss any queries with the researcher.

The measures for ensuring confidentiality, anonymity and privacy were explained in the PIS. Participants were allotted Unique Identifier Numbers which were then used to record and store any data that was shared by them. All the data were stored on password protected and encrypted folders within the university IT network, immediately after the collection process. They were contacted on their official email IDs outside their office hours but were requested to delete any research related correspondences after the data collection process. This was done to ensure non-traceability of data. For the same purpose, quasi-identifiers such as location, time, organizations, affiliations, and cultural attributes were removed. This process is called de-identification. Additionally, they were encouraged to switch off their videos for maintaining anonymity. However, all participants preferred to keep their videos on. Participants were requested to not use the chat box until necessary and all waiting lobby access were denied securing the interview platform. As the study involved interviewing Government officials about a state-driven policy consultation process, it was important to ensure that their identities were protected from any short term or potential harm. Harm in this discussion included notions of both physical and mental harm. Appropriate and tangible measures were taken to ensure no questions

or discourse regarding party politics were initiated unless the participants preferred to. They were also frequently asked to share any concerns regarding immediate or potential professional harm. Finally, participants were informed how their data would be used and a copy of the same were agreed to be provided on or after the publishing date.

I do not maintain that ethics should be ensured at the cost of the research value. As a researcher, I firmly believe that any research can be rigorous as well as ethically uncompromising at the same time. However, the research also suffered from methodological and epistemological limitations. Firstly, the small sample size affected the findings' generalizability and validity. Especially the absence of community members denied an entire discussion of the research question. Secondly, the boundaries between the different epistemic categories such as participation, consultation and engagement would have caused discrepancies in the design and conceptualization of the measurement framework. Finally, the inaccessibility of official and unofficial policy texts rendered the documentary analysis inconclusive.

## CHAPTER 4: FINDINGS AND DISCUSSION

### Introduction

In the previous section, I explained the rationale and the application of the research methodologies and the implications of using these methods. To reiterate, there are two objectives to this qualitative study. Firstly, I intend to learn the normative difference between the theory and practice of NEP consultations. Secondly, I aim to measure NEP consultations based on the theoretical framework proposed in the literature review.

This section has three goals: Firstly, it recaps the relevant methodological process and presents the findings from those exercises. Secondly, it interprets the meaning of those findings and answers them in relation to the research questions. Finally, it locates the findings on the broader literature and insights and offers comparisons and contradictions with that literature. I attempt to reach these answers through a rigorous and reflexive content analysis of the policy texts and the interviews.

I discuss the data and the interpretation together. Neither of them is written in any order of the research questions. Instead, they are arranged in terms of broad thematic categories. These thematic areas will be further summarised in the concluding chapter of this thesis.

The study began with two assumptions: One is that the policy texts will illuminate the theory that guided the consultation process. The second is that the interviews with the actors who were a part of the lived reality of this process would shed light on its practice. However, soon into the document analysis process, it became clear that both the document and the interviews would alternatively and iteratively inform the theory and practice. Systematic content analysis has been used to separate this insight: For example, the use of future tense usually denoted that it was a theoretical guideline, but the use of past tense denoted that it was the practice of the same. That is to say that the research question is not answered by two methodologies distinctly but by combining these at different points.

The policy documents were analyzed first because of their ease of availability and access. They were also helpful in informing the interview instruments and process. Therefore, documents 1-13 were analyzed in the first quarter of the study. It was followed by two interviews which directed me to the last seven documents. The last two interviews were conducted in the final quarter of the study. Figures 5a and 5b illustrate the final list of codes and categories.

Figure 5a: Categories of Analysis

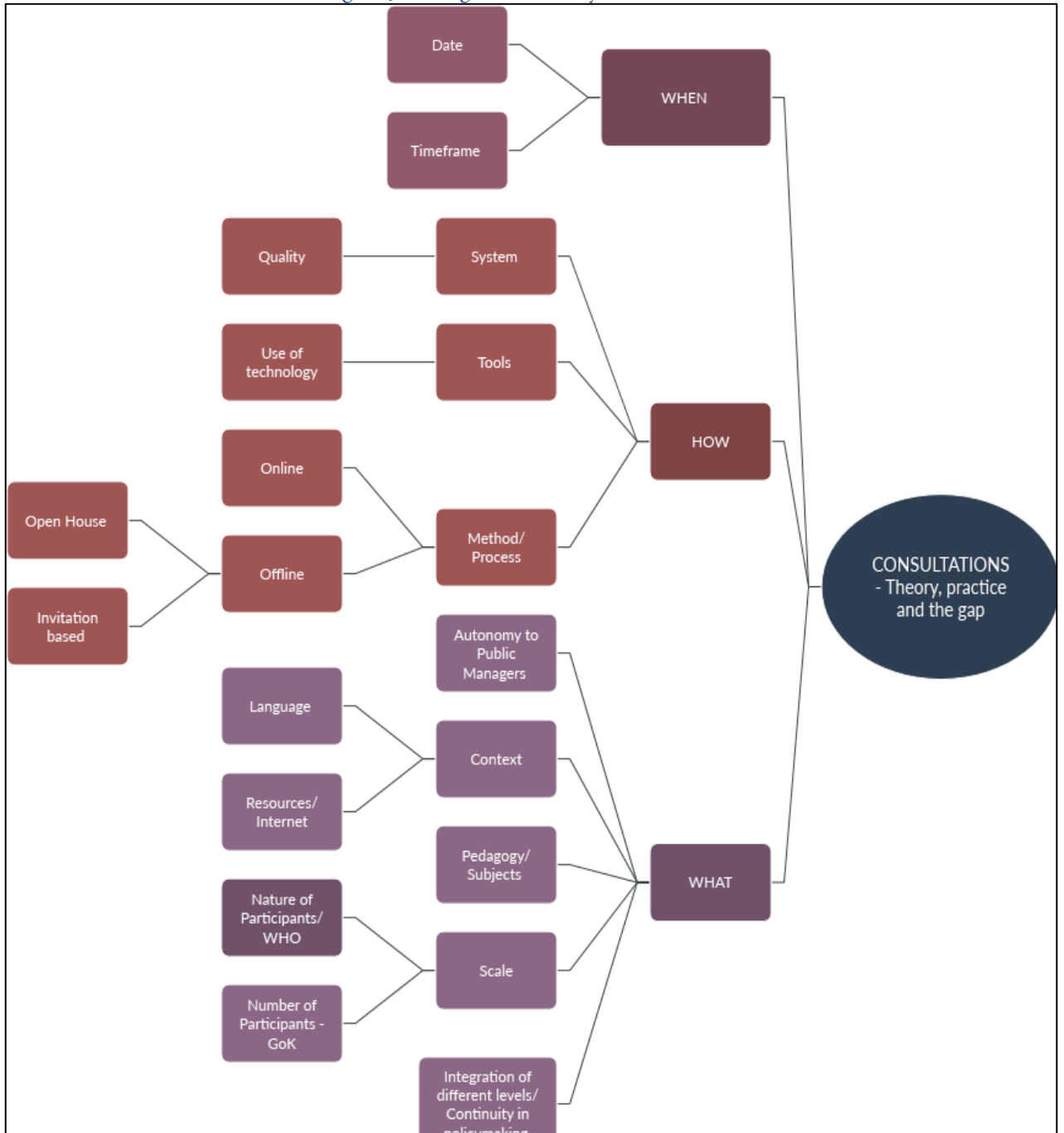
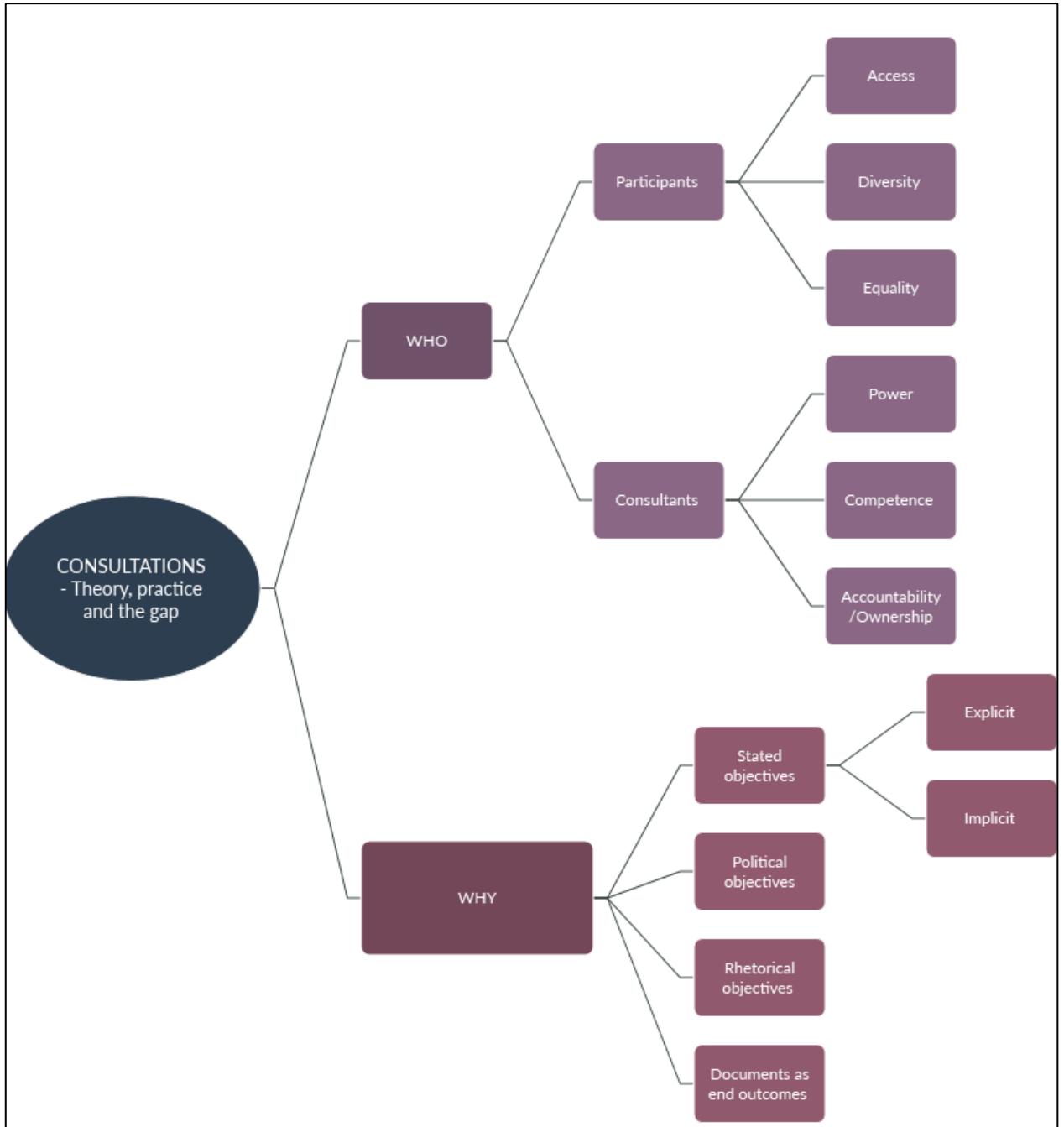


Figure 5b: Categories of Analysis



## Why: Objectives of consultation

The following keywords were found to be most used to define the objectives of the consultation process.

Table 7: Objectives of consultations in theory and practice measured as word frequency

Keywords used	Frequency of use in policy documents	Frequency of use in the interviews
Participatory	4	3
Cooperative federalism	2	2
Consensus	1	2
inclusive	5	3
democratic	1	6
Holistic	6	0
Diverse	4	0
Stakeholders	4	6
Vision	1	8
Concurrent	2	2
Bottom-up	6	4

These findings demonstrate three striking conclusions. Firstly, there is a broad consensus in the policy scholarship about the objectives of the consultative processes. However, some objectives were emphasized more than others. Secondly, the evidence on this is more theoretical than empirical. Thirdly, the measurability of the evidence is not supported by evidence.

The documents and the respondents used the same terms and phrases to describe the objectives. The participants also satisfactorily substantiated their perceptions about objectives. One policymaker commented,

*We just did not want the policy to have only an intellectual viewpoint, but we equally keen on knowing what the common man wanted.*

– Participant 1

This was echoed by another policymaker who repeatedly used the word aspiration to describe the consultation's objective. They said,

*First, we wanted to have an idea of the different stakeholders of education. That was the basic purpose. Normally experts frame the policy for the country. However, I think this education policy is a policy of the stakeholders. I think how [policy builds] itself is an inspiring journey, and I think it is the nation's aspiration. I believe that is the biggest achievement [of the consultation process].*

– Participant 3

Another policymaker added that the consultations achieved accountability because the community started owning the policy. They argued that as they were pro-actively involved throughout the policy design, it was understood much earlier that this is not a policy *of the country* but *of the people*. However, as one policymaker remarked, this did not mean it was perfectly defined or achieved.

*What surprised me is that after the end of having formulated a policy with such democratic processes, there are apprehensions and concerns that several were not asked for their views. Who is left out? We gave all citizens, autonomous bodies, central Ministries and state governments, associations, public representatives and reached out to every village, local, district at the sub-national levels, so there is nobody left out.*

- Participant 1

It is evident that the consultative process, even in its most imperfect form, provided a multi-level platform of dialogue amongst the citizens and between the citizens and the policymakers. There is evidence of communication between the states and between the states and the central government. Theoretically, the consultations were bottom-up as the policy design process emerged from the village level, as confirmed by the policy documents and the policymakers. How do we know the goals, in theory, were achieved in practice? When do we know we achieved our determined inclusion, diversity, and consensus levels? These answers were not clear from the interviews or the documents. The subject-matter expert remarked,

*In theory, you want to have many things, you want to have a perfect policy, you want to have a right to education and all of that, but if you do not have a roadmap to implement, if you are not going to spend the amount of money it requires to implement it, then this is a useless process.*

– Participant 4

This suggests that even though there were consistent and precise definitions of the objectives within the policy documents and the policy leadership, there were no benchmarks to measure its achievement. The findings concur with the broader literature that categorised the aims of consultation into four: discovery, education, measurement and persuasions (G. F. Johnson & Howsam, 2018). As the participation scholarship argues, consultations help achieve consensus, equality, and dialogue between the government and the governed (Bunea, 2017; Fraussen et al., 2020; Ryfe, 2005). Moreover, it benefits both parties to achieve empowerment and efficiency (Bishop & Davis, 2002). However, the effectiveness of the goals cannot be achieved by merely defining them but only by outlining a genuine, systematic, and ambitious roadmap for the ambitious goals (Pellatt, 2003). The data shows that this was lacking, if not wholly, at least partially.

## Who conducts consultations? An analysis of the consultation leadership

I commenced the study assuming that the policy drafting committees were responsible for the consultations. It was clarified by a participant who stated,

*The policy is not the outcome of the Report of the Kasturirangan Committee<sup>3</sup> or the Report of the Subramanian Committee but of the enormously large numbers of inputs, outcome documents, views, suggestions that formed part of the consultations. The Government itself drove these consultations.*

- Participant 1

There was a change in committees during the policy design process. It finally materialised in June 2017, almost one year after this decision was made, when there was general dissensus in the parliament regarding the draft submitted by the first committee. However, the reports submitted by both committees agree on the objectives without any argument. The processes appear to be consistent even after a change of committees. It is evident from the similar use of words and phrases as explained in the previous section. However, no sufficient textual evidence was found in the policy documents on two matters. Firstly, why did the committees change? Why was there dissensus in the first place if the MHRD led the extensive State consultations? Secondly, how did the second committee pursue choices and actions to fill the gaps and weaknesses of the previous committee, specifically in consultative processes?

The literature review concluded that the question of who consults and who is consulted is a strategic decision. It does not exist in a vacuum but is decided by multiple contextual and systemic factors such as the policy issue, its urgency, and its underlying philosophies. Drawing from that, I wanted to explore how a change of leadership for a consequential policy was facilitated. Most importantly, I was interested to learn what incremental impact this change of ownership achieved. Interviews helped clarify the rationale and consequences of such an ownership shift. The subject-matter expert commented as a response to these discussions,

*The first [committee] was rational. They were logical and sensible.*

- Participant 4

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<sup>3</sup> Two expert committees were appointed for the policy design, one in 2015 and the other in 2016 respectively.

This remark was based on their experience working with a large-scale education non-profit that was an active stakeholder in NEP consultations.

A policymaker, on the other side, argued that there is a difference in the quality of the reports produced by the second committee and that it is self-evident. The leadership quality of the committee head, who “*never compromised on the quality*”, was one reason that explained this difference. They also discussed the apolitical and visionary nature of the committee in general. Another policymaker echoed the same sentiment, by maintaining that a difference between the two committees was that one was led by a bureaucrat and another by an educationist. They added,

*The Subramaniam Committee had four bureaucrats and one academic. There was a strong perception that officials or bureaucrats are neither experts in education nor educationists and hence not the right people to frame an education policy for the country.*

– Participant 1

This data illuminates that leadership characteristics could determine the nature of the consultations. More importantly, a change of leadership should be considered an essential factor in this analysis. As it is a costly and time-consuming decision, assuming that such a transition would only be executed for specific political, administrative, or rhetorical goals is reasonable. The data does not lead us to a significant conclusion but improves our understanding of the interplay between policy leadership and the consultative processes.

A policymaker also remarked that the leadership strengths in Karnataka specifically impacted the state’s consultation efforts positively. They concurred that two reasons helped the state design and implement the policy - the number of leaders who belonged to the state in national level leadership and particularly in the drafting committee and secondly, their professional expertise, thereby providing regular and immediate mentorship to the Government’s efforts. This demonstrates that the competencies and incompetencies of the state teams would have had a remarkable impact on how consultations were conducted.

In summary, I infer that a change in the political leadership could have remarkably impacted how the consultative process was planned, conducted, and incorporated into the policy. The fundamental philosophies of the process were perhaps defined differently by both committees. This finding is consistent with Yang & Pandey’s (2011,887) argument that transformational leadership is integral for participation outcomes and that participation mechanisms are “not standardized menus, but are

practices enacted by managers”. This suggests that much of the policy design is determined by the *leadership quality* of policy leadership and officials (Stewart, 2007). It also aligns with Thomas’s (1995, p. 11) proposition that managers often determine the “form and extent” of participation.

### Who participates in consultations?

I analyzed this question from two perspectives – the number of participants and the nature of participation. The following table gives a summary of the scale of participation, both in theory and in practice. The information regarding the proposed scale was obtained from the policy documents, specifically from early 2015 to mid-2016, when the consultation guidelines were still being planned and formulated. I learnt about the scale of implementation both from policy documents (Docs 4, 8, 13-24) and group 1 interviews. These documents proposed and projected the expected figures for participation. Although the consultations were initially planned for a period until December 2015, they continued till the release of the draft policy in 2019. As one policymaker remarked,

*Between the Kasturirangan report<sup>4</sup> and finalization of NEP, the ministry drove consultations because education as a subject is within the concurrent list, and some State Governments had raised serious concerns and apprehensions about the recommendations contained in the report.*

-Participant 1

Further documentary evidence cemented this finding. Documents demonstrated that consultations continued to be organised immediately after the formation of the second committee. For instance, there is evidence of consultations conducted in July 2017 in Document 2, which provides details of 74 institutions and 217 eminent persons consulted before the publication of Draft 2019. In the following table, we compare the scale of participation in theory and practice:

Table 8: Scale of participation in theory and practice

SCALE			
	THEORY (number of meetings) <sup>6</sup>	PRACTICE <sup>7</sup> (as on 19 Feb 2016) School Education	PRACTICE (as on 19 Feb 2016) Higher Education
Gram Panchayat	2.5 lakh	110506	23

<sup>4</sup> Submitted to the Parliament in 2019

<sup>5</sup> On July 21, 2020

<sup>6</sup> Projected figures for 2015 in Document 7

<sup>7</sup> Number of stakeholders who uploaded their suggestions on MyGov

Urban Local Bodies	6000	724	925
Block	6600	3249	2722
District	676	339	405
State/UT's	100	18	17
Online suggestions	NA	6027	
Regional	8	6	
MHRD driven Thematic	NA	38	
National	12	95	
Individual Institutional	NA	781	
	2,57,396	1,25,875	

Although this table is only supported by evidence in the public domain, the numbers failed to provide a cohesive explanation of the scale. One policymaker clarified this gap,

*For the grassroots consultations, we did not have 100% participation for the sub-national units of villages, blocks, urban local bodies, which no doubt had 60-70% numbers. However, the fact that they came forward with more than 60- 70% participation rate was gratifying enough for us. As we never expected it to be 100% in any case.*

-Participant 1

Even though the policy texts provided descriptions of its aims for participatory and inclusive consultations, it fails to provide convincing explanations. In Document 4, which contains the comprehensive list of consultations carried out until 30th March 2016, the following observations were noted.

Table 9: Evidence of community representation in the policy documents, 2016

Participant group/Issues	Number of consultation items such as inputs/suggestions/ documents	Page numbers for reference
Dalit organisation	1	30
Minority issues	3	26, 27, 61, 105
Marginalized community	2	11, 21
SC/ST issues	2	21, 33
Tribal affairs	3	22 and 28
Women and child development matters	11	22, 26, 27, 71, 100, 101, 105,106
Issues of disabilities	2	27 and 99

This analysis was performed by finding the critical participant groups that the policy promised to include in the consultation and searching for these keywords and root words (e.g., Searching for ‘minorit’ instead of ‘minorities’ to capture all the relevant results) in selected documents. The searches were further done manually to confirm that no case was excluded. However, the discrepancies in the annexure document in the form of recurrent spelling mistakes, errors in serial numbers, and the use of short forms would have resulted in some missing observations. Even that being accounted for, these are disappointing numbers. For example, a text query search of keywords ‘transgender’, ‘prostitute’, and ‘disadvantaged’ did not offer any additional responses. However, a search on the keyword ‘backwards’ showed one consultation item corresponding to the backward community in Pg. 60. This demonstrates that most of the participation, especially of the marginalized communities, was not intentionally, systematically, and administratively facilitated even though they were codified objectives of the consultation process. Instead, they were arbitrary outcomes, an output of chance rather than choice. The same analysis performed for Document 2’s annexure yielded the following results:

Table 10: Evidence of community representation in the policy documents, 2019

Keyword used	No of results	Page numbers for reference
Minority	1	pg. 453
Dalit	0	
Tribal	1	pg. 462
SC/ST	0	
Disabilities/ Differently abled	1	pg. 460
Women	4	Pg 458, 462, 464, 465
Transgender	1	pg. 459
Marginalized/disadvantaged/ poor/rural/low-income	0	

The Group 1 interviews were helpful in understanding and clarifying some of these gaps. The main keywords that emerged in the policymaker interviews when asked about the question of inclusion were ‘slum population’, ‘sex workers’, ‘laborers at night school’, ‘transgender people’, ‘differently abled’, ‘SC/ST’, ‘Rehabilitation council of India’. When requested to verify the validity of the committee’s diversity and inclusion efforts, a policymaker stated, “the media would have reported any intentional or unintentional practices in the consultative process that was non-inclusionary”. They added,

*I was amazed; the youngest child who wrote to us was a seventh standard student. The more senior person, a 70-year-old, communicated over the telephone, saying, ‘I have been trying your Ministry landline*

*number. It is so difficult to get through. Can you help me get someone to note down my suggestions, as I cannot write them all down?*

– Participant 1

They also explained the quality check systems and processes that were in place,

*The Ministry held preparatory video conferences. We selected eight districts from each state. The district collector, along with the district education officer, had to be present with school representatives and other relevant stakeholders. When the eight districts were selected from a given state, it was ensured that hilly regions, tribal regions, SC-dominated regions and urban regions, along with the very backward district, were included. So, in those preparatory video conferences, we heard right from their voices on the policy inputs.*

– Participant 1

It was still unclear how the scale of participation could be objectively and accurately measured. The policymaker added,

*I do not think there was any physical attendance taken; one would only know the large numbers, let us say in Maharashtra or any State, they would only say that in a particular village we had a discussion. The State Government has that data.*

– Participant 1

The evidence indicates that the participation was not as perfect as the popular narrative celebrated.

Although the participant recruitment process was not transparent in the documents, the interviews confirmed that the grassroots-level local consultations were not done by invitation. “It was an open house, and anyone was welcome to join”, one of them remarked. In meetings where participants were invited, most of which were held at the regional/zonal/state level, three critical factors were considered: the experience and legitimacy of the institution/individual, the geographical spread of their impact and representativeness. They added,

*.. We have taken educational institutions geographically spread over not only from one region but from across the country. The premier institutions and institutions working in remote areas were also invited.*

- Participant 3

Additionally, they argued that efforts were taken to support the participation of marginalised groups, especially. For example, they mentioned that a team of transgender people who participated in one session were given lodging and travel facilities to attend the meeting.

In conclusion, it is evident that the consultations were poorly structured, especially by the first committee, as corroborated by the lack of proper frameworks and systems for documentation and monitoring. There is evidence of attempted efforts, and to some extent, there are explanatory descriptions of participation from selected communities. However, for the most part, the effort seems tokenistic and not systematically aimed at inclusion as an aspiration. A dearth of documents in this regard does not help our inquiry. However, the objectives of inclusion as carried out by the second committee is clearer and well placed. One policymaker raised that the aim was to capture the aspirations of all and every people. They mentioned that even if certain groups volunteered to participate even when not invited, the committee encouraged such endeavours because they believed that “it is important to listen.”

The findings confirm that a systematic stakeholder analysis (Schwartz & Deruyttere, 1996) was not conducted, the impact of which is demonstrated. This finding is in line with the scholarship that maintains that community participation in the consultation is almost often tokenistic and limited in agency (Arnstein, 1972; Macintosh, 2004). Thomas’s postulation of ‘imperfect participation’ or the participation that is non-representative helps explain this trend. However, he also argues that “a complex public is a dilemma for a manager” (Thomas, 1995, p. 57). Nonetheless, it would have been appreciable if the State transparently communicated to the public instead of using inclusion as a buzzword to further a political or institutional agenda.

### How: Methods, tools, and techniques

In terms of the methods and tools adopted, the difference in theory and practice was difficult to evaluate, but this section will explain and interpret the findings in light of the evidence available.

Firstly, the policy document analysis demonstrates that there was utmost clarity in how the consultations should happen. There are detailed workflows with information including but not exhaustive of date of meetings, officials who should lead and participate, what documents to produce and how to submit the reports (Documents 7 and 9). However, there is no documentary evidence regarding implementing these plans and workflows, at least in the public domain. According to the information provided in Document 4, there is sufficient reason to doubt whether the proposal materialised. For instance, the framework document (Documents 7 and 9) states that the consultations at the village level were expected to happen on ‘a select day’ to ease collation and analysis at the block

level. However, on pages 19 and 20 of document 4, the dates of village consultations range from 6th October to 18th December.

The grassroots consultations were organised in the format of open houses or public meetings. A participant remarked that it was the best approach to ensure maximum participation. The questions and the format for discussion were determined based on the stakeholders and the purpose of the meeting. The participant added, *“we will always have to pick and choose a method”* (Participant 1). The literature widely talks about consultation approaches (Fraussen et al., 2020) and argues that hybrid consultations are the ones that attract the most stakeholders. However, this decision is also deeply contextual. For instance, closed meetings with limited entry could be misinterpreted as elitist and exclusionary and may not always be the best approach at the local level. However, as discussed earlier, the state and national meetings were mainly closed. Therefore, we can conclude that NEP consultations employed a hybrid consultation model. Unfortunately, a theory-practice comparison is not feasible because there is not considerable information about this aspect in the documents.

Secondly, the documents mention that every resolution at the grassroots level to be uploaded on the MyGov website should be within a limit of 500 words. The documents state this is for systematic ‘collation’ of inputs. Although this appears to be a reasonable and technically sound idea, it is not easy to hold in practice, mainly because the school education and higher education themes had 215 questions in total, 103 in the former and 112 in the latter (Table 11). Even in a case where all the questions were not discussed, two concerns emerge: How much time did one consultation session take? Even if effectively synthesized, would 500 words be sufficient? An official remarked that the duration of consultations was determined based on the agenda and the stakeholders. They added, *“Some would take an hour. Some would take a day.”* Although most of the process ideas appear feasible in theory, it inspires one to think about how we could have produced a policy after consulting citizens of 2.5+ lakh villages in 6 months. Logistically and administratively, this does not sit to be a feasible task. It also potentially explains the delay in conducting the consultations and producing the draft policy. Discussions regarding scale clarify some of these inconsistencies.

Table 11: Number of questions for consultations

Themes in SE	No of Questions	Themes in HE	No of Questions
30	103	20	112

The policy documents themselves provide sufficient instantiations of how quality was planned to be achieved. These are as follows:

1. Moderators were appointed to monitor the online conversations, unique IDs were provided to local units to track the status, and a NEP taskforce was set up to oversee the consultative processes (Document 7)
2. A moderator was appointed for the discussion of each theme (Document 09)
3. The nodal<sup>8</sup> officers attended selected consultation meetings, and training manuals were used for smooth implementation (Document 8)
4. The committee members and state-level leadership were provided unique IDs to easily access the consultation data (Document 9).
5. User dashboards were available to monitor status and compile reports (Doc 10)
6. Preparatory video conferences were conducted for in-person discussion of the consultative process (Respondent 1).

Thirdly, the policy documents maintain that the bottom-up approach was facilitated by a cumulative aggregation of data at every other level. For instance, the block level official would synthesize the suggestions from all the villages in that block. This process brings two questions to the forefront: Was the workforce trained well to conduct this analysis and synthesis? If yes, was there a framework that guided them? The documents did not help answer these questions. Some of our interviews were useful in this regard. The policymakers clarified how a rigorous content analysis aided this process at the committee level, constituting steps such as searching keywords and developing themes and categories for the summaries. However, there are two reasons to doubt its execution at the local level: Firstly, no explicit evidence exists in any documents. Secondly, NEP consultations were an additional duty for most local officials. Even when rigorous training was provided, the timeline does not clarify how the officials could have honed their skills or exercised them properly. On average, there are ten villages in a block. According to Document 4, there is only a maximum of 30 days allotted for the entire consultation and collation process at every grassroots level (Pg 11). Even from a project management perspective, this appears to be an arduous task for a month. However, from the policymaker interviews, it was discerned that the accuracy was not expected. *"We never expected it to be 100% in any case"*. One of them remarked while talking about the challenges in implementation.

A final theme developed in the analysis was the relevance and application of technology. Almost all documents explicitly or implicitly mentioned the role of conducting the consultations at scale. For

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<sup>8</sup> State-appointed senior leaders at the local level

example, according to Document 9, the National Informatics Center took care of the digital interfaces and “created 7.5 lakh user IDs for information officers to drive the consultations.” Participant 1 confirmed this. *MyGov* was the centralized platform for the systematic conduct of consultations. The general public also used it to send in their inputs and suggestions. There are 5927 online submissions received in response to the draft 2019 report. An official proudly mentioned that the technology was instrumental in the collation of data, and the data was always there if anyone wanted to refer to or validate it.

*The ministry and the state nodal officers were called the master users. As the ministry officials, State government officials and State Information Officers, we had access to data uploaded at the ULB and village levels.*

– Participant 1

A participant remarked that technology was used in content analysis and report generation. They added,

*We used technology to find the words used the most and learnt why it is so. So, for example, if equity is the term used more, we will count the number of times and then finally link it to the themes we can identify under equity.”*

– Participant 3

The consultations were guided by what was called backgrounder documents detailing the 33 thematic areas in school and higher education. Literature suggests that the public should be ideally involved in defining this problem statement. However, the interview contradicted this as the participants confirmed that such thematic documents were only prepared to do focused discussions and as a starting point, providing the overall framework. They also confirmed that the questions for the grassroots level differed from other consultation levels. They emphasized that these documents were not leading or opinionated but only “stated the facts as they stood” (participant 1). One of them confirmed that these themes were then developed as chapters in the final policy, demonstrating how all the puzzles eventually fit into one big piece. It is reasonable to doubt how much the government officials were able to engage in the thematic discussions. The backgrounder documents are theoretically dense and textually voluminous. Both documents amount to a total of eighty pages. Even though the intention is well placed, the result is questionable.

In conclusion, the consultation appears to be planned to the last detail, but it is too far from reality. Although the government and the committee were aware of and did foresee practical challenges on the ground, it is unlikely that the quality planned in theory matched in practice. The debate is not

whether consultations happened. It is the depth of those consultations that my result doubts. As our expert accurately pointed out,

*You do not conduct 5000 consultations and say we have heard everyone. Now let us sit and write on our laptops. That is not how consultations work.*

-Participant 4

## Theory and Practice: The contextual realities of implementing consultations

A final component of this inquiry was to evaluate the contextual and lived reality of implementing consultations. The main categories of this analysis were the role of language, the questions of digital access, the influence of politics on policy and the nature of community participation. Especially in the context of a country as diverse as India, this analysis aimed at learning how much the contextual and universal could coexist.

### Language as a means of standardization and contextualisation

The policy document demonstrated preparation and foresight in this regard. For instance, Document 7 mentions that all the resolutions by the local bodies will be ‘uploaded along with the English translation on *MyGov* platform’. It was also mentioned in Document 11 that the draft NEP had been translated into twenty-two languages. Yet another document states the following,

*The aggregation of suggestions at Gram Panchayat, Block Level and Local Bodies available for viewing the consultation document would be translated in local languages to tide over the problem of linguistic barriers.*

– Document 6

Document 9 also had evidence substantiating that states and local bodies can upload consultation documents in their official languages. Most policymakers concurred with this when they mentioned that their teams had members from many states, thereby helping to cross the language barrier in consultative communication. One of them remarked,

*We used Hindi, Kannada and many other languages. In addition, our team had people from different parts of the country so that we could manage the diversity to a greater extent.*

– Participant 3

Even though they agreed that the principal language of communication was English, they ensured that all steps were taken to make the “technical language more understandable”. Even in cases where the language was not a concern, the policymakers agreed that making the citizens understand the consultation process and questions were difficult. Citizens were interested in sharing the concerns of their local, social and geographical contexts, but this myopic focus, according to most of the officials, hindered the discussion of macro issues. The tension between the local and the universal seemed to be particularly evident in the group 1 interviews. One official argued,

*Our country is very diverse. There is diversification at all levels. Every group from different regions of the country represents a diversity of caste, religion and cultures. They have their own aspirations.*

– Participant 3

The deliberate focus on language in policy must be highly recommended in a country like India, where the language changes almost every 200 kilometres. Pellatt (2003,5) argued that there needs to be a “common language between government and the community for discussing the issue”. He asserted that this helps discover and refine the policy problem. It was also proposed by G. F. Johnson & Howsam (2018), who argued that it is essential for participants to be able to participate. They emphasized the role of language and literacy level of participants in successful consultation. The findings concur with the existing scholarship and demonstrate that the language of the community is vital to the quality of consultations.

### Technology and the lack of it

Another impediment in implementation was the perceivable digital divide across the nation (Yadav, 2022), particularly between the rural and urban areas. Policy documents demonstrate that the Government was prepared for this challenge. For instance, one document cites,

*Since internet access may not be available to GPs/BPs and some ULBs, the District Nodal Officer will facilitate the uploading of the local-body’s resolutions and the related data entry through DIO/ Block level offices where internet connectivity will be available.*

-Document 9

In addition, the documents suggest precautions to overcome the internet issues: intermediary save options, predetermined deadlines for submission of consultation reports and offline uploading of reports are only a few. The analysed policy documents discuss ‘accessibility to the internet’ in the

context of consultation five times, thereby confirming that it was a pivotal factor in the planning process.

In interviews, this was confirmed significantly. The policymakers emphasised how the public managers on the ground were given complete autonomy in executing the consultations. One of them remarked the following, supporting the view that the internet was not the end but only a tool to facilitate the process,

*So if they had issues about uploading the meeting notes, the simplest method was they could write it out, or they could record it, and give it to us. Citizens were free to use any method, whichever was working...”*  
- Participant 1

An official further explained that the local officers would change their meeting sites based on the internet access even if it was inconvenient and an added administrative duty on that day. It was clear, both from the interviews and the policy documents, that there was flexibility for the local officials to use the tools in the way they intended to and in the way it fitted their context best. It was an added achievement that, philosophically and principally, the leadership empowered the local officers to conduct consultations in a manner that best suited their local unit. Fraussen and other (2020) maintained in their study on consultations that providing clear bureaucratic guidelines are integral for effective consultations. This attention to the local context and the consequent autonomy of the grassroots leadership should be considered as a positive step in the broader process of consultations.

### Are citizen participants perfect?

Another challenge in the implementation was the nature of participation by the community. The interviews confirmed that the participants would use the consultation to share personal grievances. One participant mentioned,

*In five minutes of their answers, only one minute would be the important part. So, we had to listen to the five minutes to note down that one important point.*

– Participant 3

They explained that this does not imply that the community does not offer constructive ideas but that they are located in their immediate and intimate lives. It, in turn, necessitates rigorous analysis to summarise and comprehend citizen views as valid and universal policy inputs. They further added,

*Such listening, dialogue and empathy towards their problem will help us set a good platform to discuss further. Often, the problems they express will definitely have a dimension of challenge. We need to decode that.*

– Participant 3

Another participant also shared a similar concern recounting one such instance,

*They were not talking about policy issues; they were talking about grievances affecting the teachers. Now, that's one point of view. That was not a policy input, but you can't stop someone to say that.*

– Participant 1

It is evident then that it is difficult to connect the purpose of consultation to the process of it. It then becomes the policymaker's responsibility to choose between listening to all citizens or selected citizens or *relevant publics* (Yang and Pandey) based on their assumptions. One policymaker pointed to a lack of awareness regarding consultations in the community as the primary reason for this gap.

According to Yang and Pandey's (2011) conclusion, participant characteristics are the most important explanatory variable in determining effective consultations. The finding above agrees with their conclusion that participant competence is crucial in a good consultation, especially when they can adjust for other variables like representativeness. Irvin & Stansbury (2004) asked an important question: Why do we assume that citizens want to participate? Most scholarship, including that of Ryfe (2005), urges us to consider what motivates and does not motivate ordinary people to participate in consultations. These discussions are valuable in deconstructing the notion of the 'perfect citizen' and encourage us to think about the potential challenges in constructively engaging enthusiastic citizens.

### Politics within and beyond the consultation

As discussed previously, political ecosystems and environments were also considered an impediment to the quality of consultation. The subject-matter expert remarked,

*There was a sense of urgency and impatience across the space. So, the way offices functioned, the way bureaucrats worked, and the way policies were being implemented, they were in a hurry to showcase results and do many things. As a result, they became impatient, and it appeared they were trying to make a policy in six months.*

– Participant 4

The expert maintained that the ruling government pushed the policy to enforce their political agenda and the promise of ‘good governance’, a philosophy at the core of their election manifesto. The policymakers maintained that politics within and across the government influenced the imperative of consultations. They reiterated that consultations were included because education is on the concurrent list and that it was essential to consult states and citizens for the spirit of cooperative federalism. As a response to the question of why there was a change in the committees, a policymaker recounted,

*And it was on 12 August 2016, in a short discussion ..... which was a very heated discussion on the floor of the house [of parliament], you had members tearing up the report, you had honourable members of the parliament saying that this [Draft 2016 report] was sort of authoritarian.... Centralised by nature.*

– Participant 1

The governments and political parties have played a crucial role in influencing what the consultations should achieve, by when and how. The policymaker affirmed that a policy is an executive decision, implying a clear boundary between community voice and administrative decisions. Could we have separated the politics and policy? Perhaps not. However, at least we could have done the integration better.

The scholarship agrees unanimously on this matter. Politics is inevitably a part of the policymaking process, but as many scholars (McPherson & Raab, 1988; Walford, 1994) proposed, it is essential to acknowledge and accept the broader power structures in which the micro process of policymaking occurs in order to see the aggressions, injustices and contradictions that are a result of these hegemonic interactions.

## CHAPTER 5: CONCLUSION

### Summary of the findings

The study evaluated NEP's consultative process based on an innovative and contextual scale developed from the literature and research methodologies. The evaluation was administered at four different levels.

Firstly, I analysed the policy texts and interviews to interpret the objective of consultations. It was discerned that the objectives, or functions as defined in the literature review, were clearly outlined in the policy texts and the participant interviews. However, some objectives were considered more valuable than others. For instance, keywords such as *inclusion*, *participatory* and *bottom-up* were used more frequently to describe the purpose of consultations. An in-depth analysis showed that although the objectives were clearly defined, the benchmarks for definition were not. Hence, it is difficult to conclude whether we achieved these objectives in the manner they were envisioned. Additionally, this lack of clarification would impact current or future efforts to evaluate the consultative process.

Secondly, the nature and extent of participation were analysed by examining evidence demonstrating scale and inclusion. It was observed that the theoretical aspirations and practical realities of participation were far from similar. It was also inferred that the policy leadership played a pivotal role in determining its effectiveness. This difference is mainly seen in the practice of inclusion and representation of marginalised and disadvantaged communities. Although consultations were conducted as hybrid models, there is no evidence that they improved the quality or quantity of participation.

Thirdly, the practice of specific monitoring systems was apparent in the study of process variables. For instance, technology has been extensively used to support the stakeholders and standardise the consultative process. Data also showed that systems were used to collect, aggregate and analyse data. However, the implementation and quality of these systems were only marginally substantiated. It was also inferred that some systems, such as word limit use in the resolution forms, could have ended counterproductive.

Finally, I explored the specific aspects of consultation concerning the contextual realities of policymaking. The findings demonstrate that the policy leadership foresaw the challenges and prepared

for them. The efforts taken to cope with the changing demands of language and technology are commendable. However, the effects of imperfect citizen participation and partisan politics have significantly hampered the carefully curated implementation process. Based on these findings, I conclude that the policy and the consultation process succeed as visionary blueprints but suffer from an evident theory-practice disintegration. However, some of these failures have inadvertently added value to the process. For instance, the contributions of two strong committees have enhanced the validity, rigour and reliability of participatory insights.

The critique of consultations has nonetheless been too perfunctory, which is to say that critique of tokenism is not sufficiently supported with consistent evidence. Specifically, the elite interviews satisfactorily clarified the inadequacies, silences and contradictions unexplained in the policy document. Moreover, it demonstrated the competency and clarity of the leadership undertaking it. That said, it would have been appreciable if the Government was also transparent in its narrative and symbolic messaging, clarifying the inadequacies and limitations of the consultative process instead of celebrating it unreflectively. However, as our expert pointed out, this lack of transparency and the exaggeration of the process was misleading.

My findings indicate that the imagination and implementation of NEP consultations are commendable. However, it could have been more systematic and rigorous. The interviews demonstrated that policy administrators connected genuinely with the lived realities of people. The study confirms that good and bad do coexist and reinforce each other. Hence, tokenism could be too strong a word for the genuine intention that has guided this nationwide project. Nevertheless, the state and the citizens should get comfortable with the idea of imperfect participation. There is no rationale to debate the intent of the process. Instead, this research points to the cavities in the quality of its implementation

It also illuminates the *negative capability* of consultations in the broader policymaking framework (Unterhalter, 2016). The process of consultation and the information captured through it has strengthened the discourse of participatory governance in India. As our expert participant mentioned, "now we are all talking about the same thing." Although some data were lost in translation, *some* consultation has proved to be better than *no* consultations. Consultation is indeed an end in itself and is inherently valuable.

## Implications

The research is not significant or exhaustive enough to infer any future implications for theory or praxis. However, it introduces relevant themes for critical engagement. Although evidence has become a buzzword, especially in the market-oriented ecologies of community participation, I hope I have been able to illustrate its role in bridging the hegemonies of power and redefining the status quo. As an exercise that genuinely holds potential in capturing and using community voice, I maintain that consultation should be a part of policy discourse. *Namesake* or not, it is an inevitable tool to reinvent the slowly eroding relationships between the state and the people and merits engagement in this post-truth world.

# APPENDICES

## Appendix 1: Ethics Approval

**Stakeholder Consultations in New Education Policy (2020): A qualitative evaluation of consultations in India's Education Polycscape  
CIA-22HT-088**

The above application has been considered on behalf of the Departmental Research Ethics Committee (DREC) in accordance with the procedures laid down by the University for ethical approval of all research involving human participants.

Our prior discussion on this was very useful – an impressive team as ever, and project, vastly experienced, and a model of genuine care in relation to research ethics.

I am pleased to inform you, then, that, on the basis of the information provided to DREC, the proposed research has been judged as meeting appropriate ethical standards, and accordingly, approval has been granted.

Please continue to follow all current guidance issued by CUREC during the pandemic, notably COVID-19: CUREC guidance on research involving human participants,

<https://researchsupport.admin.ox.ac.uk/governance/ethics/coronavirus>

*If relevant please also check the CUREC website for their best practice research guides, these can be very useful in refining the writing up of ethical considerations in your research – see*

<https://researchsupport.admin.ox.ac.uk/governance/ethics/resources/bpg>

Good luck with your research study,

Keep well and safe,

Yours sincerely,

All good wishes,

Liam

Chair, DREC

Liam Francis Gearon, PhD, FHEA, FRSA, Docent



Senior Research Fellow, Harris Manchester College, University of Oxford

Associate Professor, Department of Education, University of Oxford

Conjoint Full Professor, Newcastle University, Australia

Docent, University of Helsinki, Finland

Extraordinary Professor, North-West University, South Africa

Visiting Professor, Irish Institute for Catholic Studies, MIC, Limerick, Ireland

Honorary Senior Research Fellow, School of Education, University of Birmingham

## Appendix 2: Participant Information Sheet

### Stakeholder Consultations in National Education Policy (2020): A qualitative evaluation of consultations in India's Education Policyscape

#### PARTICIPANT INFORMATION SHEET

Central University Research Ethics Committee Approval Reference: **CIA-22HT-088**

You are being invited to take part in a research project. Before you decide it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully and discuss it with others if you wish. Ask us if there is anything that is not clear or if you would like more information. Take time to decide whether you wish to take part.

This research is conducted to learn more about the **consultation processes in the making of National Education Policy (NEP) 2020**. As a policy that was released after 34 years of the previous policy, NEP can be considered as a very important effort to change the educational system of India. This is the first time that our government has used a bottom-up approach in policy design where the principles and goals of the policy were immensely dependent on community participation and evidence from the ground. As a researcher from India who is deeply interested in integrating theory and practice, and as an individual who has worked in this space for more than 3 years on the field, I am interested in the following questions:

- **How were consultations planned and how was it implemented?**
- **Were consultations meaningful? Why or why not?**

The study will primarily constitute of interviews with officials, stakeholders and experts involved in/studying the NEP's consultation process. The basic framework and structure of the interview will be shared with you beforehand so you can be prepared about what to expect. All the further details regarding the research are explained clearly in this document.

Although your participation would be immensely valuable, there is **no obligation to take part** in the study. You could take sufficient time to consider this and sign the consent form if and when you are ready. If you do not feel comfortable signing an **e-mail consent form**, I could also verbally record your consent during the time of the interview. You have the right to withdraw from the study, even after signing the consent form. If you would like to **withdraw from the study**, you can do so by a written/ oral communication to the Researcher with or without any explanations. It would be greatly appreciated if you could notify this as soon as possible. I would also be happy to take you through the details of the research, if you are in doubt about any risk/concerns in particular. Upon your withdrawal, all data that has been shared so far would be deleted from the University of Oxford IT network.

#### About the research method

The study will last a three-month duration between May-July 2022. The interview date and time will be decided based on our mutual conveniences, and you will only be contacted beyond that if there is need for any clarification. The Teams interview will be recorded and hence it would be requested to switch your videos off unless until requested by you for any specific reason. In matters concerning data and storage, your discretion is of utmost importance. Hence, please do not be hesitant to communicate about any of the processes or steps in the research that you are uncomfortable with. Audio recording is done for the purpose of transcribing and producing notes later for the analysis. But if you have issues with audio recording, I would be happy to take notes during the interview itself. The interview will last 1 hour with a short 5-minute break in between. For any further clarification after the interview, the date and time for a follow-up will be requested on e-mail. It is essential that these e-mail communications and calendar invites are deleted after the interviews to protect your privacy and anonymity.

### **About the research, risk, and impact**

I believe it is crucial to understand why this study is designed and what are its overarching benefits and risks. India has received a National Education Policy after almost 30 years. Considering the historic moment, we are in, following COVID-19 effects on education and learning outcomes and with the uncontrollable technological development, the system deserves an overhaul. However, this educational reform also needs to pay attention to the needs of the stakeholders. The draft policy itself states why a bottom-up approach has been adopted for its design. As a huge and diverse nation, we have seen our policies and laws failing in implementation due to the lack of attention to detail and rational collaboration with the public. NEP has done a mammoth task of holding 2.5+ lakh consultations in what can be described a 'lightning time'. **I believe this research will add value to the popular as well as expert perceptions on consultations, and how it should be conducted.** Even though policy is unarguably conducted with politics, this study is more interested in the science of consultations than anything. **The focus is on the structure, frameworks, methods, and systems that guides and enables the consultations.** By using a scientific lens, the study also aspires to develop substantive knowledge on what is a meaningful consultation and how would that look in practice. Finally, my research is also investigating **challenges of conducting a 'meaningful consultation'** and suggest how this can be mitigated. I believe the insights from this study will not only add to the broader literature but also to **our own professions and roles as conscientious, collaborative policymakers who believe in a community driven development process.** If you state so, it will be my pleasure to disclose your identity and credit your contributions in any publication/written/oral work that is produced based on this research. Otherwise, all the research data will be purely anonymous. It would be ensured that only the research team would have access to the participants and their contact details.

Nonetheless, any such critical study comes with its risks as well. I completely understand that you and your colleagues have been either interested in the consultation process as a policymaker or as a stakeholder. Hence, there would be **ethical and political limitations to your participation.** It is possible that you would be expected to not engage in any critical discussion about the policy or that position is coloured by your organisation. In such case, **I recommend that you consult with your superior/organisation's media/PR department** to clarify any expected terms and conditions. I would be happy to come in here and share the details of the research, if you believed that would help addressing these barriers. As an ex-practitioner myself who has worked in Karnataka with the Government and other private/public bodies, I understand the boundary between your personal views and that of your organisation. **I clarify here that this research is interested in your**

**perspective as an individual and would not include any political/organisational position into its discussion.** It would be thoroughly ensured that all research data is anonymous, and no traces are left behind to track down the identity of the participants. I request your wholehearted support in ensuring the same. Some of the **steps suggested to ensure confidentiality/anonymity:**

1. Use of Identifying numbers than names
2. Deletion of data after 3 years of publication of the thesis
3. Protection of data by use of encrypted, password-protected storage
4. Limited access to the data
5. Use of audio team calls, preferably taken after office hours
6. Deletion of mails/correspondences after the event
7. Use of headphones during the interview
8. Minimal use of chat function during the interview

The following **data** will be collected as part of the research:

1. Your personal details including contact, email ID and organisational affiliations, Your gender, Your age, Your Unique Identifier Number
2. Your role in the NEP consultation process
3. Your perspectives on the quality, structure and nature of consultations conducted. Your consent as noted in e-mail/oral consent form or both
4. If you opt to withdraw from the research, the mail communicating the same
5. Files of the audio recordings of the interviews
6. Notes taken during the interview
7. Any other documents from your organisation clarifying permissions to participate

All the data will be stored within the University IT Network, in encrypted, password-protected folders. The data will be deleted immediately after 3 years of the publication of the thesis. The researcher and the supervisor will have access to the research data. Your personal details such as contact details can be accessed only by the student researcher. All data will be de-identified. This means that you will not be identifiable from the information you share and is used for the research output. The findings from the research will be written in a **thesis** and are **tentatively planned** to be presented at a conference and published online as blogs/articles. If the data is used at any point in the next 3 years for any reason, you shall be informed of the same. Additionally, the **research summary will be shared** with you, and you will be informed of how your data is used in the publication. I would like your permission to **store your contact details for any further use in the next 3 years. However, I completely understand and respect if that is not your choice** in which case this data can be removed after the publication of my thesis in August 2022.

The University of Oxford is the data controller with respect to your personal data, and as such will determine how your personal data is used in the study. The University will process your personal data for the purpose of the research outlined above. Research is a task that is performed in the public interest. Further information about your rights with respect to your personal data is available at

<https://compliance.admin.ox.ac.uk/individual-rights>. This study has received ethics approval from a subcommittee of the University of Oxford Central University Research Ethics Committee.

If you have a concern about any aspect of this study, please contact XXX at [XXX@gmail.com](mailto:XXX@gmail.com) or YYY at [YYY@gmail.com](mailto:YYY@gmail.com), and we will do our best to answer your query. We will acknowledge your concern within 10 working days and give you an indication of how it will be dealt with. If you remain unhappy or wish to make a formal complaint, please contact the Chair of the Research Ethics Committee at the University of Oxford who will seek to resolve the matter as soon as possible:

The Chair, Social Sciences & Humanities Interdivisional Research Ethics Committee;  
Email: [ethics@socsci.ox.ac.uk](mailto:ethics@socsci.ox.ac.uk); Address: Research Services, University of Oxford, Boundary Brook House, Churchill Drive, Headington, Oxford OX3 7GB

If you would like to discuss the research with someone beforehand (or if you have questions afterwards), please contact:

Researcher

Department of Education

## Appendix 3: Social Media Advertisement

Stakeholder Consultations in New Education Policy (2020): A qualitative evaluation of consultations in India's Education Polycyscape

Ethics Approval Reference: [Insert]

Do you know anyone who studies or is associated with the consultation of New Education Policy, India, 2020?<sup>1</sup>



*Source: Twitter*

I am a master's student at Department of Education, University of Oxford. I am presently studying the policy design of New Education Policy, particularly the theory and practice of the large-scale consultations that were conducted to draft it. I focus particularly on the state of Karnataka and is interested to talk to the consultation committee members<sup>2</sup> and the public who have been consulted online or in-person. I am also looking forward to talk to experts/academics/journalists who engage in this space and will be keen to learn with them.

If you are one of them or know one of them, I would be grateful if you could share this document or directly connect me with those individuals/groups. For further information, please contact me at [\\_\\_\\_\\_\\_@ox.ac.uk](mailto:_____@ox.ac.uk). Each interview would take only about 1 hour and will be conducted entirely online. You would be shared a draft of the questions and have all the rights to withdraw from the study at any point.

Thank you!

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### TWITTER POST FOR ADVERT

Dear friends,

I am working on NEP's consultation processes for my master's dissertation at @UniversityofOxford. I am intending to study the science of consultations and the role of consultations in policy design. Due to its limited scope and constraints, the focus will be on Karnataka. I am looking forward to talk to the policy committee members who have been engaged in the consultation process. I am also interested in understanding the perspectives of the stakeholders who have been consulted online/offline. Alternatively, if you are or know an academic/expert/journalist who is interested to study this space, please drop me a word or could you please connect me directly with them. I appreciate any support or guidance in this regard. Thank You in advance!

## Appendix 5: Oral Consent Template

**Introduction:** Hello [again], my name is XXX. I'm currently doing my master's degree at the University of Oxford in Department of Education.

- **Project details and aims:** In my study, I want to investigate the process of consultations in New Education Policy's (NEP) design. I'm interested in learning how a policy is designed bottom-up, who is consulted for the making of a policy and how is this consultation process conducted. I have learnt from my very humble primary study that you have been involved in NEP either as a consultant or a committee member. If you would be interested to participate in the research, this is how we will proceed with the study.
- **Interviews/ surveys/ tasks description:** I will share a set of interview questions with you after which we will have a one-hour conversation on Teams where these questions will be discussed. In the interview, I am interested to learn your role in the consultation process and the structure and quality of the process according to your own perspectives. There would be no questions relating to your race/politics or religion. There would be ample time for us to go over the broad structure of the questionnaire so that you can prepare beforehand the interview and the interview will be as smooth as possible. You have all the right to not answer questions that you are uncomfortable with and can withdraw<sup>1</sup> from the study at any stage in the interview. You could also withdraw any of the information shared during the interview later (the accurate date will be known in time and shall be communicated to you by the date of the interview) and avoid it from being quoted in the publication. The Teams meeting will be audio only for, confidentiality and privacy reasons and the call will be recorded. If you are uncomfortable with the call being recorded, I can alternatively take notes during the interview. All the data including the recorded call will be deleted after 3 years of the submission of the thesis. If you are uncomfortable with any of these, I am happy to discuss it with you and conduct the research in a way that's most fitting to your personal requirements.
- **Data sharing/ access/ confidentiality:** The data you give will form the basis of my master's thesis. Apart from me, my supervisor will also have access to the materials to some extent. The purpose of such a sharing is purely academic. The confidentiality/anonymity clauses will be respected by my supervisor and any other member who will be involved in the research on an academic role. All the storage folders will be password protected and will be kept with the University of Oxford IT Network to ensure the highest safety standards possible. The data will be completely anonymous and de-identified<sup>2</sup>. The data will be saved up to 3 years after the research and will be stored in encrypted, password protected cloud folders. Best possible measures will be taken to de-identify and ensure the non-traceability of the data. I understand that you are still/were involved with NEP at its development and you might have vested and/or genuine personal interests in protecting the reputation and perception of the policy. Firstly, the research is not interested in a political discussion of any sort. Secondly, as an ex-practitioner myself, I understand these nuances and commit to respecting your best interest at all costs and at all stages of the research.
- **Keeping contact details:** I would also like your permission to keep your contact details so that I can re-contact you to clarify information you gave me in your interview. I hope that

that is okay, and I trust that you will communicate any discomfort as and when we proceed.

- **Publication plans:** The project will be published in a thesis. The insights and discussions from the study would also be tentatively written as blog posts etc after the duration of this research. I am also hoping to present the insights in a conference. These are only aspirations at the moment, and you will be given complete information if and when the materials used in this research will be used later for similar objectives. All the clauses remain the same for such uses of data as well and you have all the right to accept or reject such requests from the researcher.
- **Complaints/ concerns procedure:** If you have any complaints or concerns, please feel free to contact me. My phone number is \_\_\_\_\_. You can also reach me at \_\_\_\_\_@gmail.com.
- **Ethics review details:** This research project has been reviewed and approved by an Oxford University ethics committee. The ethics reference is [Rxxxxx]. If, after contacting me with any concern, you're still unhappy and wish to make a formal complaint, please contact the ethics committee. Their email address is [ethics@socsci.ox.ac.uk](mailto:ethics@socsci.ox.ac.uk).
- (\*) **Data Protection statement:** The University of Oxford is responsible overall for ensuring the safe and proper use of any personal information you provide, solely for research purposes. Further information about your rights to information you provide is available from the University's [data protection website](#).
- **Questions/ concerns:**
  - Do you have any questions?
  - Do you give your permission for me to interview you/ audio record you?
  - Do you give me permission to quote you anonymously?
  - Do you give me your permission to store your data for 3 years?
  - Do you give permission for me to re-contact you to clarify information or for any other research-related discussions later?
  - Are you happy to take part?

Ok, thank you so much, let's start.

## Appendix 6: Researcher Record of Oral Consent

<p>Interviewee Name or Number (if anonymous participant):</p> <p>Meeting Number:</p> <p>Date:</p> <p>Time:</p> <p>Location (City / Region):</p> <p>Project Explained (Yes/No):</p> <p>Interview recorded or Notes Taken:</p> <p>Online platform used:</p> <p>Participant agreed to direct quotes (Yes / No):</p> <p>Participant agreed to quotes which would not identify them? (Yes/No):</p> <p>Participant is not to be quoted at all (Yes/No):</p> <p>Other:</p> <p>OPTIONAL: Signature of Researcher [INSERT NAME]</p> <p>(Signed in the presence of the interviewee to confirm oral consent):</p>
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## Appendix 7: E-Mail Consent Template



### E-MAIL CONSENT TEMPLATE

Please read the statements below. If you are happy with all the statements, please copy and paste them into an email and send it to me at \_\_\_\_\_@ox.ac.uk. This will be considered to constitute giving your consent to participate in the study.

If you have any questions about the research or the statements below, please do not hesitate to contact me.

I confirm that I have read and understood the information sheet for the study - *Stakeholder Consultations in New Education Policy (2020): A qualitative evaluation of consultations in India's Education Polycscape*. I have had the opportunity to consider the information, ask questions and have had these answered satisfactorily.

I understand that my participation is voluntary and that I am free to withdraw at any time (preferably at the earliest possible), without giving any reason, and without any adverse consequences or penalty.

I understand what will happen to my data. I understand that data collected during the study may be looked at by designated individuals from the University of Oxford. I give permission for these individuals to access my data. I understand who will have access to personal data provided, how the data will be stored and what will happen to the data at the end of the project.

I have been advised about the potential risks associated with taking part in this research and have taken these into consideration before consenting to participate.

I have been advised as to what I need to do for this research, and I agree to follow the instructions given to me.

I give the researcher(s) permission to interview me, and audio record me.

I give permission for the researcher(s) to quote me anonymously.

I understand that all my data will be de-identified.

I understand how this research will be written up and published.

I understand how to raise a concern or make a complaint.

I give permission for the researcher(s) to re-contact me for any research-related objectives.

I understand that this project has been reviewed by, and received ethics clearance through, the University of Oxford Central University Research Ethics Committee.

I am happy to take part in the research.

## Appendix 8: Interview Guide

The questions have been framed based on the research question and the points of interest of the study. This has been classified into 5 objectives:

- **Evaluation:** of the participant, their involvement with the policy and their own perception of consultations
- **Structure:** Nature of consultations, frequency, location, people involved. Questions of Who/What/Where/When will be studied here.
- **Systems and Processes:** studies the Frameworks, SOPs, monitoring etc in place before/during/after the consultations to learn the preparedness, method and implementation of consultations. Here questions of Why/How are crucial.
- **Quality:** studies the value of consultation as expressed by the different stakeholders. Questions such as *What was the outcome? What worked? What did not? What can we learn from this exercise?* Will be investigated here.
- **Resources:** Resources utilised and contributed to the design and implementation of consultations. This helps us study the infrastructure and support that allowed or discouraged the conduct of consultations.

Group 1 Interviews: Policy committee members/ Public Managers or administrators

Sl.No	Question	Objective of the question
Unique identifier number		
<b>Before consultation</b>		
1	Role of involvement with the NEP consultation (Lead/ Assistant/Support staff etc.)	Evaluation
2	Do you believe consultation should have been a part of the NEP design? Why? Why not? (Objectives)	Evaluation
3	Are you aware of why and how you were selected as a consultant?	Systems and processes
4	Were you trained on the process before? If yes, by whom and for how long? Could you elaborate on what the training consisted of? If not, why do you think was that the case?	Resources

5	Was there a plan/ framework for every consultation meeting or was it context and person dependent?	Systems and processes
6	How many consultation sessions did you conduct? Where did these sessions take place(states/districts)?	Structure
7	Could you elaborate on your preparations before the consultation sessions?	Systems and processes
<b>During consultations</b>		
8	How many stakeholders and consultants were present in a session? Were there other members in these sessions?	Structure
9	What was the type of consultation that you were a part of? <i>Green papers, Online meetings, IN-person meetings</i>	
10	How long did one session of consultation last?	Structure
11	Where were the consultations usually held? (Schools, Public office rooms etc)	Structure
12	Could you elaborate on the step-by-step process/structure of a consultation session?	Systems and processes
13	How were stakeholders selected for each session?	Systems and processes
14	On average, what was the male-female distribution in these sessions?	Systems and processes
15	Would you say that the stakeholders were representative of the population in question? Why?	Systems and processes
16	Was there any system in place to record attendance of the members, capture minutes of the meeting etc?	Systems and processes
17	How would you describe stakeholders' perception of the consultation session before the session? Did they find it valuable? Why?	Quality
18	Were there any documents or materials provided to the stakeholders before the session?	Resources

19	How would you describe the general mood of the consultation sessions?	Quality
20	Were there any digital or other resources used in these sessions and how effective were they?	Resources
21	What worked well and what did not? Why? Why not?	Quality
<b>After consultations</b>		
22	How was the recommendations/ feedback from the stakeholders documented? What tools were used to collect and capture this?	Systems and processes
23	Do you believe stakeholders were eager and active participants? Why or why not?	Quality
24	Do you believe stakeholders' concerns were justly addressed? Why?	Quality
25	How would you describe stakeholders' perception of the consultation session after the session? Did they find it valuable? Why?	Quality
26	What parameters had you set to evaluate the success of the session?	Systems and processes
27	Were they achieved? Why? Why not?	Systems and processes
28	How was the stakeholder feedback added to the policy? Was there a process for the same?	Systems and processes
29	Did any consultation session that you were part of were continued or followed up later? Why?	Systems and processes
30	Were there any documents or materials provided to the stakeholders after the session?	Resources
31	Do you believe the consultations were meaningful? Why/Why not? How would you rate them?	Quality

Group 3 Interviews: Expert/Academics/Journalists

Sl.No	Question
Name of participant Unique Identifier Number Age Organization/ Independent association with NEP Location Email Phone	
1	Role of involvement with the NEP consultation <i>Consulted at village/town/district/state level</i>
2	Do you believe consultation should have been a part of the NEP design? Why? Why not?
3	Do you believe the consultations were meaningful? Why/Why not? How would you rate them?
4	In your knowledge, why did the committee hold consultations? What were its objectives?
5	In your knowledge and research, what has worked well in the consultations?
6	In your knowledge and research, what has not worked well in the consultations?
7	What do you believe is the biggest challenge of conducting consultation? Do you believe our team of policymakers was prepared for this? Why and how?
8	What do you believe are the advantages of holding consultations? Do you see that reflected in the policy? Why and how?
9	Are you familiar with the details of consultation as outlined in the draft and final policy?
10	Do you believe that the theoretical outline was implemented in practice? Why / why not?
	Anything else you would like to share?

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