**IN THE HON’BLE HIGH COURT OF KARNATAKA**

**AT BANGALORE**

**WP No. 15768/2013 (EDN-Res)**

Between:

The Registrar Judicial ...Petitioner

And

The Chief Secretary,

Govt. Of Karnataka ...Respondent

**PRELIMINARY REPORT SUBMITTED BY PARTY-IN-PERSON,**

**SMT. KATHYAYINI CHAMARAJ**

The undersigned begs to submit as follows:

1. The abovesaid Writ Petition is filed with the prayer to direct the respondents to implement the provisions of the Right of Children to Free and Compulsory Education Act, 2009 (RTE Act). One of the objectives of the RTE Act is to ensure compulsory admission, attendance and completion of elementary education by every child of the age of six to fourteen years. In this regard, the undersigned wishes to place on record her observations and suggestions towards ensuring that the school drop-rate rate is reduced and children receive education as is their constitutional right.

**Statistics on number of out-of-school children**:

1. It is submitted that as per the analysis carried out by the undersigned there are 6,28,047 children who have dropped out, or are missing, after enrolment in the last seven years. A copy of said Analysis is marked as **Annexure-A**. This is the Analysis of the enrolment into the 1st Standard in the last seven years and the current enrolment from 2nd to 8th Standards. A total of 78,76,110 children got enrolled into 1st Standard in the last seven years from 2005-06 to 2011-12. In the year 2012-13 these children would now be in the 2nd Standard to 8th Standard. As per the government’s own enrolment figures of children in the 2nd to 8th Standards in the year 2012-13, there are currently only 72,48,063 children. Hence there are 6,28,047 children who have dropped out, or are missing, after enrolment in the last seven years.
2. The Education department in its response to the Hon’ble High Court claims that only 51,994 children are out of school during 2012-13 and that 34,034 out of these have been given special training in order to mainstream them. Even then, this still leaves 17,960 children out of school. These figures are arrived at after doing door-to-door surveys every January by the Education Department for the purpose of creating the list of eligible children for compulsory primary education (CPE survey). However, these figures are at odds with the enrolment statistics analysed by the Undersigned and placed as Annexure – A.
3. Thus, the figure stated by the Education Department does not match at all with the actual number of children who have dropped out of school as analysed by the Undersigned.
4. These figures of the Education Department do not tally also with the recent figures given out by the Labour Minister that there are 1,85,595 child labourers in the State as per a recent survey by UNICEF. A copy of the statement of the Labour Minister reported in the Deccan Herald dated 13/6/2013 is placed as **Annexure - B**.
5. It is humbly submitted that the Education Department needs to provide an explanation about these 6,28,047 children missing from their rolls and the steps taken/being taken to ensure that these children return to school.
6. It is further stated that 34,034 out of these have been given special training in order to mainstream them, however there is no assurance being given that these children have been mainstreamed. This too needs to be replied to by the Education Department.
7. A study by the Azim Premji Foundation says that out of 4,443 children in the age-group 6-14 surveyed, 773 children or 17.39% were out of school and 175 of them, or 25%, had never been enrolled. A copy of the news report in ‘The Hindu’ dated 17/05/2013 citing the abovesaid study is placed as **Annexure –C.** That more than 6 lakh or even 51,000 children are out of school points to the fact that the education department has no protocol or procedure for ensuring that all children 6-14 years are in school and that no one is being held accountable for the failure to ensure the fundamental right to education of each and every child in the State.
8. The undersigned humbly submits that she was asked on 06/04/2010 by the then Principal Secretary for Primary Education to *“prepare action plans in respect of Out of School Children, RTE Act”*. Based on this assurance, the undersigned submitted **“A Suggested Protocol for ensuring retention of vulnerable children”** on 20/07/ 2010 to the then SSA State Project Director with copy to the Principal Secretary, but no action on this followed. Copy of the email dated 06/04/2010 from the Principal Secretary to the undersigned is placed as **Annexure – D**. Copy of the email along with the report submitted to the undersigned is placed as **Annexure – E**.
9. Subsequently, the “Suggested Protocol” was sent to successive officials, the Principal Secretary, SSA Director and Commissioner for Public Instruction, but no action has followed***.*** Copies of the said communications are placed as **Annexures – F1**, **F2** and **F3** respectively. The undersigned humbly requests the Hon’ble Court to issue suitable direction to the concerned authorities in this regard.

**Method of calculating Average Annual Drop-Out Rate**

1. As pointed out by the undersigned there are 6,28,047 children who have dropped out from school over the past seven years. This works out to about 8% children who are out of school at any given time. However, the official drop-out rates are far lower due to the unscientific manner in which it is calculated by the Education Department.
2. The Annual Report of the Education Department for the year 2011-12 calculates the Average Annual Drop-Out rate or the transition loss in all classes over a period of 1 year only, for example from 2010-11 to 2011-12. This gives the false and deceptive drop-out rate of a mere 1.19% in the lower primary cycle and 4.35% over the higher primary cycle and the combined annual drop-out rate for the elementary cycle of 5.54%. Relevant extracts of the Annual Report of the Education Department are placed as **Annexure – G**.
3. This method of calculating Average Annual Drop-Out Rate does not give the overall transition loss over a period of eight years from 1st Std to 8th Std, which would give the true drop-out rate.
4. For instance, the enrolment figures of the department show that out of 11,56,527 who were admitted to Class 1 in the year 2005-06, there are only 9,68,227 currently in Class 8 in 2012-13, indicating that 1,88,300 have dropped out. This works out to a transition loss of about 16.28% over a period of eight years and not just 5.54%, the officially given drop-out rate. 16.28% would be the % of children failing to complete eight years of compulsory education.
5. Thus, it is submitted that if, as per the department, 5.54% are dropping out annually, then it can be assumed that (5.54 x 8) 44.32% children would have dropped out over a period of eight years and would fail to complete 8 years of education.

**Definition of drop-out:**

1. What needs to be questioned is the very definition of a drop-out as: *“Any child remaining absent in excess of 60 days in any academic year (excluding medical grounds) and not presenting himself to school thereafter”.* It is questionable as to why such long period of 60 days has been provided and the rest of the academic year thereafter when the child stays away. This seems to suggest that departmental officials need not do anything to bring the child back during this period and they need to take action only at the end of the academic year when the child is officially declared a ‘drop-out’. It is not a fundamental right to education if a child can remain absent for 60 or more days out of about 210 school working days with no action being taken ‘as per law’ to bring him/her back. These procedures need to be made part of the law.
2. No action being taken over this long period is the reason for these children getting into situations of child labour, getting trafficked or getting sucked into illegal activities, losing their childhood, getting physically, mentally and emotionally abused and their psyches destroyed with every likelihood of the child becoming asocial or anti-social.
3. There is a need to re-define drop-out as: *“Any child which has unexcused absence of three days”, as prevalent in other countries which have succeeded in ensuring compulsory education. One such sample protocol for dealing with children having unexcused absence of three days from a school*”. This is adopted from the Youngsville Middle/Senior High School, Parents’ Handbook and is placed as **Annexure - H**.

**Futility of ‘curative’ approach of conducting bridging programmes:**

1. All the efforts cited by the Government in its response to the Hon’ble Court are for a ‘curative’ approach to the problem after the children have become confirmed drop-outs. There is no record of a preventive approach. Further, a report in Deccan Herald of 13/06/2013 (placed as Annexure-B)*,*cites the Labour Minister of Karnataka stating that on implementation of the State Child Labour Action Plan between 2001-02 and 2012-13 (12-year period) only 1.08 lakh child labourers were freed and provided education under rehabilitation programmes. This figure indicates the impossibility of rehabilitating all child drop-outs, who are in the range of 6 lakhs currently, through a ‘curative’, rehabilitative approach. Children would have crossed the age of 14 even while waiting to be rehabilitated and they would no longer be considered drop-outs.
2. In another instance, CIVIC Bangalore conducted a survey in Deshyanagar slum (Sagayapuram ward of Bangalore) in the year 2008 and found more than 90 children who had remained out of school for several years. Upon CIVIC’s application, and follow-up with an RTI application asking for the action taken report on the application, a Residential Bridge Course was sanctioned for them. However, as per the report in Deccan Herald dated 30/03/2011 placed as **Annexure – J**, none of the 90 children attended the bridge course due to the resistance of the parents who preferred to send their children to beg. Thus, due to lack of relevant protocols, nothing was done about the Deshyanagar slum children and they have no doubt now crossed the age limit of 14 years without having undergone compulsory education.
3. Further, running bridge schools at unit costs per child ranging from Rs. 5,000/- to Rs. 20,000/- is a double expenditure as the government would have already invested in opening formal schools in every neighbourhood with trained teachers. While these facilities and qualified manpower languish due to depleting numbers of children who drop-out, parallel institutions, often run by NGOs, are opened to conduct bridging courses. Often, these become permanent parallel structures as the flood of drop-outs is never-ending. The bridging programme is literally like bailing out water with a ladle while the boat is filling up through leaks. Unless the ‘leak’ is first plugged, or drop-outs stemmed, any amount of bridging programmes will be futile**.**
4. The bridging protocol should be for the limited purpose of mainstreaming as many of the currently out of school children as possible and not as the only way of dealing with the problem, as a perpetual exercise, without a preventive protocol being in place at the same time. The question arises why the same amount now being spent on bridging programmes cannot be used to prevent drop-outs. Since more than 97% children aged 6 years do enrol in Class 1, ensuring their retention through suitable preventive actions would ensure that Universal Elementary Education is achieved.

**Need for a preventive protocol:**

1. Without a preventive approach, we will continue to conduct bridging programmes forever.  The department is aiming to bring down the drop-out rate by a few percentage points each year through ‘persuasion of parents’. That is a way of bringing in *“gradualistic and incremental improvements”* which is inconsistent with the concept of a fundamental right, which requires action to be taken for each and every child immediately. The aim of the preventive protocol should be to make future bridging programmes unnecessary because no child will have been allowed to become a drop-out for such stretches of time that they will need bridging.  This approach is sadly lacking in the RTE Act and circular that has been issued on 05/06/2010 of Karnataka, which is premised on the assumption that there will be children who have not been attending school for more than five months!
2. In the study by the Azim Premji Foundation reported in ‘The Hindu’ of 17/05/2013 (placed as Annexure - C) a majority of parents and children have cited economic compulsions as the reason for children dropping out. Regarding these factors, the Karnataka Right of Children to Free and Compulsory Education Rules, 2012 at Rule 4(9) merely states that; *“The CPI or Local Authority shall ensure that access of children to the school is not hindered on account of social and cultural factors”*. But there is nothing further in the Rules to say how the CPI or Local Authority has to achieve this.

**Need to assist parents of vulnerable children:**

1. Jaap E. Doek, the then Rapporteur of the UN Committee on the Rights of the Child and later its Chairman, stated in an interview to this writer in 2001 that when parents are poor, *“the solution**(in addition to compulsion on parents) is to make a sub-provision for mitigating factors”*. The mitigating factors can be listed and *“the state should develop the criteria for eligibility upon which poor parents are to be assisted in fulfilling their duties to their child.”* This is also a requirement under Article 18(2) of the UNCRC”, Mr. Doek said. A copy of the Interview in Sunday Herald dated 11/03/2001 is placed as **Annexure – K*.*** It is also relevant to refer to the article by the undersigned appearing in Humanscape dated December 2002 is placed as **Annexure – L**.
2. It is submitted that this view receives support from Article 18(2) of the United Nations Convention on Rights of the Child (UNCRC), which requires the state, in case parents are unable to provide the rights of children for any reason, to “render appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities” and to ensure the development of institutions, facilities and services for the care of children”. Further Article 19 of the UNCRC requires States parties to prevent neglect, exploitation and abuse of children, including by parents, and requires the state to take appropriate measures to provide support to the child and its parents or care-givers in such cases.
3. It is relevant to point out that the Constitution of India also reiterates this. Article 41 of the Constitution enjoins upon the state to provide assistance to the weak, in cases of “undeserved want”, as far as their education is concerned. Article 46 calls upon the State to “promote with special care the educational and economic interests of the weaker sections of the people, and in particular, of the scheduled castes and the scheduled tribes and shall protect them from social injustice and all forms of exploitation”.
4. In the abovesaid Interview with Mr. Doek he has also stated that; “Where the parents are poor, the state should consider a subsidy to parents – for a limited period of time only – and work on income-generation activities for them, on condition that their child comes to school. Parents should apply for the subsidy and the criteria for eligibility to the subsidy should be developed.
5. This is exactly what successful initiatives in ensuring compulsory education have done, like the Brazilian government’s *‘Bolsa Familia’* programme of conditional cash transfers to parents to ensure compulsory attendance of their children in school. Similarly, the Bhagyalakshmi Scheme of our own government which gives a bond of Rs.10,000/- to the first two girl children at birth, which matures to one lakh rupees on their attaining 18 years - if they fulfil the condition of full immunisation, attendance at anganwadi, completion of 8 years of compulsory education and postponement of marriage beyond 18 years - is a scheme that needs to be widened to cover all vulnerable children whose parents are finding it difficult to educate their children due to economic reasons.
6. While the above preventive approach of not letting future cohorts drop out is entirely do-able, attempts focusing entirely on a curative approach of rehabilitating existing child labourers of all ages (6-14) can only reach limited numbers of children due to the large numbers of children involved (in lakhs) and the period of 3-18 months required to rehabilitate them.  The problem will also become insurmountable if the preventive approach outlined above is also not in place, as fresh drop-outs will continue to appear even as older drop-outs are rehabilitated.  Hence the greater focus needs to be on preventing future drop-outs and not just exclusively on rehabilitating existing child labourers.

**Need for exclusive Attendance Authority**

1. For the implementation of both the protocols, exclusive Attendance Authorities (AA) for every Gram Panchayat/urban ward under an exclusive official appointed for solely this purpose, other than HMs and teachers, perhaps an ‘excess teacher’ or a Secretary in each school, need to be appointed who will be responsible for the implementation of Sections 3 and 4 of the RTE Act on Free & Compulsory Elementary Education and elimination of child labour in the area. He/she needs to liaise with the Gram Panchayat or Municipal Standing Committee on Education or Child Rights Task Forces or SDMCs in the area.
2. It is submitted that the earlier Compulsory Education Act, 1961 and the Karnataka Education Act both contained provisions for the establishing of these exclusive Attendance Authorities. However, this has been dropped from the current Rules framed by the State Government. Relevant extracts from the Karnataka Education Act are placed as **Annexure –M**.
3. It is significant that the education department does not have paid field workers such as ANMs, ASHAs, link workers in the Health department, though education is as vital as health. There should be a worker at the grassroots who is held responsible for every child out of school or given incentives for each OOSC he/she brings back to school, like the grassroots health workers given incentives for each person he/she brings for family planning.
4. Most importantly, penalties/punishments need to be foreseen for concerned officials who fail to bring back children to school as per these protocols.  As long as there are no punishments under the law, it is not possible to hold anybody accountable. In this context, we need to realize that a voluntary body like the SDMC cannot be held responsible/sent notices/ punished for this, which is what is being envisaged in the latest rules regarding SDMCs in Karnataka.
5. There is a need for officials to take suo motu action where the fundamental right of child is denied and not wait for complaints to be filed.
6. Hence it would be appropriate and necessary that this Hon’ble Court direct the State Government to either establish Attendance Authorities and enlist field staff for tackling the issue of drop-outs.

**Convergence with other departments:**

1. The government in its response to the court has mentioned that convergence is being brought between departments in the rehabilitation of OOSC. However, the convergence between departments can, and needs to happen, before the child drops out by identifying vulnerable children, with “unexcused absence” of three days, in order to retain them in school, address their problems and vulnerabilities and not allow them to drop-out. But this has nowhere been in evidence.
2. Departments, such as labour, education, Rural Development & Panchayati Raj, Women and Child Development, and Social Welfare, work in water-tight compartments without coordination and convergence of services on vulnerable and/or child labour families, which is an issue the undersigned has also highlighted in her article appearing in the Deccan Herald dated 03/06/2008, which is placed as **Annexure-N.**  The efforts by the education department to enroll drop-outs are not linked to the institutions and structures available with the Women and Child Development department, such as the district Child Welfare Committees, for enquiry into and rehabilitation of ‘neglected children’ under the Juvenile Justice Act or report cases of child labour that it comes across during its surveys to the labour department and vice versa. The social welfare or RD & PR departments may not be involved for providing assistance to the OOSC’s families.
3. The undersigned humbly submits that the ‘Suggested Preventive Protocol’ addresses this very lacuna in convergence. To bring about convergence and coordination between various departments and community participation for preventive action for children’s rights, a GP/urban ward-level Child Rights Task Force needs to be established as a Community Convergent Team. It shall consist of field-level officers of all the concerned departments, i.e., labour, education, Women and Child Development, Rural Development & Panchayati Raj, Social Welfare, etc., along with GP / ward elected representatives, NGOs, CBOs, and representatives of SDMCs of the area. The Attendance Authority shall be part of the Task Force.)
4. It suggests that the Attendance Authority should enquire into the OOSC and make a complaint to Ward committee /GP Standing Committee or Child Rights Task Force or Civic Amenities Committee at GP level as the 1st level of grievance redressal as per Section 32 of the Act.
5. If the 1st appeal fails to bring back the child, a second level of appeal at district level, could be the Child Welfare Committees (CWC) or a Quasi-Judicial Body (QJB) set up under the Juvenile Justice Act administered by the Dept. of W&CD at district level to look into violations of child rights.
6. The CWC/Quasi-Judicial body (QJB) could hear the parents and find out the reasons for the non-attendance of the child in the school. If the reasons given by the parents are economic, the CWC/QJB can sanction the preferred form of economic assistance to the family on condition that the child attends school. The assistance could be withdrawn if the child does not fulfil specified % of attendance (perhaps 85-90% attendance). Inability to fulfil the right to education could be checked through a means (income and assets) test and social vulnerabilities.
7. For the purpose of sanctioning assistance to the family of the vulnerable child, the CWC/QJB could, through the GP/urban ward-level Child Rights Task Forces, direct the concerned officials of the W&CD Dept., F&CS Dept., Social Welfare Dept., Labour Dept., SC/ST or BC/Minorities Development Corporations or local body to render the assistance under their several welfare schemes to implement the decisions taken.
8. The state-level KCPCR, currently the sole appeals authority under the RTE Act, could be the third level of appeal at State level.

**Migrant children**:

1. The government in its response has stated that tent schools are being run for migrant children. This means that they are not getting education “based on equal opportunity” as required under the UN Convention on the Rights of the Child (UNCRC) (which India has ratified) and the UNESCO Convention Against Discrimination in Education, 1960. Article 28 of the UNCRC requires States parties to make primary education compulsory and available free to all, ‘on the basis of equal opportunity’.
2. Further, under the UNESCO Convention Against Discrimination in Education, 1960, education should be of equitable quality, i.e., all children should attend full-time formal schools or their equivalent, as otherwise it leads to violation of the principles of non-discrimination and equality of opportunity.
3. Jaap E. Doek, in the interview referred to above, has stated that in many countries, parents who take children on holidays when school is on, can be prosecuted.
4. Children of parents who migrate for work for short durations of less than an academic year shall inform the school where the children are enrolled of the period of their migration. The Attendance Authority shall make arrangements for the stay of the children in free government residential schools, hostels, shelter or foster homes, or shelters-cum-schools run by NGOs for the period of their parents’ migration so that their education is not disrupted during the course of an academic year.
5. Employers/contractors taking migrant labour for short durations of less than an academic year shall also make hostel arrangements for their compulsory school-age children before taking the parents to the place of migration.
6. If the parents are migrating with an employer / contractor for a period longer than an academic year, the onus to ensure the education of the children shall be on the employer /contractor providing work at the place of migration, in the language chosen by the migrants.

**Role of School Development & Monitoring Committees SDMCs and UEE:**

1. Rather than a paid government official, the Rules say that SDMCs shall ensure that every child is enrolled in the neighbourhood school and gets quality education. It shall also see to it that there are no drop-outs and out-of-school children. It shall be sent notices and hauled up by the DDPI and CEO of the Zilla Panchayat for any violation of the Act and Rules.
2. It is submitted that that SDMCs do not have the capacity to perform these functions. Further it is not the role of the SDMCs since the RTE Act does not provide for the same, and instead provides that this shall be a function of the School Management Committee.
3. The SDMC is mainly a voluntary body consisting of parents. The parents whose children attend government schools are mostly poor who cannot forego wages and take on tasks of ensuring that there are no drop-outs, etc. They have difficulty even to attend SDMC meetings. In urban areas, these meetings are hardly taking place. The SDMC can play persuasive roles regarding OOSC but cannot be held responsible for all violations of the Act. The role envisaged for them in the parent RTE Act is that of a monitoring body**.** Most countries have an Administrative Secretary in each school who undertakes these tasks.
4. Only the HM and teachers are paid government servants in the SDMC but they cannot be expected to go door-to-door making enquiries about drop-outs and OOSC, neglecting their teaching activities. Certainly the fact that the HM, teachers and SDMCs have not been able to solve the problems of OOSC all these years, and as such there do not have the capacity to do so.
5. The Suggested Protocol by the undersigned humbly recommends that teachers, HM or SDMC should only *report* drop-outs and OOSC to an official paid government servant of the Education Department designated as Attendance Authority for every GP/ urban ward or group of wards (other than headmaster/teachers, already mentioned above).
6. The BEO, DDPI and CEO, ZP, should not be authorised to send notices or take action against the SDMC as the SDMC does not receive salaries or sitting fees, etc. Also, if there are drop-outs, or the school is dysfunctional or does not fulfil the norms, the BEO, DDPI and the CEO are themselves responsible for the state of affairs.

**State is the guardian of a minor:**

1. When attendance orders, conditional cash transfers, bridging programmes, etc., still do not bring the child back to school, these are fit cases where the state should take guardianship of the children and place them in free government hostels as per the Karnataka High Court judgement by Hon’ble Justice V. P. Mohan Kumar in 1997 in A. Sriram Babu v/s Chief Secretary to the Government of Karnataka, Bangalore,[decided on Friday, June 6, 1997 in W.P. 1351 of 1997] which states: *“..... in the case of a minor, the guardianship of a minor vests in the sovereign, i.e., the State. Hence, de hors the above provisions, it has a duty to take care about the welfare of a minor. ..... The Sovereign had entrusted the guardianship to the parents. If they fail, the Sovereign can resume the right.”*
2. This is further reinforced by Article 9(1) of the UNCRC, which states that a child may be separated from its parents, in accordance with applicable law and procedures, when such separation is necessary for the best interests of the child.
3. There is also a provision in the Rules which says that the teacher is responsible for identifying OOSC, mainstreaming them by providing special training and converging the hostel facilities of government departments, such as Social Welfare, Backward Classes and Women and Child Development, which would interfere with normal duties of teaching the regular children.

**Cost of preventive measures**

1. Currently in Karnataka, scholarships for SC/STs in Classes 1 to 7 have been increased from Rs. 75/- to Rs. 250/- per year. Scholarships for SC/STs in Classes 8-10 have been increased from Rs. 100/- to Rs. 500/- per year. This is to benefit 25 lakh students amounting to Rs. 82.5 crore annually. These amounts are woefully inadequate and do not compensate for the opportunity cost of child labour. These scholarships are also not conditional upon the child attending school, hence it is money down the drain. Ironically, a recent statement by the Social Welfare minister says that about 60,000 seats in SC/ST hostels are vacant while OOSC languish for want of their right to care, protection and development, which these hostels could provide. Copy of the news report appearing in The Hindu is placed as **Annexure – P**.
2. If aconditional pre-emptive scholarship to vulnerable children of at least Rs. 1,200/- per year (or deposit of Rs. 10,000 is made under Bhagyalakshmi-like scheme) is made in the name of these 25 lakh BPL children in every government school instead of the current meager amounts, the total cost amounts to about Rs. 300 crore. If six lakhs of these or 25% of those receiving the enhanced scholarships fail to attend school, they could be placed in the 3,819 free hostels at a cost of approx. Rs. 135 crore. The cost of rehabilitating the current OOSC of about 6 lakh children would amount to approx. Rs. 65 crore. The total requirement for scholarships plus hostel facilities for vulnerable children and rehabilitation of current OOSC comes to about Rs. 500 crore.This additional expense translates to about 0.2 % to a maximum of 0.4 % GSDP additionally, or about 2.16 to 2.6% GSDP. This is still less than half of the promised norm of providing 6% of GDP to all sectors of education. Growth in the State’s GSDP needs to get translated into a better quality of life for children.
3. This amount is a negligible amount compared to the benefit the state is going to get by ensuring free and compulsory education of each and every child in the state. As it has been shown that investment in free and compulsory education is the best investment that a country can make and it ensures returns of 700% on every rupee invested. This is more than the return that any other investment could provide.
4. The undersigned has also prepared a critique of the Rules framed under the RTE Act by the State of Karnataka and submitted the same to this Hon’ble Court wherein the suggestions were sought from the public in regard to the Rules framed by the State Government. Copy of the same is placed as **Annexure – Q**. It is prayed that the State Government is directed to consider and adopted the suggestions made by the undersigned therein.
5. It is also submitted that the undersigned has co-authored the State Action Plan on Child Labour in 2004, placed as **Annexure- R**, in which a detailed road map for eradication of child labour has been provided. However, it has not been implemented and the undersigned prays that this Hon’ble Court issue directions to the State Government to implement the said Action Plan.
6. The undersigned submits that this Hon’ble Court may be pleased to consider these submissions and pass appropriate directions as prayed for.

Place: Bangalore

Date: 20/06/2013

Smt. Katyayini Chamaraj