

Report on Policy Dialogue

**Private Sector Education:
Policy and Regulatory Issues**

August 29, 2008
Islamabad



**Institute of
Social and Policy Sciences**



Campaign for Quality Education (CQE)

Introduction

Private sector education is a rapidly expanding phenomenon in Pakistan. According to the latest National Education Census, the number of private educational institutions had risen to 81,103 in 2005 from 36,096 in 2000, thereby showing an average annual increase of 25%. According to another study, by the end of 2005, one in every 3 enrolled children at the primary level was studying in a private school. Besides, there has been a huge increase in the private expenditure in education which now stands at Rs. 36 billion annually. At the household level, the ones which opt for private schools at primary level spend 648% more than those which opt for public schools at the same level. The growth in private educational institutions of higher learning too has been astounding: the private sector universities and Degree Awarding Institutions (DAIs) witnessed a 400% growth from 1996-2006 as their number increased from 11 to 55. These figures highlight the critically important role that the private sector has assumed in the educational landscape of the country.

This expanding role of private sector in education has raised several issues, particularly those of quality and equity. From the standpoint of quality, the private schools, though marginally better than the government schools, fall short of reasonable standards of learning achievements and quality education. Similarly, in the case of private sector universities/DAIs, there is no clear evidence to suggest that these, with a few exceptions, are providing the students with quality and services commensurate with the fees they are charging. The miserable state of IT industry in Pakistan, notwithstanding the huge investment made by both the public and private sector in it, and the country's extremely poor showing on Global Competitiveness Index are two of the several indicators that underline serious implications of our neglect of higher education for the economy and polity of Pakistan and call for a national response.

Cognizant of this reality, the government has introduced various regulatory frameworks to ensure quality education by a vibrant private sector. Among these, two comprehensive regulatory regimes are particularly worth examining; one is for the Islamabad Capital Territory (ICT) private schools and the other is for the private universities/DAI implemented as the core regulatory function of Higher Education Commission of Pakistan (HEC).

The functioning of these regulatory regimes however does not appear to be effective as we are sliding further down by every passing day. Recent report of the Federal Public Service Commission (FPSC) on the quality of the candidates of Central Superior Services (CSS) is an eye opener. According to the report, during the year 2007, 243 posts in Basic Pay Scale 16 to 20 could not be filled due to non availability of qualified candidates. It appears that there are serious problems with the designing and functioning of regulatory instruments developed through HEC and ICT Private School Regulatory Authority to ensure quality. There is an urgent need to critically evaluate these regulatory frameworks to identify all the possible causes that have hindered their effective implementation and to find ways and means to strengthen these regulators.

Keeping the above in view, the Institute of Social and Policy Sciences (I-SAPS) and Campaign for Quality Education (CQE) held a policy dialogue with various stakeholders to discuss the existing state of affairs in private schools and higher education vis-à-vis the relevant regulatory regimes and finding ways to improve them. The dialogue was held on August 29, 2008 at Marriott Hotel Islamabad.

Objectives of the Policy Dialogue

The policy dialogue was organized to:

- Stimulate evidence-based debate on the complex issue of the regulation of private sector educational institutions;
- Analyze available regulatory framework to see how robust they are in addressing concerns about private sector education;
- Evaluate the level of compliance with the regulations;
- Discuss how can the regulatory frameworks be improved to be responsive to the needs of all stakeholders and, at the same time, ensure quality education;
- Identify and prioritize the areas of further research.

Speakers & Discussants

Speakers: Mr. Abbas Rashid (CQE); Dr. Salman Humayun (Executive Director, I-SAPS); Mr. Kashif Mumtaz (Research Fellow, I-SAPS).

Discussants: Col. (Rtd) Muhammad Ashraf, (Secretary Islamabad Capital Territory Private Educational Institutions (Regulation and Promotion) Regulatory Authority); Dr. Riaz Hussain Qureshi, (Advisor Quality Assurance and Learning Innovation, Higher Education Commission); Dr. Faisal Bari, Professor of Economics, Lahore University of Management Sciences.

Proceedings of the Policy Dialogue

Welcome Note

Dr. Salman Humayun, Executive Director I-SAPS

Dr. Humayun welcomed all the participants of the policy dialogue. He explained the background and objectives of the policy dialogue. He said private sector education, and particularly its attendant regulatory issues were an under-researched area. There was, he said, an urgent need for serious debate and research on this area from the public policy point of view. The dialogue, he said, was an effort towards that end. He introduced the speakers and the discussants of the dialogue.

Private Educational Institutions: Issues of Quality and Equity

Mr. Abbas Rashid, CQE

Mr. Rashid reflected on “Private Educational Institutions: Issues of Quality and Equity.” He began by discussing the philosophy of education; whether it was public or private

good, noting that education inherently serves both public and private interests. It addressed public interests by preparing the young to assume adult roles in which they could undertake civic responsibilities, participate in a democratic polity with a given set of rules, and embrace the economic, political, and social life which constituted the foundation for the nation.

While commenting on private choice, Mr. Rashid mentioned the debate about whether it was parents' right to choose the type of education they wanted to expose their children to or was it the right of a democratic society to use the educational system as a means to reproduce its most essential political, economic and social institutions and ethos through a common schooling experience. He added that in Pakistan's context, it was also a matter of being able to afford the choice and to be fully informed as to the nature of the choice being made. The real challenge, he said, was that of preserving the shared educational experience necessary for establishing a common foundation of knowledge and values that was crucial to reproducing the cherished economic, political, and social order (public goals), while allowing some range of choices within that to meet private goals.

He proceeded to highlight the increasingly important role that the private sector had assumed in educational landscape in the country. Citing the National Education Census 2005, he said there were 245,682 educational institutions in the country, out of which two-thirds were public and one-third were private. The percentage of private institutions was 42% (Punjab), 28% (NWFP) 21% (Sindh), 15% (Balochistan), 34% (AJK) and 55.6% (ICT). However, he emphasized, in Pakistan's case, what was more relevant were the issues of quality and equity that pertained to the private sector and their eventual consequences for societal integrity and development.

In this regard, he said, there was no clear evidence to suggest that private sector universities/DAIs, with a few exceptions, were providing the students with education commensurate with minimum standards. According to Mr. Rashid, one reasonable measure to gauge quality could be the quality research produced by private institutions of higher learning or its absence and the number of educated un-employed.

He told the audience that according to the National Education Census 2005, out of 122349 primary-level institutions, 86% were in the public sector and 14% were in the private sector. At the middle level, out of 38, 449 institutions, one-third were in the public sector and two-thirds were in the private sector. At the secondary level, out of 25,090 institutions, 42% were in the public sector and 58% were in the private sector. He noted that though public schools dominated at the primary level, the student share of private sector schools even at this level was around 30%. Describing the rise of private schools, he said that the number of private schools in the four provinces had risen from 3,300 in 1983 to 32,000 in 2000 - an almost ten-fold increase in less than two decades.

Following this, he discussed 'Input and Process Issues' with regard to private schools. He said private schools witnessed high teacher turnover because the efficiency was ensured through maximizing insecurity as there was no contractual security available for the teaching staff at the private schools. The teachers at these schools, he added, were under-

qualified with a content as well as a training deficit. Infrastructural provisions were inadequate at these schools. He said, barring few exceptions, the private schools, though marginally better than the government schools, fell short of reasonable standards of learning achievements and quality education.

He saw a problem assessing the quality of education in private sector schools given that private school students also appeared at key stages for the same exams as government school students. As these exams, he said, were more a test of memory rather than anything else, they were not very useful in assessing knowledge and skills. Another issue, he identified, was that the majority of private schools catered to low income groups often serving households where parents having minimum schooling themselves have difficulty distinguishing between schooling and education. Though, Mr. Abbas said, the same could be true for public schools but obviously the private sector was better at marketing its product.

Discussing the equity issue, Mr. Rashid commented that private schools did not cater to the lowest income groups or to populations in remote areas. That is why, he said, while Punjab had the highest incidence of private schooling, rural Sindh and Balochistan had the lowest. Private school prevalence, he added, was higher in urban than in rural areas and even though the incidence of private schooling had gone up rapidly in rural Punjab as well, private schools were likely to be concentrated in proximity to the better off settlements. He emphasized the need to be cognizant of the issues of quality and equity in the context of the private sector.

Mr. Rashid also discussed various models of Public-Private Partnership being tried to resolve the issues pertaining to both sectors: The adopt-a-school model was an example of private resources and management being employed to improve government schools, and schools in Punjab being assisted by the Punjab Education Foundation (PEF) was an example of private schools being supported by government funds.

Following this, Mr. Rashid presented an overview of PEF Foundation Assisted Schools (FAS) program. By way of illustrating the quality deficit in private sector schools he noted that 1085 schools had benefited from this program over 3 years. What was disturbing, said Mr. Rashid, was that less than 25% schools could meet the criteria regarding basic infrastructure and a QAT (Quality Assurance Test) sought by the PEF as a condition for providing the school Rs. 300 per child in lieu of the fee charged. He further said that for the current year, out of 3400 schools that had put in an expression of interest, only 855 - just about 25% - met the initial criteria. If past experience was to go by, he said, more than 50% would not meet the QAT requirement. He noted that in this context, the weakest links were English and Science---much the same situation as in public sector schools.

He viewed these figures as a clear indicator of private schools in significant numbers falling short in terms of quality, noting that while the Foundation was trying to help, clearly a large number of schools did not meet its minimum criteria. He wondered what education delivery we could expect of those schools in the private sector. The issue in

other words, he said, was not a public-private contest but the quality deficit in large sections of either sector.

To improve this state of affairs, he concluded, there was a need for a debate on the role of the private and public sectors in education, and for a regulatory and support regime for the private sector and an incentive and accountability system for the public sector.

Private Schools: Policy and Regulatory Issues

Dr. Salman Humayun, Executive Director I-SAPS

Dr. Humayun spoke on 'Private Schools: Policy and Regulatory Issues.' Setting the context of his presentation, Dr. Humayun mentioned various Sectoral Regulators that had been instituted/upgraded in the country in order to cope with the challenges emanating from the transition from State-owned services to market-based outfits. He noted that there had been an exponential growth in the number of private schools which had risen from 3,300 in 1983 to 81,103 in 2005. To present an elaborate picture of the whole sector, Dr. Humayun gave a breakdown of the number of private and public schools in various areas of the country, showing that 33% of all schools in the country were privately-owned. He also mentioned the huge increase in the private expenditure in education which now stood at Rs. 36 billion annually. He noted that the households which opted for private schools at primary level spent 648% more than those which opted for public schools at the same level. He also raised the issue of national preparedness with respect to opening up of trade in services under General Agreement on Trade and Services (GATS). However, he said, the government seemed unresponsive to the Challenges of this Transition.

Following this, he discussed how the private school education had been treated in various education policies since 1947. He said that the First and Second Educational Conferences in 1947 and 1951 respectively put premium on private education to share the burden of the government. In 1953, when there was agitation in Karachi for reduction of fees, government introduced grants up to 50% of the deficit caused by such reduction in fee. However, he said, the Education Policy of 1972-8 announced to nationalize all privately managed schools and colleges from the first day of September 1972. The policy was reversed with the National Education Policy 1979 which declared that "the existing legislation on nationalization of schools will be suitably amended to allow private sector ...and to ensure it will not be nationalized in future." The National Education Policy 1992, he noted, reiterated government's resolve to engage the private sector: "The government is looking forward to a richer participation of private sector."

Dr. Humayun also discussed National Education Policy 1998-2010, which contained many clauses to regulate as well as incentive the private sector. These clauses were about the establishment of regulatory bodies at different tiers, tax rebate for private schools, and admission in private schools of 10% talented students free of charge. However, he said, the implementation of these policy stipulations remains a question.

Following this, Dr. Humayun discussed Islamabad Capital Territory Private Educational Institutions (Regulation & Promotion) Ordinance XXII of 2006. Commenting on Section 1 (3), he said instead of providing for the Ordinance coming into force at once, it should have been given a gestation period of one year so that the regulator and private institutions could adapt to its provisions. Reflecting on Section 2(e), he said the Ordinance dealt with educational institutions imparting education up to intermediate level, whereas HEC dealt with universities, which meant the degree/post graduate colleges were left out of the purview of both the regulatory frameworks. However, he added, these colleges were dealt with by the rules and regulations designed by their respective provincial governments. Discussing Section 2(h), he said the proposed definition of a private institution was not comprehensive as it did not cover certain institutions, which were not considered government institutions either. In this regard, he gave the example of Overseas Pakistanis Foundation School.

Reflecting on Section 4, which described *Aims and Objectives*, he noted that there was no reference to quality, as was the case with the Preamble. Though circumstantial evidence could be construed as referring to quality, he argued, such a fundamental point should have got more salience in the document. About Section 4(c), which sought uniform policy about terms and conditions of the services of the teaching staff, he said such things should have been left to the market forces. He viewed this clause as micromanagement which should not be the function of a regulator. About uniformity of academic standards (Section 4 (C)), he noted that these standards were not well-defined. He wondered, to make this ambiguity clear, if these would follow the standards of the public sector schools. Commenting on Section 4 (f), he said though providing professional guidance seemed to be a good idea, there was a risk that it would dilute the regulator's efforts at regulating when it would involve in capacity building of the private institutions. Discussing Section 5(h), he wondered how the Authority would ascertain that fees were commensurate with the services in the absence of any benchmarking to guide this kind of exercise.

Discussing Section 9, which dealt with the *Funds*, he strongly criticized the rationale of creating the Regulatory Authority as a self-financing body, whereas all other regulatory bodies had been given seed money. He was of the view that the responsibility to regulate the private sector rested with the public sector and it had to shoulder the burden for carrying out this responsibility. This provision, he feared, would make the Authority develop a propensity of charging private schools fees just to ensure its own functioning. And the private schools, he said, would pass the burden on to the students. He appreciated Section 13 (3), which stated that every Institution or its branches running under the same management or name at different premises should be registered separately. He also appreciated Section 16 (2) which stated that on cancellation '... the Authority may make such orders or take such actions with respect to the completion of the current education term.'

Discussing Section 17, he criticized the rationale of powers to hear appeal against the Authority being given to the Secretary, Ministry of Education. Explaining his argument, he said, this would negate the whole concept of regulation. The regulatory bodies should

always be independent of their respective line departments, so that they could perform their functions without any hindrance. He also noted that in the Ordinance there was no room available for judicial process for anybody aggrieved by the Authority (Section 20). He objected to the provision of penal penalty in the Section 19, arguing in such cases imposing penal penalties was not a desirable course of action. Dr. Humayun also objected to the Section 21, which gave indemnity to any official acting in good faith, arguing that such clauses could induce officials to indulge in reckless behaviour.

Dr. Humayun also discussed the Private Educational Institutions (Registration, Regulation and Promotion) Rules, 2006. On Section 5(g), which stated that ‘management shall feel sensitive to the parents’ economic position’ when levying fees, he termed it as very vague and unenforceable. On Section 5(h), he mentioned that there was talk of required standards but nowhere were these delineated. Regarding security and inspection fees, he feared ultimately these would be passed on to the students. In his comments on Section 23, he pointed out that the government officials were given indemnity for their deeds of commission or omission under the ‘good faith’ clause, but no such indemnity was extended to the heads of private institutions.

Pointing towards the frequent amendments made in Section 5(r) regarding the change in the fees charged by the Authority for its services, he said it showed there was an ongoing negotiation process between the Authority and the private school owners, but parents seemed to be missing in the whole scenario. He suggested that in devising such rules, concerns of parents should be given primary consideration and their views should be solicited in a formal way.

In the end he suggested that public policy needed to be responsive to developing a robust regulatory framework that is responsive to all stakeholders. He demanded adequate public funding for regulatory bodies. He said good piloting was required in ICT. He also drew attention towards the need to address design issues.

Private Universities/Degree Awarding Institutions: Policy and Regulatory Issues

Mr. Kashif Mumtaz, Research Fellow I-SAPS

Mr. Mumtaz, talked about “Private Sector Higher Education: Policy and Regulatory Issues.” He started by highlighting the critically important role that the private sector had come to assume in higher education in the country, noting that the number of private universities/degree awarding institutions had risen from 11 to 55 from 1996-2006, showing a 400% increase. This, he added, was in sharp contrast to the public sector which registered only 100% growth in the corresponding period. The private sector, he added, accounted for 22% of total enrollments in higher education in the country.

The rapid expansion of the sector, he said, had also brought to the fore several related issues such as the narrow disciplinary focus of most of the private IHEs. HEC rules which allowed only not-for profit institutions, and the inability of various regulatory frameworks to cope with the challenges emerging from the opening up of trade in services under GATS.

Mr. Mumtaz proceeded to delineate the policy stipulations vis-à-vis private sector higher education, by discussing the National Education Policy (1998-2010) and HEC's Medium Term Development Framework (MTDF). Both the documents, he said, strongly supported private sector's role in higher education and vowed to encourage, facilitate, and incentivize the private sector. Both, he said, also showed a realization of the need to regulate the affairs of the private IHEs to ensure that they met minimum prescribed standards.

He viewed the formation of HEC as the government's response to the prevailing challenges in the field of higher education in the country, and tried to underline this by discussing HEC's core functions according to HEC Ordinance 2002 (Section 10). He criticized the clause (y), subsection (1), section (10): *To collect information and statistics on higher education and institutions as it may deem fit and may cause it published*, commenting that instead of *may cause it published* the Ordinance should have made it compulsory for HEC to publish the said information so that students could make an informed choice.

The response, he lamented, had not been successful. He cited three examples to corroborate his argument: the miserable state of IT education in the country, Pakistan's extremely poor showing at the Global Competitiveness Index (Pakistani stood at 92nd position out of a total of 131, and at 116th in case of higher education) and the case involving Bahria University and the Competition Commission of Pakistan.

The case of IT education, he explained, was particularly relevant as in this sector there was an overwhelming presence of private sector (93% of all IT institutions were private, which catered to the 97% of entire enrolment in the IT institutions in country). However, he said, these institutions which were churning out almost 20000 IT professionals annually had not been able to contribute much to the national economy. Pakistan, he added, could earn only \$116 million in 2006-7 as compared to the Indian IT exports of \$36.65 billion during the corresponding period. He further informed the audience that the Pakistani IT graduates' salaries were only 30% of those of their Indian counterparts. Though, he emphasized, several other factors too were responsible for this huge gap, the low quality of Pakistani IT graduates had been cited by some as one of the reasons.

Following this, he briefly discussed the Bahria University's case wherein it was stopped by the Competition Commission of Pakistan from making it mandatory for new students to purchase laptop computers which the university had itself imported. He opined that the case showed our national unpreparedness to cope with the challenges emanating from the transition from a state-controlled to a private business dominated education market.

He proceeded to discuss HEC's Ranking Criteria for the national universities. He said notwithstanding some deficiencies and controversies surrounding the practice, the ranking still was a useful tool to evaluate the performance of the universities and helped the students in making an informed choice. HEC's ranking, he said, was particularly

important as it was in the fulfillment of one of its core functions that is evaluation of higher education (HEC Ordinance: Section 10; subsection 10).

He discussed the Ranking Criteria in detail making observations about certain clauses which he deemed to be in need of improvement. He was of the view that the weightage assigned to various indicators needed to be redesigned. Commenting on the category of *Students* which carried an overall weightage of 17, he observed that HEC appeared to be concerned more about quantity than quality. He noted that there was no consideration for student satisfaction, and that a vague term *student selectivity* had been given inappropriate weightage of 5.

About *facilities* (weightage 15), he observed again an infatuation with numbers. Instead of numbers of books, he suggested, more weightage should have been attached to the relevance of books. He also recommended less weightage for bandwidth per student. On *finances* (weightage 15), he said, allocation of a weightage of 4 and 5 respectively for recurring, non-recurring expenditure/student was problematic. The institutional arrangement in place, he reasoned, did not allow the top university officials to make amendments in these expenditures if they wanted to improve their scores on these accounts.

On *faculty* (weightage 27), he said, the weightage given to the trainings received and awards won by the faculty should have been differentiated on the basis of whether these awards/trainings were national or foreign. He also questioned the logic of giving separate weightage to full time PhD faculty and ratio of PhD faculty to total faculty. On *research* (weightage 26), he described the weightage of 1 given to the number of research journals published by a university as too little. He also made some general comments: individual programs were not ranked; ranking was done only once; graduate prospects should be taken into account.

Following this, Mr. Mumtaz discussed other tools employed by HEC for quality assurance. He discussed the role of Quality Assurance Agency and the Quality Enhancement Cells (QECs) at various universities. He noted with concern that despite enormous funds at its disposal HEC had yet to establish QECs at all public universities. Private universities, he said, were altogether left out of the purview of QECs. He emphasized the need to recognize that quality was not a monolithic phenomenon and had to be viewed in terms of final outcomes.

He also discussed HEC rules for the establishment of new universities/DAIs. He said the financial requirements for the establishment of new universities/DAIs in the private sector were prohibitive. These were, he said, Rs. 200 million for a private university, and Rs. 50 million for a DAI. He also noted that the existing rules allowed only not-for-profit institutions in the higher education sector and wondered how anyone could make so huge an investment in a not-for-profit venture. He underlined the need to remove this anomaly.

Summing up his main arguments, he said that government appeared to be cognizant of the need for a burden-sharing by the private sector, and to regulate their affairs. It had, he

added, promised to incentivize the establishment of private IHEs. The success of government initiatives, he said, remained a question at both fronts.

In the end, he suggested that the tools for evaluation needed to be beefed up, and the mandate of sector regulators needed to be clearly defined. He also suggested that the investment in private sector needed to be thought through in view of opening up of markets under GATS and regulations improved accordingly. All such steps, he emphasized, should be aimed at contributing to quality education keeping in view the challenges of knowledge economy and global competitiveness.

Discussants

Col. (Rtd-) Muhammad Ashraf, Secretary Islamabad Capital Territory Private Educational Institutions (Regulation and Promotion) Regulatory Authority.

Col. Ashraf started by describing the circumstances that led to the establishment of the Authority. He shared slides with the audience showing the aims and objectives of the Authority and its performance since its inception. He also informed the audience about the aims and objectives of Regulatory Authority, which he said, were to register, regulate and promote privately managed educational institutions in ICT to ensure a uniform policy up to Higher Secondary School level regarding various indicators. These indicators included curricula, duration of academic sessions, holidays and vacations in lines with government scheme of studies, qualification of teachers and their terms of service, academic standards and evaluation of institutions, and promotion of co-curricular activities on inter-institutional basis.

He informed the audience that there were total 620 private educational institutions in the ICT which were registered with the Authority, with 242 in urban areas and 378 in rural areas. Total number of students, he told, was 133,349, out of which 76,063 were boys and 57,285 were girls. The total enrollment was almost equally divided between the rural and urban schools. He also spoke about the Authority's future plans which included teachers training on regular basis, evaluation of the institutions and their categorization on the basis of performance and facilities being provided to the students, improving the standards of education by conducting centralized examinations at primary and middle levels, acting as a guide/buffer between the stakeholders, and to discipline the system.

He said that it was due to relentless efforts of the Authority, that it succeeded in getting the private schools in ICT registered, even though it lacked sufficient funds and logistical support. In this context, he lauded the role of the Authority's Chairman, Commodore (r) Sharif Shamshad, declaring him to be a visionary who had been working tirelessly and sincerely for the cause of education. He said the commitment of the Regulatory Authority was to facilitate the promotion of private educational institutions in achieving academic excellence and not to interfere with their functioning. That was why, he said, so far no institution had been denied registration. He emphasized that the Regulatory Authority was functioning effectively and efficiently within the framework of existing rules and regulations; however, if there were any suggestions for the improvement of any clause,

they would be welcomed. In the end, he appreciated the efforts undertaken by I-SAPS and CQE to promote quality education.

Dr. Riaz Hussain Qureshi, Advisor Quality Assurance and Learning Innovation, Higher Education Commission (HEC)

Dr. Qureshi started by presenting the scope and coverage of HEC. He said that by definition ‘higher education’ meant education beyond 12 years of study, which was being dealt with by colleges and universities. HEC covered the universities, whereas the colleges fell under provincial governments’ purview. He noted that prior to the formation of HEC, no mechanism was available with its forerunner, University Grants Commission, to ensure quality in the higher education institutions. Quality, Dr. Qureshi explained, was not a monolithic phenomenon; it had various components – faculty, students, facility, research etc, and needed to be approached by addressing all these issues concurrently. Faculty, he said, was of prime importance among all these components. That was why HEC put highest premium on improvement of the quality of the local faculty, which was manifest from the fact that 55% of all HEC spending had been allocated for this purpose.

Dr. Qureshi proceeded to discuss HEC’s Ranking Criteria of national universities. He said in most of the developed countries, the ranking was generally done by the private organizations or by newspapers. HEC too, he told the audience, had requested some major media groups to undertake the task, but they hesitated due to their limitations. After that, he said, HEC itself undertook the task. He also described various problems HEC had to encounter in undertaking this exercise. He cited the absence of any precedence to follow as a major problem. He also said that universities had traditionally been jealous in guarding their autonomy, and thought that quality assurance was the responsibility of the universities themselves and no one from outside had any right to guide them. Therefore, he said, HEC had found it difficult to get required cooperation from most of the universities. Despite all odds, he said, HEC proceeded with its plan and got it accomplished.

He also described briefly the whole institutional efforts that went into accomplishing this exercise. The ranking exercise, he explained, was conducted on the basis of extensive information supplied by the Public and Private Universities and Degree Awarding Institutions. The methodology adopted was developed by the Quality Assurance Committee of HEC through a transparent consultative process in which various leading international ranking practices and systems were analyzed. The ranking model proposed by the QEC was developed through extensive stakeholder participation, tailoring the process according to the ground realities of the higher education sector in Pakistan. The final methodology proposed by the QEC was presented to the Commission of HEC for further scrutiny and approval of the ranking criteria.

The process of data collection for the ranking exercise, he added, was implemented specific to the ranking criteria approved by the Commission. An extensive questionnaire was developed and sent to all universities for completion. On receipt of the data from the Universities, HEC conducted an exhaustive process of vetting to ensure that the data

provided by the universities was indeed accurate. The data collected through this exercise was processed through the ranking methodology to obtain preliminary ranking lists for universities. The rankings generated through this process were presented to the Ranking Board, a Board of eminent educationists constituted by the Chairman of HEC under the directive of the Prime Minister, for final review and approval.

Dr. Qureshi also responded to some of the issues raised by Mr. Kashif Mumtaz vis-à-vis HEC's Ranking Criteria. He said HEC concentrated only on the targets which were easy to accomplish in the first round. The ranking exercise, he said, left the tasks, which were difficult to accomplish in the short run like measuring 'student satisfaction' and graduate employability, to be measured during the subsequent exercises. Regarding an observation about the apparent duplication in the Ranking Criteria in assigning separate weightage for the full time PhD faculty and the ratio of PhD faculty to total faculty, he said it was devised to give universities due weightage by taking into consideration the relative strength of their faculty. For example, he explained, a small university might have a small number of PhDs as compared to larger universities but it might have a higher ratio of PhD faculty to full time faculty, and accordingly should get separate weightage. He shared the importance of having program wise ranking and informed the audience that the upcoming ranking would be program wise. About the delay in the next ranking, he said it was due to some problems in getting required information from universities, but the Commission was working on it and it would be published soon.

Dr. Qureshi also spoke on the issues raised vis-à-vis HEC's quality assurance mechanism. He discussed the formation of various Quality Accreditation Councils by HEC to ensure quality across the entire spectrum of professional education in the country. However, he said Quality Enhancement Cells (QECs) at various universities, facilitated by HEC, were meant to provide universities with a tool for self-assessment. He said HEC was trying to arrange funds to establish QECs at private universities as well.

Dr. Faisal Bari, Head of Department, Economics, Lahore University of Management Sciences

Dr. Bari started by elaborating the concepts of public good and public interest broached by Mr. Abbas Rashid in his opening presentation. He said education was a public good in the sense that it was the state's responsibility to provide it to all regardless of whether anybody could pay for it or not, the underlying idea being that if a child was educated the benefit of his education would accrue to the whole society.

Dr. Bari cautioned against the blanket application of regulations arguing that the underlying assumption of introducing a regulatory framework was that market was not properly working, but we should be careful in deciding whether certain aspects needed to be brought under the purview of regulations. But, he added, at the same time we saw distortions in the market in terms of fees etc.

Regarding the ICT Private Educational Institutions (Regulation and Promotion) Regulatory Authority, Dr. Bari wondered how could only the private schools be subjected

to a regulatory framework and emphasized the need for having such frameworks for both the public and the private institutions. He also pointed towards the same authority being assigned competing tasks of promoting the private educational institutions on the one hand and regulating the same on the other. Noting that the accomplishment of both the tasks could require adopting different, at times competing, strategies which could be difficult for an organization to handle, he advocated for the bifurcation of duties among two independent organizations with one assigned to promote the private educational institutions and the other to regulate the same.

He proceeded to comment on the case involving Bahria University wherein it was stopped by the Competition Commission of Pakistan from making it compulsory for the new students to purchase laptop computers that the university had imported. He was of the view that it was neither due to the inefficiency of HEC as a regulator nor due to a loophole in HEC's regulatory framework: it was rather a case of overlapping jurisdictions among different regulators – a phenomenon which will be increasingly visible in the days to come. Elaborating his point, he said regulators needed to be seen along the core functions they were supposed to perform and not along the sectoral lines. For example, he explained, if there was a monopoly related concern in a given sector, it would be taken care of by the Competition Commission and not by the regulator of that particular sector. This, he said, had been provided for in the ordinance of the Competition Commission of Pakistan.

Discussion:

The above comments were followed by a lively discussion in which the participants showed keen interest. Pertinent remarks were made and serious questions were asked by the participating school teachers, private school owners, child developers, and representatives of CSOs. Some of the salient points raised during the discussion were:

- Dr. Muhammad Afzal Babar (Private Schools Network) said that since 1947, no serious effort had been undertaken to promote education. He lamented that although there had been various schemes to promote literacy in the country like Iqra Surcharge, National Commission for Human Development etc., none had been able to pay any dividends. He said the rapid expansion of private sector educational institutions was the result of gap between demand and supply of educational services as the government sector failed to fill this gap.

Dr. Babar wondered why the government was taking so much pain at 'regulating' a sector which had been sharing its burden. He criticized the decision to institute ICT Private Educational Institutions Regulatory Authority as a self-financing body, noting that it had not been given even the seed money which was the main cause behind its inability to carry out assigned duties in an efficient way. To prove his point, he said there had been no repeat visit to any school by the Authority officials in last two years.

- Another participant was, however, of the view that there is urgent need of regulating private institutions.
- Another participant criticized the politicians for lacking political will to improve the system of education in the country. He said politicians had been making tall promises to improve the education system but would always forget them when in power. He said since no politician would send his children to a public school, they were least bothered by the dismal state of affairs in these schools.
- Mr. Riaz Fatyana, Member National Assembly, in response to these comments, said politicians had to share the blame for the miserable state of education in the country. However, he said it would not be fair to put entire blame at politicians' doors since they had not been in command for most of the time since independence as the political process had ruptured time and again. He however promised to mobilize his fellow legislators to get a considerable increase in public spending on education.
- One of the participants questioned the very logic of regulating private institutions, arguing that 'survival of the fittest' will ensure that only those private institutions remain in the market which provide quality education. He said consistent poor showing of a private institution over a period of few years, reflected in its graduates' unemployability, will automatically lead to its closure as no one would be willing to go to such institutions.
- Mr. Abbas Rashid said usually the deterioration of standards of an institution takes place over some time, and it is after that the people come to know about its true worth. In the absence of a regulatory framework, several generations of students who will be attending this institution in this period will suffer. The regulation of private institutions therefore, he argued, cannot be left to the choice of students.
- Dr. Bari endorsed Mr. Rashid's point and said the information flow about educational standards was very weak in Pakistan. Secondly, not all the parents were in a position to make an informed choice about which institution to choose for their children. Hence, he said, there would always be a need for a regulator to enable people to make informed choices.
- Another participant criticized ICT Regulatory Authority's plans for teacher training saying that this should be the task of some education college and not that of a regulator.
- One of the participants pointed out that there was no mention of early childhood training. In fact, she said, the idea of child development has not been able to gain currency in Pakistan. This, she said, was dangerous as all the schools, colleges and universities will be getting students who had not been properly developed at that crucial stage because, she quoted, what a child is at 6, she will be at 60.

Vote of Thanks and Way Forward

Dr. Salman Humayun, Executive Director I-SAPS

At the end of the policy dialogue, Dr. Humayun expressed his gratitude and appreciation for the speakers, discussants, and the participants for their active participation and enlightening discussion. He hoped that the issues raised during the dialogue would stimulate greater interest in this so far under-researched area. He also hoped the dialogue would bring home the need for a robust regulatory framework equipped with effective implementation tools to ensure quality education in both private and public educational institutions of the country. He urged the ICT Private Schools Regulatory Authority to take steps beyond school registration to ensure quality education for their students. He underlined the need for more research to deal with the issues emanating from opening up of trade in services under GATS. In the end, he said the task of ensuring quality education for Pakistani children was huge and urged all the stakeholders to work in unison with each other to get the task accomplished.