

Redefining University Education in India: Pedagogy and Student Voices

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INTRODUCTION

Universities are not only centres of knowledge creation and transmission but also play a significant role in nation-building process. Universities are integral part of a society and their constant interactions shape the very trajectory of higher education in a country. This symbiotic relationship between the two entities shapes the nature of knowledge production in more ways than one. Over the last two decades, Indian higher education has witnessed a paradigm shift with the changing profile of the student population increasing the diversity and bringing with it multiple layers of complexities. These complexities unfold in several ways in different campuses creating interesting sites of research in the realm of higher education in India. Against this background, examining the trajectory of university education in India in consonance with their changing roles and responsibilities towards sociopolitical aspirations of the country is critical.

Traditionally, universities in India were established with a focus on promoting “freedom of thought.” The centres of higher learning in the subcontinent, like Taxila (fifth century BC) and Nalanda (sixth century BC), thrived in a climate of eclecticism, freedom, and cross-cultural

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knowledge-sharing, spanning not just religious studies but also other arts and science subjects. This has provided impetus to the real and native philosophy of universities in India.

Transformation from the traditional ethos and functions of the universities was substantial during the colonial period. The Westernized construct of universities established by the British rule in India in 1857 at Madras, Calcutta and Bombay, were institutional transplants from Great Britain (Basu 2012). It was believed that such a project of Westernisation was to connect Indian education to European knowledge; to transmit the cultural values specific to Britain and Europe and to make available to the “raj” a class of clerks and bureaucrats (Aggarwal 2004). Macaulay in his minutes on Indian education in 1835, described the purpose of the universities in India was to produce “a new generation of English-speaking Indians—loyal to the British crown—to act as an army of clerks” (Evans 2002).

At the systemic level, the role and relevance of higher education in India has witnessed series of reforms. In this context, it is critical to examine the definition and re-definition of pedagogy in university education system as a result of transformations in the changing profile of students, given the various opportunities and challenges in the overall higher education setup.

According to Wells and Edwards (2013) in “Pedagogy in Higher Education,” the purpose of higher education, traditionally, was two-fold: first, to provide advanced education in the disciplines that support the existing order by maintaining existing knowledge and transmitting the same to succeeding generations; and, second, to offer opportunities for research, debate, and the extension of knowledge (Wells and Edwards 2013). There is a third purpose, though subtle, that has become increasingly important, namely to provide a forum for the articulation and critique of the values of societies that proclaim themselves to be democratic (Wells and Edwards 2013). Institutions of higher education and society are reflections of one another. Certain values and beliefs are dominant in our society and inculcated in these institutions within classrooms and beyond. The traditional teacher-centred knowledge dissemination process works at cross purposes in relation to the contemporary participatory mode of teaching and learning, wherein the experiences outside the classrooms are discussed within the classroom and vice versa. Arguably, the transformation of the purpose of university education and the changing profile of learners’ entering university spaces are the main drivers of reforms in pedagogy and consequentially its impact on social systems.

Across the globe, no pedagogical discourse is possible without serious engagement with “what is to be learnt,” “assumptions about learners and the learning processes.” Four aspects of pedagogy are articulated by a majority of those engaged with pedagogy and democratisation of higher education. These include validation of personal experience (Kolb 1982), participatory learning (Shor and Freire 1987), development of critical thinking and open-mindedness (Rimiene 2002), and encouragement of social understanding and activism (Warhurst 2006). Classrooms provide an interesting and critical domain for observing the transaction between teacher and the taught.

Scholars have engaged in examining this claim by describing classrooms as “a net of relationships balancing autonomy and mutuality” (Shrewsbury 1987) and “as an arena for students to contribute their voices to those of others as they investigate multiple views and perspectives” (Morrison 2008).

The changing higher education scenario in India reflects the tensions arising from the transformation from teacher-centred learning to learner-centred mode. As a result of this, the changing pedagogical practices focus on the experiences of the learner, enabling critical thinking and building perspectives through dialogue and debate.

CHANGING PROFILE OF UNIVERSITY AND ITS ACTORS IN INDIA

As mentioned previously, contemporary higher education, particularly in South Asia, is fundamentally influenced by its historical tradition. Majority of these are based on European academic models and traditions, largely influenced by colonial rulers, and in others cases by voluntarily adopted Western models (Altbach and Selvaratnam 1989).

On a similar note, higher education in India has transformed from erst-while elite to more inclusive domain, providing opportunities for many. The lack of access, equity and excellence are the core domains of crisis (Naik 1982) and eventually have been the key focus for suggesting reforms in addressing this crisis (Tilak 2013).

Post-independence particularly, the wave of affirmative action in higher education was a major movement. The struggle for equality of opportunity in higher education by marginalised communities resulted in the implementation of the Mandal Commission resulting in the raising of the social and political consciousness among the aspiring minds in the country (Agrawal and Aggarwal 1991). The entry of new actors—students

and faculty members—and the new typology of universities are some of the results of such systemic and ideological transformations.

Universities are seats of higher learning from where emerge the leaders of society in domains of science, arts, humanities and other fields of national life. The functions of the university are manifold—teaching, research and extension. A university's scope is national in character (University Education Commission 1962). The main purpose of establishing a university in a particular region is to make higher education accessible to all sections of the population within its territorial jurisdiction (University Education Commission 1962).

In the last two decades, higher education in India has undergone substantial expansion and has increased its institutional capacity several folds. At present the higher education sector consists of 33.3 million students (Gross enrolment ratio [GER] 23.6 per cent) in 710 universities as compared to 0.2 million students and up to 20 universities in 1950–1951 (MHRD 2016). GER for men is 24.5 per cent and women 22.7 per cent. The figures for Scheduled Castes is 18.5 per cent and for Scheduled Tribes¹ is 13.3 per cent (MHRD 2016).

At the disaggregate level, the Scheduled Caste students constitute 13.4 per cent and Scheduled Tribe students 4.8 per cent of the total enrolment. Other Backward Classes constitute 32.9 per cent of the students, and 4.4 per cent students belong to Muslim Minority while 1.9 per cent are from other minority communities (MHRD 2016).

In the last two decades or so, the Government of India (GoI) through its social welfare policy programmes has made several interventions to ensure primary and secondary education for all—the *district primary education programme, sarva shiksha abhiyan* (“education for all”). Arguably, such interventions are instrumental in increasing enrolment and reducing drop out at the school level. Consequent to this, the increased number of children completing school education in turn creates a huge demand for higher education in the country. Such an increase in enrolment is not merely a quantitative phenomenon but, more importantly, has resulted in the changing socio-economic profile of students accessing higher education, leading to a better reflection of the larger socio-economic-political landscape of the country aspiring for higher education in India. This expansion has espoused myriad demands from the stakeholders and the economy. As a result, the higher education sector has expanded several folds resulting in the creation of a complex typology of universities, with specific functions.

The typology of higher education providers are established with specific rationale. The state-led and funded universities—Central (42), Institution of National Importance (68), Public Deemed (49) and State universities (310)—are one the significant providers of higher education, with the mission of “access for all.” Juxtapose to this, the State Private (143) and Private Deemed universities (79), aspiring to deliver “quality” education, cater to those who can afford to pay for their education and/or those who do not get admission in public universities (MHRD 2016). It is interesting to note that there are many public universities known for their excellence in teaching, research and extension in the country. For instance, the JNU, New Delhi; the Indian Institute of Science, Bengaluru; the Indian Institute of Technologies; and Indian Institute of Management spread across the country, figure in top 200 world-class universities, emerging as leading public universities and university-like institutions. But these are few in number. In contrast, there has been an unprecedented increase in private universities and colleges which now account for approximately 65 per cent of the enrolment and 75 per cent of the total private higher education institutions (MHRD 2016) in India.

The country now claims to be the third largest system in the world after China and the United States in terms of enrolment, and the largest in the world in terms of number of higher education institutions (MHRD 2016). This expansion is characterised by “islands of excellence in a sea of mediocrity” (Altbach 2014).

The changing landscape of Indian higher education is beginning to witness changes with respect to increased inequalities through the several types of educational institutions—public and private. Notwithstanding these, leading public universities particularly have increasingly become diverse, mirroring the society and bringing with it the challenges of democracy and student voices on campuses. This has been largely facilitated by the affirmative policy.² While the democratisation of campuses is taking place across the country, the prestigious public universities have emerged as sites where the transformation is becoming illustrative of a larger movement with distinct student voices in the country. In the last one year, public universities have become a site of conflict between students and the government for being critical of the prime minister (Indian Institute of Technology, Madras) and the appointment of the chairman of Film and Television Institute of India (FTII), Pune. These conflicts have extended to government propagating caste-based allegations on student’s alleged anti-national expressions, leading to the Dalit student-leader to

commit suicide on the campus in HCU. More recently, the ongoing standoff between the government and students-faculty at the JNU, New Delhi to claiming rights over freedom of expression against the allegations made by the government of JNU students being anti-national are some of the instances of examining the relationship between the changing profile of the universities, pedagogy, and the actors of the university. To examine these linkages, the case of JNU is discussed in the following sections.

Unlike many public universities, JNU and its campus has been unique in many ways. It is one of the few universities that attract students from different parts of the country lending a national character to the students' profile. Over the years, the faculty of JNU has also acquired a national character. The university stands out from other universities in the country by its vibrancy and organic engagement with national issues. The university has been an active site for initiating deliberations and debates on issues of national importance and development. For instance, the role of the university in leading the anti-emergency movement and raising a call for democracy in 1970s; demands for reservations for the marginalised backward communities (Mandal Commission movement); against India's nuclear policy pointing to issues of natural hazards; critical about India's position on India's foreign policies and so on. This has resulted in national visibility of faculty and students voices.

For students, JNU has been an incubator for providing leaders in politics, bureaucracy, academia and civil society. It is perhaps one of the very few universities that act as an incubator for dissenting ideas. It is the co-existence of the above, which makes this university and its campus stand out in comparison to other public institutions in India. The university and its democratic character have been instrumental in providing the environment where dissent is also celebrated.

THE CASE OF JAWAHARLAL NEHRU UNIVERSITY, NEW DELHI

JNU, one of the premier public universities in the country, was established under the Central University Act, 1966. Since 2012, the university has been accredited with the award of Grade "A" [CGPA of 3.91/4.00], the highest in the country, by the National Accreditation and Assessment Council (NAAC), Government of India. The main focus of the assessment and accreditation is with regarding to teaching, research and extension activities of the university. The assessment also reviews innovations that contribute to the quality of the university.

In the last four and a half decades of its establishment, the university has successfully created a robust intellectual climate on the campus. The university has been attracting talented students, researchers, and faculty members from around the country cutting across, caste, class, religious, and gender lines. The faculty members play a key role in undertaking large-scale research studies in critical areas at the national and international levels. Their expertise is sought for strategic planning and policy formulations at the local and national level. For instance, members belonging to various faculties of the university represent their respective knowledge domains as experts or members of Planning Commission of India, or Central Advisory Board of Education (CABE) and so on.

Internationally, the faculty and students are well connected and hence bring into the classrooms the recent developments in theory and practice from across the globe. Beyond the national setting, the university and its actors, given an extensive list of formal MoUs with top-ranking universities and researchers abroad for teaching and research, has been a pioneer in promoting internationalisation in higher education.

The vision statement of the university reflects the previously mentioned perspective of the university's contribution to production and dissemination of knowledge and its linkages to national development and international outlook, enabling it to be one of the premier universities in the country. The vision statement (as stated in its Act, 1966 [53 of 1966] is reproduced here under) (Jawaharlal Nehru University Act 1966, p. 13):

The University shall endeavour to promote the study of the principles for which Jawaharlal Nehru worked during his life-time: national integration, social justice, secularism, democratic way of life, International understanding and scientific approach to the problems of society.

Unlike other public universities, JNU's educational philosophy is reflected in its academic structure which is democratic, broad-based and inclusive. The university over the years has developed innovative academic processes moving beyond traditional uni-discipline based departments to the creation of interdisciplinary centres where students from different disciplinary training work together to address real problems facing the country and the world. It is one of the few places in the country where interdisciplinary training is a habit and conversations between aestheticians and political scientists do not raise an eyebrow. The university has been the most preferred destination for students from different socio-economic, caste,

religious and disciplinary training backgrounds across the country. It is not unusual to observe students from natural and applied sciences participating in events organised by the departments of social sciences on national issues (The Hindu 2016b). The departments and centres/schools and special centres collaboratively engage in academic discourses through teaching, research and extension activities with students drawn from undergraduate, graduate and doctoral courses. JNU has undergraduate programmes only in foreign languages offered by the School of Language, Literature and Cultural Studies.

JNU is one of the few universities in India that has an active teaching and research programme. The autonomy³ enjoyed by the faculty to design and evaluate a course makes the teaching learning process vibrant and alive. A striking feature of JNU is that learning and academic debates move beyond the classrooms and infest the small coffee shops, canteens, street corners, corridors, dining halls and practically any informal space in the campus. Thus, learning moves beyond the classrooms in JNU. Being a residential university with hostels and residences of teachers interspersed (a unique feature of JNU), students' interdisciplinary engagement with academic subjects, knowledge, and research at large permeate the campus and move beyond classroom and stipulated office hours. Apart from such facilitative structural arrangements for dissemination of knowledge, series of lectures by eminent scholars and social activists/politicians are arranged regularly in the dining-hall of the hostels, late-into-nights to provide students an opportunity to engage intellectually on issues that are of concern to the country and the world.

Although there may be a very small number of universities in India that claim to have vibrant campuses, but what stands out is the issues and their critical deliberations appreciating each-others ideological positions are unique in JNU. Such an intellectual environment can be attributed to the students' and teachers' cosmopolitan nature, a legacy sustained since its inception. A cosmopolitan university is a precious resource, for it continuously feeds the public sphere with questions and answers, with challenges to accepted truths and alternative readings of canonical texts. In general, perennial challenge for universities is to keep pace with knowledge and social change by reconsidering their structural, functional and resource commitments to various areas of knowledge production (Gumport 2000). JNU, unperturbed by these challenges, has hitherto been at the forefront in production of knowledge and its linkages to the reforms in the social system and vice versa. This is under threat today, given the recent turbulence in

JNU. Censorship of ideas and social relationships is being demanded by outsiders, which can harm the very fabric of JNU.

However, the recent events of the alleged act of sedition in JNU in quick succession of the death of a student leader at HCU⁴ brings back to the centre the role of the state in protecting the autonomy of the university and creating democratic spaces for free public discussion and debates.

JNU: ACT OF SEDITION?

On February 9th 2016, JNU campus turned into an ideological battlefield—a common sight for an alumnus like me. However, what rocked the nation and JNU was the disciplinary intervention by the university administration and the state apparatus—the local police. The battle between the Democratic Students’ Union (DSU) representing the left-wing ideology and the members of the *Akhil Bhartiya Vidhyarthi Parishad* (ABVP), a student organisation representing the right-wing ideologies, representing national party—the Bhartiya Janata Party (BJP), presently forming majority in the national government, over a cultural evening on “A country without a post office” organised by the DSU to deliberate and protest against the execution of Afzal Guru (convict in 2001 Indian Parliament attack) and Maqbool Bhat (Kashmiri separatist leader), showcasing protest in the form of art, music, and poetry. Members of the ABVP protested against this event and sought the intervention of the vice chancellor of the university, asking him to prohibit the organisation of this event. Subsequently, the permission for the event was withdrawn in the 11th hour and this was reported in the media. However, the student organisers, condemning such draconian and authoritative intervention, continued to engage with the event by invoking their freedom of “speech and expression” (as enshrined in the Constitution of India). The event was held, led by the JNU Students’ Union members and its president and was attended by hundreds of students’ engaged in deliberations followed by torchlight procession across the campus, expressing solidarity and commitment to freedom of speech and expression.

Consequent to this, the members of the ABVP staged protests demanding disciplinary actions against the organisers for violating the orders of the university. The university administration ordered “disciplinary enquiry” and claimed “event organisers went ahead without permission.” However, the matter became more complicated, with ABVP members further alleging that the protest march consisted of students shouting “anti-India” slogans.

However, there were claims and counterclaims about whether the purported video showing students shouting anti-India slogans were part of the group that organised the event “A country without a post office.” However, the state and its apparatus along with university administration, under the pressure of ABVP, had to react to this and thus claimed the event and its proceedings as “anti-national.” Consequent to this, in addition to the university’s disciplinary action, the local police intervened and arrested the Jawaharlal Nehru University Students’ Union (JNUSU) president and few members of the organising committee of the cultural event for allegations of act of sedition.

Following a nationwide debate about the validity of allegations and the evidence, the students and faculty members of the university expressed solidarity and demanded the release of the student president. The expression of student voices and the democratic processes through the organisation of a series of lectures and symposiums was illustrative of the consequences of the democratisation of the JNU campus.

Students from other public universities in the country extended their support and solidarity to the incidents at the JNU and arrest of students on the alleged act of sedition. A nationwide expression of such solidarity marked some kind of a transformation in the university-nation interface in reposing the need to strengthen democracy and its practices.

The events that unfolded following these charges are an invitation to new debates, reconstructing concepts critical to the future of our university, and its interface with democracy and re-current crisis of universities as “contested spaces” (Bhushan 2016). These debates drew attention to fundamental questions of the meaning and role of public university in a democracy and nation-building process. What is the role of students in the universities? What kind of autonomy exists for the students/teachers towards production, dissemination, and practice of knowledge? The diverse responses that constitute the debates and discussions lay the corner stones for reconstruction and creation of knowledge informed by the changing local realities and experiences.

PEDAGOGY, STUDENT VOICE AND DEMOCRACY: ANALYSING THE PRACTICE

Given the previous context, JNU since its inception has been a symbol of empowerment, intellectual freedom and student-activism. Classrooms are democratic spaces, with limited scope for any hierarchies between the

taught and the teacher. The relationship between the teacher and the student is collegial, unlike many public universities where the relationship is marked by authority. Classrooms are discussion based, leading to critical engagements between the students and teachers.

Alluding to Shrewsbury (1987) and Morrison (2008), mentioned above, classrooms are “critical domains” where the teacher and student critically engage with ideas, concepts, and its linkages to reality. Such process of deconstruction and re-construction of knowledge is practiced and witnessed in the milieu of JNU. Classrooms are guided by dialogue and debates between the learners and teachers. There is sufficient scope for opinions that need not align with existing frameworks. The pedagogy allows students the opportunity to express opinion which need not align with the dominant scholar’s viewpoint—mainstream thinking. It is through this process students develop skills of reasoning and logic to put forth a argument. Opportunities of this kind are given in plenty in classrooms.

It is largely believed that the curriculum and pedagogy are more conservative and centralised at the school rather than universities. While this may be mostly true in the Western context, majority of the Indian universities are an extension of schools. The centralised mechanism in the construction of the curriculum and teacher training are the underlying premise on which the current school practices in India rest on leaving little scope for democratic processes in classrooms. It is imperative that schools need to engage in generating new categories that aids critical interrogation and provides alternatives and modes of practice in this changed pedagogy. Schools in India are not viewed as site of contestations or conflict. Rather they are spaces that legitimise dominant forms of cultural capital and ways of life.

It is only in universities like JNU and HCU with a diverse student and faculty composition coupled with teacher autonomy that provide spaces for critical pedagogy and opportunities for critical thinking at the university level. Such pedagogical practices based on dialogue, unpacks linkages between experience of the learner (Kolb 1982) and the taught to what is being “taught.” In other words, JNU becomes a platform for enabling critical thinking—a platform for alternative student’s voices thereby furthering the ideal goals of university education.

The milieu of JNU, the classroom, and beyond classroom experiences intertwine in interesting ways that the process of learning and reflection operates as a continuum between and across students and faculty.

The students, from different socio-economic backgrounds, regions and language reflect diversity and vibrancy on the campus.

Unlike most universities in India, the students' union is extremely active in JNU and provides close to real experiences of democracy within the campus. The elections in JNU mirror the elections at the national level. It is not often that the campus witness consensus on these issues, instead promote critical deliberations and debates thereby providing a democratic space by respecting viewpoints across ideologies.

Aptly, the university campus is not less than an active political "constituency" in the country. The campus is abuzz with these movements expressed through sloganeering, distribution of pamphlets, protest marches/torchlight protests, campaigning and other engagements beyond classrooms. Thus, the idea and practice of democracy thrives on campus, which is reflected especially during the formation and operation of the University's Student Union elections and post-elections, respectively. The Student Union elections, held annually, provide a critical space for deliberations of individual ideological positions and the knowledge gained from classroom learning. Hence, the student union elections in JNU are an illustration of the construction and reconstruction of knowledge within and beyond classrooms.

Thus, there are several ways that manifestations of democratic practices are experienced in daily life on the campus. With such inclusive and liberal environment, the university has been a significant contributor to the nation and its development. As mentioned previously, the controversy over students organising a programme on the theme of "A country without a post office—against the judicial killing of Afzal Guru and Maqbool Bhatt" (The Hindu 2016a), without seeking the permission of the university administration resulting in arrest of the student union's president under the Act of Sedition,⁵ and led to a tussle between the university administration and students' union over restrains on organising a public event to express their discontent over issues related to capital punishment in India and expressing their dissent on violation of human rights. Such a response from the university administration affecting the democratic legacy of the university resulted in university-wide and nationwide support from academia (researchers, students, faculty members), against authoritative directions of the university administration and the law enforcing agencies of the state.

The argument in this narrowly constructed meaning of sedition brought to the fore the central issue of scholarship. In this construction, scholarship becomes necessarily antinational when every act of dissent is read as sedition

or anti-national. Professor Romila Thapar, who has groomed generations of scholars at JNU based on the ideals of secular democracy and plural university, in her most recent book—*On Nationalism* (Thapar 2016)—argues that nation-building for her is not separate from university-building. She explains that one needs autonomy of expression when discussing not just the kind of nation one wants but the university we dream of. In the wake of the fact that the ethos of democracy is not only taught but also practiced within the classrooms and beyond, the issue of JNU raises critical questions of autonomy and the emerging idea of a university in contemporary India. However, the deliberations regarding the students of the university being “anti-nationals” for expressing their views contradicts the very ethos of a public university.

CONCLUSION

The learning spaces in schools in India are conservative by all standards. The schools unfortunately have been constructed as spaces through which there is a transmission of the so-called privileged knowledge with little scope for contestations. In other words, schools have a clearly defined role of providing different classes, social groups with forms of knowledge and skills, values and culture that not only legitimate the existing social order but also track students into a labour force differentiated by gender caste and class (Giroux 1986). In this situation, there is very little scope of students to mediate their identity and express their sense of place, time, history, culture and experiences through this highly regulated space of learning provided in schools. Thus, schools in India are not visible sites of contestations and conflict by the very nature of its constitution in terms of the student and teacher body; pedagogic practices or the curriculum. The centralised mechanism in the construction of the curriculum and teacher training are the underlying premise on which the current school practices in India rest, leaving little scope for democratic processes in classrooms.

In contrast, the higher education space in India is relatively more dynamic and provides an environment for the growth of democratic processes. However, there is a need to recognise that the higher education institutions are not homogeneous across the country. Most of the universities and elite institutions are a reflection of the hierarchy of Indian society and an extension of school education in India with little scope for student agency and democratisation.

Public universities like JNU provide a breath of fresh air where the interplay of student and faculty diversity coupled with teacher autonomy

and critical pedagogy gives rise to an academic culture that celebrates students' voices and democracy. Incidents like the act of sedition and the aftermath cautions the very loss of these critical spaces that contribute to the larger democratic processes of the nation.

The recognition of the changing student and faculty compositions on university campuses and their role in defining the learning spaces in a truly participatory process in making the university a vibrant centre of learning provides a ray of hope for the future. The nexus of the complex interplay of the curriculum and conservative pedagogical practices that define the learning spaces in traditional universities needs to be broken to create democratic spaces and provide agency and voice to the students. The new pedagogies will have to take into cognisance how subjectivities are produced; how teachers and students sustain, resist, or accommodated languages, ideologies, social processes and myths that position them within existing relations of power and dependency. The pedagogy points to the need to recognise the shifts in the balance of power and resources between groups that will in turn impact the process of knowledge production and practices in institutions of higher learning.

NOTES

1. Scheduled Castes (SCs) and Scheduled Tribes (STs) are among the most disadvantaged socio-economic groups in India.
2. Reservations for the Scheduled Castes, Scheduled Tribes, and minorities.
3. Majority of the universities in India follow conservative teaching and learning pedagogies with little teacher autonomy, where information transfer is the focus. In such an environment, democratic processes and students' voices have very little place.
4. University of Hyderabad is a central university located in South India emerging as another higher educational institution along the lines of JNU which has been able to attract talented students from across the country.
5. According to the Indian Penal Code (IPC) Sections 124A—the act of sedition—entails: “Whoever, by words, either spoken or written, or by signs, or by visible representation, or otherwise, brings or attempts to bring into hatred or contempt, or excites or attempts to excite disaffection towards, the Government established by law in India, shall be punished with imprisonment for life, to which fine may be added, or with imprisonment which may extend to three years, to which fine may be added, or with fine” (India Today 2016).

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