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**A STUDY ON STATE'S FACING ISSUES WITH INDIA'S
TRI-LANGUAGE FORMULA (TLF)**

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ABSTRACT

India enacted the Tri-Language Formula which was formulated to encourage national unity as well as promote multilingual education. While the TLF seems to be a reasonable educational policy in principle, its real-world implementation generates a form of Constitutional Asymmetry between the two groups of students who fall under it; students in States where Hindi is not the primary language (e.g., Tamil Nadu) will have to learn Hindi as a foreign language from scratch rather than from other languages that are linguistically similar. As such, there is a significant difference between Hindi speaking students learning Hindi compared to how non-Hindi speaking students must learn Hindi. The disparity that results raise significant equality and educational issues under Articles 14 and 21A of the Constitution of India, ensuring equality and free and compulsory education respectively. In addition to creating substantive inequality in educational opportunities, the TLF is likely to create a lower quality of educational experience overall for non-Hindi speaking students who are required to learn Hindi. Moreover, court rulings uphold the right of students as well as their guardians to select their medium of education. The purpose of this document is to thoroughly analyse the constitutionality of the Tri-language rule and provide evidence supporting this assertion by demonstrating that the introduction of this policy

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will significantly reduce individual (linguistic) independence, impact the quality of education, and disrupt the federal structure, particularly for states where Hindi is not a primary language.

KEYWORDS: Three Language Formula, Constitutional Asymmetry ,Article-14, Article 21A,Linguistic Rights, Educational Policy, Federalism.

INTRODUCTION:

The Tri-language formula based on the values of unity in diversity has faced active opposition from many states with strong regional language identities. Most notably, from states such as Tamil Nadu. The Kothari Commission (1964–66) led to the introduction of a language education policy framework called The Three Language Formula (TLF)², which was incorporated into the 1968 National Policy on Education³ and subsequently reiterated in the 2020 National Education Policy (NEP)⁴. The TLF mandates that students at each school in India learn three languages: (i) their mother or regional language, (ii) Hindi (for those in non-Hindi speaking states), or another Indian language (if Hindi is spoken) in those speaking states, and (iii) English. The primary goals of the TLF are to preserve the linguistic diversity found throughout India's many linguistically diverse communities; to promote national unity/ cohesion through linguistic integration; and to assist in the development of multilingual capabilities of students. Language federalism has been a subject of political, cultural, and constitutional debate for many years. One of the most controversial programs in this context is the Three Language Formula (TLF), a system of education that seeks to provide for multi-lingual competency, national cohesion, and equal representation through languages. The TLF was developed during the time of independence in India and originally set out in the National Policy on Education (1968). The three languages are (i) the regional language; (ii) Hindi

² Education Commission (1964–66), Report of the Education Commission (Kothari Commission).

³ Government of India, National Policy on Education, 1968, Part IV.

⁴ Government of India ,Ministry of Human Resource Development ,National Education Policy,2020.

(for non-Hindi speaking states) or another Indian language (for Hindi speaking states) ; and (iii) English or other modern languages⁵. The continuing challenge to three language education is also a constitutional issue, as the relationship between language in India and issues related to federal, minority rights, equality and cultural autonomy is complex.

This research focuses on criticisms related to The Three Language Formula limits to students' education and how there appears to have been an imposition of Hindi on states that do not speak Hindi; thus, increasing federal/language tensions.

OBJECTIVE:

1. To evaluate the constitutionality of the Three Language Formula concerning Article 14 of the Constitution of India as well as Article 21A of the Constitution of India.
2. To analyse the issues that students from non-Hindi speaking states confront with regards to education according to this policy.
3. To evaluate the effect of this policy on lingual rights and cultural independence.
4. To review the effect of this policy on the Federal Government of India and also on the State Government's independence in providing education.

SCOPE OF THE STUDY:

This research investigates the constitutional & educational implications of the Three Language Formula in India - focusing on non-Hindi speaking states including Tamil Nadu among others. The policy is analysed concerning equality, right to education, linguistic rights, and federal principles through constitutional provisions and other relevant judicial interpretations; it is wholly doctrinal and policy analysis only, with no empirical research being conducted.

⁵ Official Languages Act,1963;Official Languages (Amendment)Act,1967.

HISTORICAL BACKGROUND:

The longstanding history of anti-Hindi campaigns and language nationalism in Tamil Nadu has played an important role in the denial of implementing the Three Language Formula (TLF), and is reflective of a wider trend involving the Indian states and their resistance to a federal system due to the protectionism associated with each state's cultural identity and the government's tendency to centralise power. In contrast, other states, including Karnataka, Maharashtra, and West Bengal, have either accepted the TLF or have adopted conditional acceptance of it. Therefore, from an analysis of constitutional and policy documents from all of the Indian states, it is clear that Tamil Nadu is the only state in India that has officially rejected the Three Language Formula and maintains a two-language policy.

Origins in the Anti-Hindi Agitations (1930s–1965):

Since the early 20th century, Tamil Nadu has experienced many sporadic anti-Hindi protests. The protests are large-scale or violent demonstrations that involve students and other political movements over the matter of Hindi being an official language in the state of Tamil Nadu (formerly known as Madras State, and part of Madras presidency). In 1937, an agitation took place in Madras' Presidency for the first time after the introduction of compulsory teachings of Hindi in the Indian State by the Indian National Congress. The agitation met with immediate opposition from Soma Sundaramurti Bharathy, E. V. Ramaswamy (later called 'Periyar') and Others. Over a period of three years of agitation in Madras, which included the use of fasting, meetings, marching, picketing and many forms of protesting, the government caught down upon protestors by killing two people and arresting 1198 people (including children as well as women). Following the resignation of the government in 1939, mandatory Hindi education was abolished by the government in 1940. Following India's independence from Great Britain, the choice of an official language for the future Republic of India was a contentious matter during the framing of the Constitution of India. After extensive and divisive debate, it was ultimately decided

that Hindi would be the official language of India and that English would continue as an Associate (co-equal) Language for a predetermined period of 15 years. Many non-Hindi states have opposed efforts by the Government of India to make Hindi the only official language after 26 January 1965, following the effective date of the new Constitution on 26 January 1950, The Tamil nationalist DMK political party's origin can be traced back to its founder, Annadurai's involvement with anti-Hindi imposition protests from 1938 to 1940 and during the 1940s. The DMK held a large protest in Kallakudi against the change of the town's name, Kallakudi, to Dalmia Puram, in July 1953. DMK leaders believed that Ramkrishna Dalmia's naming of the town illustrated how South India has been exploited by North Indian powers.

Adoption of the Two-Language Policy:

Following the election victory of the Dravidian Party in 1967, Tamil Nadu adopted a two-language policy (Tamil and English) as opposed to the three-language national policy. The state government has consistently maintained that the imposition of Hindi will damage the identity of Tamil language speakers and dilute regional identity. Tamil Nadu politicians have reiterated that any attempts to impose the teaching of Hindi will be met with opposition as disputes between the states emerged during the 2020 National Education Policy discussions. The Indian Express (2019) reported that following widespread public outcry in Tamil Nadu, the union government stated that no language will be made compulsory. The two-language policy was seen not only as being an educational reform, but also as a means of protecting the Tamil language and identity, and regional autonomy, within the Indian union. The emphasis the State puts on the Tamil language coupled with English will help build the nation as a regionally based entity, while at the same time facilitate global connectivity. The continued use of English will ensure that Tamil students compete equally with regard to higher education, competitive examinations and employment opportunities and thus meet the demands of practical realities while resisting the imposition of Hindi as a compulsory language.

Federalism and Constitutional Autonomy:

Tamil Nadu's stance against the TLF has been characterized as both a rejection of cultural paternalism and an assertion of Federalism. According to Article 25 (of List III) Education, which includes technical education and education that prepares for university-level qualifications, is to be delivered by Governmental bodies in compliance with the provisions of Entries 63-66 of List I. Entry 25 (of List III) covers Vocational and technical training of labour has not been assigned as a subject under the TLF but rather falls under the discretionary jurisdiction of state authorities, therefore, allowing states with relatively few non-Hindi speaking people to continue providing training without any problems⁶. Publications from *The Hindu* (2020-2023), demonstrate that the Tamil Nadu state government finds the system of education under TLF to be inconsistent among the states that do not have Hindi speakers in that the states that do not require Hindi medium teachers must prepare their students to speak a southern language. The state does not believe that it is consistent or constitutional. States retain significant authority in implementation. Furthermore, sources in *The Hindu* (2020-2023) show that the State administration considers the TLF to be fundamentally unbalanced because, in practice, non-Hindi-speaking States are required to learn Hindi, whilst Hindi-speaking States are not required to acquire a southern language⁷, this discrepancy is fundamental to Tamil Nadu's constitutional critique.

LEGAL AND REGULATORY FRAMEWORK:

Violation of Article 19(1)(a) - Freedom of Expression:

State of Karnataka v. Associated Management of English Medium Primary and Secondary Schools established that parents and students are entitled to the choice of

⁶ [Constitution of India, 1950](#)

⁷ *The Hindu*, 'Tamil Nadu Reiterates Opposition to Three-Language Formula under NEP,' *The Hindu* (Chennai Edition, 16 August 2020) page 1.

the medium of instruction⁸. The occupation or selection of a language from among prescribed mediums is a choice made by an individual parent or student; thus, a state cannot impose a language on any parent or student. By compelling, indirect, the student in the non-Hindi speaking state to study Hindi this TLF is violating the linguistic freedom as an individual's right to determine the language of instruction by violating the general freedoms of expression guaranteed by Article 19(1)(a)⁹.

Article 14 - Equality Before Law:

Article 14 not only provides for formal equality, but also seeks to promote substantive equality in that no law will impose any unequal burden upon two persons who are similarly situated. The Three Language Formula (TLF) is ostensibly a neutral formula; however, its implementation causes more hardship for non-Hindi speaking States (as in the case of Tamil Nadu) than for people living in Hindi speaking states. For example, Tamil Nadu students must study Hindi and use a completely different script with a completely different grammatically linguistic structure whereas many Hindi speaking state students learn to read and write in either Sanskrit or another language which uses the same script and has a similar linguistic structure to Hindi. This difference in educational burden creates two different levels of academic difficulty for students from similarly situated geographic locations without a rational justification providing grounds for discriminating between the groups; thus, failing the test for intelligibility of differentia and the rational connection defined in law. Therefore, because of its design and implementation, TLF generates a constitutionally unequal result in relation to the concept of substantive equality provided for in Article 14¹⁰.

⁸ [State of Karnataka v. Associated Management of English Medium Primary and Secondary Schools, 2013](#)

⁹ Constitution of India, Art. 19(1)(a).

¹⁰ Constitution of India, Art. 14.

Articles 29 and 30 - Cultural and Linguistic Rights:

Together, Articles 29 and 30 provide a shield for the protection of linguistic diversity in India. They also recognize that language is integral to one's identity and autonomy, especially in the context of the federal structure of India. Articles 29 and 30 can be read together with Articles 14, 19(1)(a), and 21A, and collectively, these provisions demonstrate how a language policy should be flexible and regionally specific. Therefore, the uniform or indirectly coercive implementation of the TLF will create constitutional asymmetry by disadvantaging linguistic minorities and interfering with their rights to preserve their language and to operate educational institutions in line with cultural identity¹¹.

Article 21A - Right to Education:

The Right to Education Act, which is established under Article 21A, ensures everyone has an opportunity for a meaningful and fulfilling education. Students who do not speak Hindi will experience a significant increase in their cognitive load as well as academic pressure through the requirement to study a third language. Students with no knowledge of the script and structure of the language will face additional burdens that will take away valuable time and focus from core subjects like math and science; thus, affecting overall educational development. Educational policies that jeopardise the effective implementation and quality of learning diminish the constitutional guarantee of education as set out in Article 21A. As a result, the introduction of TLF is likely to undermine the level of educational quality available to all students in states that do not speak Hindi¹².

¹¹ Constitution of India, Art. 29&30.

¹² Constitution of India, Art. 21 A.

CHALLENGES AND EMERGING ISSUES:

Perception of Cultural Anxiety and Hindi Imposition:

One of the greatest impediments to the policy of three languages is the cultural belief that it is being used as a mechanism for imposing Hindi upon people living outside of Hindi-speaking areas (i.e., in Tamil Nadu), by way of Tamil Nadu's long history of resistance to this scheme. Although political leaders from both the government and civil society claim otherwise, students living in Hindi-speaking areas are not required to learn any of the South Indian languages. On the contrary, students living outside of Hindi-speaking areas are expected to learn Hindi, in addition to their own regional languages and English. Furthermore, this discrepancy lends credence to the belief that the three languages policy puts Hindi first and places the identity of people who speak a regional language second.

Withholding of Central Funding:

Tamil Nadu struggles with the withholding or conditional release of its central education fund; this operational problem stems from the state's inability to implement the Three-Language Policy. Reports indicated that, under the Three-Language Policy implemented by the Union Education Ministry, the continuation of funding has become contingent upon compliance with the language formula and National Education Framework. Detractors have claimed that denying funding damages schools and pupils without addressing meaningful educational outcomes. Tamil Nadu leaders refer to this practice as financial coercion.¹³

Practical Implementation Challenges:

Along with political difficulties, there are also numerous practical challenges when implementing new language programs in schools. Logistical challenges include fitting three languages into already-full school curriculums; being able to find

¹³ [Tamil Nadu vs three-language formula: A look at state's history of opposing Hindi in education and why it continues to resist - The Economic Times](#)

enough qualified teachers to teach new languages; and having enough materials; There are many issues that make it difficult to implement new language programs in a schooling system.

Emerging Issues:

1. ***Future Among the Students:*** The Three Language Formula (TLF) has been brought into question regarding its impact on pupil's educational future and also Teacher's working conditions after the National Education Policy 2020 was issued. The state government and various stakeholders believe that implementing the TLF in its full form as proposed by the Union Government would create an administrative burden due to the declarative nature of the teachings with no enforceability. The discussions that follow consider issues related to employment of teachers and performance of students based on information provided in local newspapers. Two primary areas of student resultant impact will be due to academic workload and preparation for competition. Tamil Nadu is largely a two -language state (Tamil and English) and operates based on competitive test requirements and State Board of Education.
2. ***Fear of competitive Exams among students:*** Critics argued that making Hindi a compulsory third language in particular will adversely affect both the amount of time spent on Math and Science in schools and thereby impact students' performance on the national entrance exams, such as the NEET and JEE. Public discussions that cover these issues have raised concerns that, under a three-language policy, government and rural school children (who are already facing shortages of resources) will continue to be disproportionately affected. The Hindu news organization has published some of these public discussions.¹⁴

¹⁴ The Hindu, 'Students May Face Academic Burden under Three-Language Policy, Say Experts,' *The Hindu* (Chennai Edition, 18 May 2023) Page.7

3. *Employment opportunities:* The implementation of the TLF has major financial and structural problems regarding employment by teachers. Implementing Hindi or any other third language in thousands of government schools will require thousands of competent language teachers to be hired. According to a report by the Times of India, Tamil Nadu officials have concerns regarding the cost of hiring and training large numbers of Hindi teachers due to the State's ongoing rejection of mandatory Hindi instruction. Also, ideological disagreement isn't the only thing that Tamil Nadu's Three Language Policy has to deal with; there are practical considerations, such as the academic burden, competitive equity, economic sustainability, infrastructure for teacher recruitment, and Federal autonomy. For students, their primary issue with respect to the use of a second language as a requirement for their education is whether it helps or hinders their future options. For educators, their primary issue regarding the implementation of the policy is whether it creates administrative and financial burdens or ensures stable, equitable employment structures. The current dialogue over these questions reflects the larger constitutional compromise between regional educational autonomy and the national integration goals that have been established.¹⁵

SUGGESTIONS FOR BETTER FUTURE:

To improve education in Tamil Nadu, the state needs a comprehensive plan that respects its language and cultural identity while improving education standards and supporting infrastructure. As Tamil Nadu has always used two languages, Tamil and English, the Indian government must provide support in keeping with the Constitution's recognition of federalism and cultural autonomy (not through standardisation). The following steps are examples of how policies can be implemented effectively and constitutionally.

¹⁵ The Times of India, 'State May Need Additional Language Teachers if Three-Language Policy is Implemented,' *The Times of India* (Chennai Edition, 18 June 2021) Page 5.

Enhancing Education Based on Mother Tongue:

Primary education in the mother tongue improves comprehension, cognitive development, and academic achievement, according to numerous studies. Tamil, one of the world's oldest classical languages, is crucial for developing cultural awareness and intellectual growth. Both cultural preservation and competitiveness in the global economy are ensured by supporting Tamil-medium education while maintaining English as a connecting language, even though Hindi instruction is not required, Tamil Nadu's high literacy rate and educational advancement are largely due to its strong emphasis on Tamil and English, according to reports in *The Hindu*¹⁶. The constitutional framework also supports this approach. Article 350A of the Constitution, which mandates that States provide basic education in the home tongue, reflects the significance of linguistic accessibility in education. Therefore, improving textbooks, online resources, and trained teachers to support Tamil-medium education would improve learning outcomes without compromising cultural identity.

Improving English Language Skills for International Prospects:

English is still used as a worldwide connection language and is necessary for work, technology, and higher education. Tamil Nadu's emphasis on English instruction has helped its students succeed in professions like computer technology, engineering, and medicine. The Centre may help by providing funds for digital learning platforms, teacher training programs, and English language labs. This method respects the State's language autonomy while improving employability.

Offering Financial Aid Without Restrictions on Language:

Without requiring adherence to the linguistic policy, the Union government can promote Tamil Nadu's educational advancement through officially funded programs

¹⁶ *The Hindu*, 'Tamil Nadu to Continue Two-Language Policy,' *The Hindu* (Chennai Edition, 31 July 2020) page 1.

like Samagra Shiksha which provides Infrastructure development, hiring teachers, smart classrooms, and improving rural schools should be the main priorities of financial aid. Such unrestricted assistance would uphold state sovereignty while advancing educational justice.

Encouraging Tamil Heritage and Culture in the Curriculum:

Tamil Nadu's language, literature, and history are all essential components of its cultural identity. Incorporating local history, Tamil literature, and traditional texts like Sangam poetry into the curriculum fosters students' intellectual development and cultural awareness. In accordance with Article 29 of the Constitution, which safeguards cultural and linguistic rights, the Center can help by providing funding for cultural education initiatives, digitizing Tamil manuscripts, and assisting Tamil research institutions.

Investing in Teacher Training and Employment:

Enhancing educational outcomes can be achieved most effectively by improving the quality of teachers. Tamil Nadu and the Center can work together to offer professional training courses, teaching credentials, and assistance with educational technologies. Without adding to the already heavy language load, improving teacher preparation in Tamil and English guarantees academic performance. The Hindu reports that educational experts stress that raising the caliber of teachers has a bigger effect on student performance than expanding the number of required disciplines.¹⁷

Fostering Respect for Culture and Cooperative Federalism:

The Indian Constitution creates a federal system that strikes a balance between regional autonomy and national unity. Language policy needs to take this balance into account. Tamil Nadu is committed to maintaining Tamil cultural identity rather than opposing national integration, which is seen in its opposition to the Three

¹⁷ The Hindu, 'Experts Emphasize Teacher Quality over Language Expansion,' *The Hindu* (Chennai Edition, 18 May 2023) page .7

Language Formula. National peace and cooperative federalism are strengthened when this stance is upheld.

CONCLUSION:

Tamil Nadu's two-language policy is an example of an educationally sound and constitutionally sound framework that strikes a balance between academic progress and the preservation of linguistic and cultural identity. The policy prioritizes English as a global link language and Tamil as the mother tongue, allowing kids to learn in a comfortable linguistic setting while gaining the skills required for both domestic and international prospects. This method shields students from the potential drawbacks of mandatory Hindi instruction in non-Hindi-speaking areas while reducing the academic load and enabling them to concentrate on key courses necessary for both higher education and the workforce.

