

GUIDELINES FOR SCHOOL SOCIAL AUDITS

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POLICY BRIEF

Kiran Bhatta
Centre for Policy Research

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ABOUT NCPCR

The National Commission for Protection of Child Rights (NCPCR) emphasizes the principle of universality and inviolability of child rights and recognizes the tone of urgency in all the child related policies of the country. For the Commission, protection of all children in the 0 to 18 years age group is of equal importance. Thus, policies define priority actions for the most vulnerable children. This includes focus on regions that are backward or on communities or children under certain circumstances, and so on. The NCPCR believes that it is only in building a larger atmosphere in favour of protection of children's rights, that children who are targeted become visible and gain confidence to access their entitlements.

ABOUT THE SOCIAL AUDIT GUIDELINES

The Ministry of Human Resource Development [MHRD], Government of India, asked the National Commission for the Protection of Child Rights [NCPCR] to develop a set of Guidelines for School Social Audits, under the Right to Education Act [RTE], as the NCPCR has been given the legal mandate to monitor the enforcement of the RTE across the country. To undertake this task, the Commission set up a Working Group under the chairpersonship of Kiran Bhatti. The Working Group included persons from several civil society groups who had been involved in a pilot on social audits, conducted under the aegis of NCPCR in the previous year. They held one meeting at the NCPCR to discuss the framework for the Guidelines and the essential elements of the social audit design to be included in the Guidelines. Thereafter the guidelines were drafted by Kiran Bhatti, and on concurrence with the Working Group members, submitted to NCPCR in October 2013. They were subsequently sent on to the MHRD for appropriate action. As the NCPCR soon after lost all its members and its chairperson and the MHRD also saw new officials come in the place of the ones that had requested the Guidelines, it is unknown what, if any, action has been initiated on them. They are nevertheless presented here for possible use by government or non-government agencies and in the hope that the institutional memory of MHRD and NCPCR may someday be revisited and the Guidelines brought forward for appropriate action.

INTRODUCTION

The Right to Free and Compulsory Education Act, 2009 (RTE Act) placed the responsibility of monitoring the implementation of the Act on the National Commission of Protection of Child Rights (NCPCR). In pursuing its mandate of monitoring, the Commission has taken the view that the most effective monitoring can be done through the involvement of people particularly the rights-holders. Over the last two decades, civil society organizations, academics, and researchers have debated different methods for measuring and improving transparency, accountability and monitoring in development programs meant for the poor. In this area, Social Audits have emerged as a powerful method of including people's participation in evaluating the implementation of programmes meant for them. This has allowed not only verification of the official account of the programme but also assessing its usefulness to the people for whom they are meant. Social Audits involve looking into those areas of information, which conventional audit mechanisms and agencies typically do not include. It also involves looking into those areas that official data sources may not collect. These could be either information accessed and brought into the public domain or new information collected from the people.

The word Audit itself comes from the Latin word *Audiere* i.e. to hear or to check. A Social Audit is therefore a mechanism for sharing of information with the public that allows them to "hear" and check for authenticity and veracity. This direct "audit" not only increases the level of awareness amongst the people but also makes it possible for them to demand greater accountability. In the framework of rights of which RTE is now an important element this is of crucial importance. For the monitoring agency it is essential to know if the rights are reaching the people or not and there is no better way of doing so than checking from the people themselves.

Given below are Guidelines for how Social Audits of schools may be conducted. These include 1. General Principles that need to be kept in mind when designing the School Social Audit; 2. The main objectives of the audit; 3. The different steps involved in a School Social Audit; 4. The agencies that would be involved at different stages of the audit and 5. The resources required for the process.

The Guidelines will need to be supplemented with an appropriate set of Tools to conduct the actual audit. For the Guidelines and the Tools to be effective accountability structures will also need to be fixed at different levels by State governments.

I. GENERAL PRINCIPLES

The Five General Principles that should be followed in all aspects of the Social Audit and by all the agencies involved including the Social Audit Facilitating Team (SAFT):

1. *Keeping the Rights of the Child at the Centre:*

- Since these guidelines are meant for monitoring the implementation of the Right to Education Act, the rights framework must form the overarching framework for the School Social Audit.
- At all points the child and her rights should be the focus of the Social Audit exercise.

2. *Transparency:*

- There should be transparency in functioning of the Social Audit Facilitators.
- A clear and full introduction of the Social Audit Facilitators must be provided to the community.
- All findings of the audit should be presented in their true form and with supporting evidence.
- All the findings of the Social Audit process should be made available in the public domain.

3. *Accountability:*

- Accountabilities should be fixed within the education department against each entitlement of the Act – who is responsible for its delivery and who is the supervisory officer responsible for ensuring that if a particular entitlement is not delivered, action is taken.
- Time lines should be fixed against each entitlement whose violation must be redressed within that time frame by the relevant authorities.
- Overall responsibility for taking action and ensuring redress on the Social Audit findings rests with the education department as it is the implementing agency for RTE.

4. *Participation:*

- The Social Audit should be based on participation by the community as they have a direct stake in the RTE.
- In particular participation of persons from excluded and/or marginalized communities must be ensured.
- Everyone must be treated as equal and participation encouraged from across all class backgrounds. No discrimination based on caste, religion, occupation and gender must be condoned.

- All stakeholders should be given an opportunity to make a representation to the Social Audit facilitators.

5. **Objectivity:**

- The Social Auditors must maintain objectivity and neutrality throughout the auditing process. No sides must be taken during the auditing process and nor should it be dictated by anyone's personal agenda or viewpoints.
- No special favour must be given or solicited from the teachers or any official or public representative who is connected with the implementation of the RTE Act.
- No politicization of the monitoring process must be allowed.
- Decisions to resolve irregularities in implementation reflected during the auditing process should be taken only after both sides are given a fair chance to present their sides.

6. **Dialogue:**

- Solutions to the problems identified in the Social Audit should as far as possible be resolved through a process of dialogue between the community and the administration.
- Platforms for dialogue should be established at different levels, especially close to the people to facilitate their participation.
- Dialogue process should be recorded and its proceedings formalized/ institutionalized.
- Action should be initiated on the basis of the dialogue process.

II. OBJECTIVES OF THE SOCIAL AUDIT PROCESS

1. **To ensure** that the rights of the child as guaranteed under the RTE Act are being provided.
2. **To review** the implementation of the RTE Act with the involvement of the community.
3. **To verify** all information related to the RTE at the school and community level by the primary stakeholders, i.e parents and children.
4. **To cover** all aspects of the school and schooling related to the provisions of the RTE Act. To take photographs wherever possible.
5. **To include** in addition to the infrastructure facilities, mid-day meals, incentive schemes and pupil-teacher ratios, the quality of teaching-learning as well. Special innovative methods involving parents may be developed for this.

6. **To use** proxy indicators, such as existence and adherence to a fixed time table of classes, regularity of teacher attendance, quality of class and homework as seen in the student's note books, individual pupil records, required to be maintained by the teacher showing the child's progress, use of TLMs etc., to assess quality of schooling.

7. **To use** ways and means of assessing the existence of practices such as corporal punishment and discrimination. Special Focus Group Discussions employing child friendly means may be used for this purpose.

8. **To ensure** that conflict areas and those prone to natural disasters are included and special tools developed for conducting audits there.

9. **To ensure** that vulnerable children, both in school and out of school are identified and the reasons for their vulnerability noted, for developing appropriate strategies for action.

10. **To develop** a dialogue between the community and the education administration especially at the lower levels – school, panchayat, block and district.

11. **To activate** a grievance redress system involving the local authority and the SCPCRs.

12. **To fix** accountabilities at appropriate levels of the implementing and grievance redress agencies to ensure that the entitlements as guaranteed under the RTE Act are delivered to each child in a timely fashion.

III. STEPS OF THE SOCIAL AUDIT PROCESS

A comprehensive process of auditing schools involves a 3 part process including the following phases:

1. **The Preparatory or pre-audit Phase:**

This process must be held in the first quarter of the school cycle and include the following steps:

- Environment Building and Awareness Generation:

The Local Authority as defined in the State Rules for RTE in each State, must take the responsibility for this phase. The purpose of this phase is to build awareness and an environment for community participation in the School Social Audit process. The Local Authority should convene meetings of the Education Sub-group of the Panchayats to elicit their participation in the process. They should also hold meetings with the SMC members and the community at large to share information about the RTE and discuss their role in a School Social Audit. Wall-writings of

RTE entitlements and the role of the community in monitoring, information pertaining to schools under Section 4 of the RTI Act, pamphlets and local forms of communication may be used during this phase. This entire phase must be geared towards getting the communities to understand the process of a School Social Audit and to build an interest in their participation in it.

This phase could be spread over a month after which a Special Gram Sabha must be held to select the SAFT.

- Selection of the SAFT:

The SAFT that will conduct the School Social Audit should be selected in the Special Gram Sabha in a transparent manner.

The composition of the SAFT should be based on the following:

- a) 2 Representatives of SMCs [at least 1 of whom should be a woman]
- b) 1 parent belonging to the EWS or socially backward category.
- c) 1 Representative of the Local Authority
- d) 1 Representative of a Civil Society Group working on education and /or Social Audits.
- e) 1 Representative of a Self-Help Group or Mahila Mandal or Youth Group.
- f) 1 Government Official [not belonging to the Education or related department – could be from health].

The following exceptions should be kept in mind while selecting the SAFT:

- a) No person belonging to any political party should be a member of the SAFT.
- b) No person involved in running a private or NGO-run school should be included in the SAFT.
- c) No government official associated with the education or related department.
- d) Members from the SMCs must not be repeated in successive SAFTs. They should be rotated to ensure that the same SMC is not represented again till all others in the Panchayat have had a chance.

Tenure of the SAFT: Should be 2 years coinciding with the tenure of the SMC. In each Term the SAFT must complete 2 audits.

The periodicity of the School Social Audit : It should be done annually and held in the 2nd quarter of the school cycle, following the environment building phase held in the first quarter.

- Training of the SAFT:

It must be ensured that the persons conducting the Social Audit have a clear understanding of the RTE Act, 2009. For this a thorough training must be conducted for the SAFTs .

The trainings should be done by a Resource and Coordination Group [RCG] set up at the District level. The RCG should conduct the training of the Social Audit facilitation teams immediately after their formation in the 1st quarter of the school cycle. The trainings of 5-10 SAFTs can be conducted together.

2. The School Social Audit Phase

- The School Social Audit should be conducted in a manner that it does not disrupt the regular functioning of the school.
- The SAFT must make an effort to meet not just the teachers and the head teachers but also the SMC members and the mid-day meal cooks and helpers.
- The Social Audit facilitators must also speak to a sample of children from each class using child-friendly methods to get information from them.
- A sample of parents, other than the SMC members should also be part of the SAFT's mandatory list of respondents.
- The SAFT's visit should be publicized widely to enable parents or other community members to give their inputs to the Team if they so desire.
- The SAFT should be open to inputs from all stakeholders during the Social Audit period.
- A set of tools should be developed for auditing different aspects of the RTE Act. And the SAFT should be trained thoroughly in the use of these tools.
- The tools must provide space for inputs from community stakeholders.

3. The Follow-Up or Post-Audit Phase

- The findings of the School Social Audit should be shared in another Gram Sabha held for this purpose in the beginning of the 3rd quarter of the school cycle. Further verification of the findings by the community may be done at this stage.

- The officials responsible for redressing and/or finding solutions for each of the issues raised in the School Social Audit should be publicly announced in the Gram Sabhas.
- Timelines fixed for finding solutions and redressing grievances raised during the School Social Audit should also be publicly announced and upheld.
- The Social Audit findings should then be discussed at Shiksha Samvads held at the Block level with the purpose of finding solutions at the Block level as far as possible or sending them to the appropriate level, wherever not possible. The minutes of the Shiksha Samvads must be put in the public domain.
- The Reports of the School Social Audits must be made a part of the regularly held monthly meetings at the Block and District level of the Education department to enable timely follow-up.
- Reports for the District and State level should also be prepared and sent to the appropriate Departments as well as to the State and National Commissions for Protection of Child Rights.
- Failure to adhere to time lines or redress grievances can result in an appeal being filed with the Local Authority and/ or the SCPCR.
- Timelines should be set for the appeal process as well.

IV. AGENCIES INVOLVED IN CONDUCTING SOCIAL AUDITS

1. Government

The following are the roles that the government agencies must play in facilitating the Social Audit process:

- Providing Information
- Enabling Access to schools and records
- Issuing government orders for the conduct of audits
- Convening follow-up meetings, including Shiksha Samvads
- Creating an MIS for Social Audit findings and in the interim putting them up on the department's web-site.
- Taking action on Social Audit findings
- Appointing Resource and Coordination Groups at District level
- Providing adequate funds for Social Audits

- Fixing accountabilities at appropriate levels of government
- Activating grievance redress mechanism for RTE Act.
- Fixing timelines for redress against each violation of the RTE entitlement.

2. Community

The roles that the community plays in enabling the Social Audit of schools is described below:

- Participating in the Gram Sabhas
- Volunteering for SAFT
- Participation in Community Meetings
- Participation in Shiksha Samvads

3. Social Audit Facilitation Team [SAFT]

The following are the responsibilities of the SAFT:

- Conduct the Social Audit as per guidelines
- Share information collected with the community
- Make information available to the RCG for block, district and state reports
- Put Social Audit findings in the public domain.

4. Resource and Coordination Group [RCG]

A Resource and Coordination Group should be set up at the District level to provide support in the preparatory and follow up phases of the Social Audit. The RCG should be located in the office of the District Education Officer, but accountable to the District Collector. This is to ensure independence from the Education Department and also to allow for cross-department convergence and follow up.

The Group should comprise of persons drawn from civil society who have had experience in conducting Social Audits and are familiar with the education system. The Group would work on a full-time basis at levels of remuneration fixed by the State government. The members of the RCG should be hired for a minimum of 4 years to ensure continuity across trainings and audits of at least 2 SAFTs.

• Overall Roles and Responsibilities of the RCG:

- a) Preparation of Publicity and Awareness Generation Material

- b) Preparation of Training Manual for training the SAFTs.
- c) Training the SAFTs.
- d) Facilitate the preparation of School Social Audit Reports.
- e) Facilitate Shiksha Samvads
- f) Prepare District and State Social Audit Reports. The State level Reports must be sent to NCPCR and MHRD.
- g) Assist in follow-up and appeal process.

- School Quarter-wise Activities for the RCG

a) *First Quarter:* This is the awareness generation and publicity phase in which the RCG would help not just in preparation of materials for publicity but must also develop modes of publicity and awareness generation. In this they will work closely with Panchayat level local bodies, community groups and civil society organizations. It will be their responsibility to identify such associations and to engage with them in the awareness drive. However, the process as mentioned above will be led by the Local Authorities. The RCG will assist them. At the end of the quarter the RCGs will also conduct trainings of the SAFTs.

b) *Second Quarter:* Some trainings may spill over into the second quarter. Following those the RCG will provide technical assistance and trouble shooting help to the SAFT during this phase.

c) *Third Quarter:* Dissemination of information collected during the School Social Audit and Shiksha Samvads will be held during this period. The RCG will prepare reports based on the Social Audit findings and help in organizing and facilitating the Shiksha Samvads.

d) *Fourth Quarter:* This is the quarter meant for follow-up. In this period the RCG's will track and follow-up on the issues raised during the audit. It will include sending reports to the NCPCR and activating the appeal process at the Local Authority and /or SCPCR level.

V. BUDGET

Following other legislations, such as the MGNREGA and the RTI, 1% of the total RTE budget should be set aside for transparency, accountability and monitoring purposes. Of this a certain percentage can be designated for Social Audits. In the absence of this provision currently Government of India and State Governments must endeavour to make some provision for these activities from the budget allocations.



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DHARMA MARG, CHANAKYAPURI, NEWDELHI-110021
WWW.CPRINDIA.ORG