



Education of minorities in the Indo-Bhutan perspective: A comparative policy analysis of inclusion, equity, language and belonging

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Abstract

Education is more than gaining knowledge and skills. It creates opportunities, respects different identities, and enables people to participate fully in society. This study compares minority and inclusive education in India and Bhutan through a qualitative policy approach. It examines constitutional provisions, education policies, government programmes, official reports, and relevant academic studies. The comparison shows that the two countries follow different paths towards inclusion. India provides specific constitutional protection to religious and linguistic minorities and has introduced several programmes to improve educational access. However, differences in religion, caste, gender, income, location, and social background continue to shape educational opportunities. Bhutan has followed a more universal approach, influenced by the philosophy of Gross National Happiness and its focus on social well-being, cultural values, and equity. At the same time, issues related to language, citizenship, cultural identity, and the educational experiences of Lhotshampa communities remain important concerns. The study suggests that educational inclusion requires both universal provision and focused support for groups facing particular disadvantages. Greater attention is also needed to multilingual education, culturally relevant curricula, fair use of resources, and community involvement in educational decisions. India can learn from Bhutan's emphasis on holistic development and well-being, while Bhutan can draw useful lessons from India's constitutional recognition of minority educational and cultural rights. Overall, inclusion should not be judged by enrolment alone. A truly inclusive education system should help learners remain in education, learn effectively, participate equally, and feel respected and accepted within the educational community.

Keywords: Minority education, inclusive education, educational equity, India, Bhutan, language policy, Gross National Happiness, social belonging

Introduction

Education plays a central role in shaping both individual development and the wider social structure. It provides learners with knowledge and skills, but its influence extends beyond academic learning. Educational institutions also affect how languages, cultures, histories, and identities are represented and understood within society. For minority communities, therefore, educational inclusion cannot be measured simply by the availability of schools, colleges, or seats. It also involves whether learners are able to enter educational institutions, participate, continue their studies, achieve appropriate learning outcomes, and feel that their cultural and social identities are respected. This broader understanding is consistent with UNESCO's emphasis on addressing barriers associated with language, religion, ethnicity, poverty, geographical location, and displacement when promoting inclusive and equitable education (UNESCO, 2020)^[2].

India and Bhutan offer an interesting basis for comparison because, despite their geographical proximity and shared South Asian context, their approaches to education and diversity have developed within different political and institutional settings. India's constitutional framework explicitly acknowledges the cultural and educational interests of religious and linguistic minorities. Articles 29 and 30 of the Constitution provide important safeguards relating to the preservation of distinct languages, scripts and

cultures and the establishment and administration of minority educational institutions. In addition, Article 21A establishes the constitutional right to education for children within the specified age group (Government of India, 1950)^[9]. These constitutional provisions have been complemented by the Right of Children to Free and Compulsory Education Act, 2009^[10], and the National Education Policy 2020^[2], both of which place considerable emphasis on access, equity, quality and inclusion in education (Government of India, 2009, 2020)^[2, 10]. However, the existence of constitutional safeguards and educational policies does not necessarily result in equal educational experiences for all sections of society. Previous research has demonstrated that educational opportunities and attainment in India continue to differ according to social background, religion, caste, gender, place of residence, and household circumstances (Asadullah & Yalonetzky, 2012; Borooah & Iyer, 2005; Tilak, 2015)^[3, 6, 31]. Evidence from Uttar Pradesh further indicates that differences in participation in higher education cannot be explained by household economic conditions alone. Religious and caste background may continue to influence the likelihood of entering higher education even when improvements in household income are taken into account (Khan, 2023)^[15]. Such findings suggest that educational disadvantage is shaped by a combination of economic, social and institutional factors rather than by financial circumstances alone.

Bhutan presents a somewhat different educational context. The development of its modern education system has been closely associated with national development, cultural preservation and the philosophy of Gross National Happiness. Rather than viewing education solely in terms of economic productivity, Bhutanese educational thinking has given considerable attention to cultural values, social responsibility and the broader well-being of learners and communities (Schuelka, 2012; Wangyal, 2001) ^[29, 34]. The expansion of public education and the country's emphasis on holistic development provide an important perspective for understanding inclusive education. At the same time, the Bhutanese experience also raises questions about the balance between national cultural integration and the recognition of linguistic and cultural diversity. These concerns are particularly relevant to the experiences of Nepali-speaking Lhotshampa communities, whose history has been associated with disputes concerning citizenship, cultural identity, displacement, and language (Hutt, 2003) ^[13]. A comparison of India and Bhutan is therefore useful not because one country necessarily provides a superior model, but because their different approaches highlight important dimensions of educational inclusion. India demonstrates the significance of explicit constitutional recognition and targeted measures for disadvantaged communities, whereas Bhutan provides an example of a more broadly integrated approach in which education is connected with cultural values and holistic well-being. Examining these approaches together makes it possible to consider how universal educational provision, targeted assistance, language policy, cultural recognition and social belonging interact in practice.

The present study consequently views inclusion as more than the formal availability of educational opportunities. A learner may have access to a school or college and yet encounter barriers related to language, economic circumstances, social identity, documentation, curriculum or institutional attitudes. Genuine inclusion requires educational systems to identify such barriers and create conditions in which different groups can participate on equitable terms. This study therefore argues that universal educational rights and group-sensitive measures should complement, rather than replace, one another. Such a combined approach can provide a common educational foundation while also responding to the particular circumstances of communities that experience persistent disadvantage.

Review of Related Literature

The literature on minority and inclusive education suggests that access alone does not ensure educational equality. Learners may continue to face barriers related to religion, caste, language, socio-economic status, location, and cultural background. UNESCO (2020) therefore emphasises inclusion, recognition, and participation. In India, studies by Borooah and Iyer (2005), Asadullah and Yalonetzky (2012), and Kingdon (2007) ^[3, 6, 16] show persistent differences in educational opportunities, participation, and outcomes. Pieters (2011) ^[26] and Govinda and Bandyopadhyay (2010) ^[12] further highlight the influence of economic inequality and social exclusion, indicating that educational disadvantage often results from the interaction of multiple social and economic factors.

Table 1: Selected Literature Relevant to Minority and Inclusive Education in India and Bhutan

No.	Study/Source	Context	Key Finding	Relevance to Present Study
1	Borooah & Iyer (2005) ^[6]	India	Religion and caste are associated with differences in educational participation.	Establishes the social dimension of educational inequality.
2	Kingdon (2007) ^[16]	India	Expansion of schooling improved access, but retention, attendance and quality remained concerns.	Supports the argument that inclusion extends beyond enrolment.
3	Govinda & Bandyopadhyay (2010) ^[12]	India	Social and institutional factors continue to exclude disadvantaged learners despite educational expansion.	Provides a basis for analysing inclusion as a process.
4	Pieters (2011) ^[26]	India	Household economic inequality is strongly associated with educational attainment.	Highlights the economic dimension of minority disadvantage.
5	Asadullah & Yalonetzky (2012) ^[3]	India	Educational opportunities vary substantially across regions and social contexts.	Supports geographical and structural comparison.
6	Naseem (2011) ^[23]	India	Minority education is shaped by social, economic and institutional conditions.	Directly supports the minority-education focus.
7	Sachar Committee (2006) ^[27]	India	Muslims experienced significant disadvantages in education and socio-economic development.	Provides foundational policy evidence for India's targeted minority measures.
8	Ranganath Misra Commission (2007) ^[24]	India	Religious and linguistic minorities require measures to improve educational and social opportunities.	Strengthens the legal and policy dimension of minority inclusion.
9	Tilak (2015) ^[31]	India	Expansion of higher education has not produced equal benefits across social and economic groups.	Distinguishes educational expansion from substantive equity.
10	Varughese & Bairagya (2020) ^[33]	India	Group-based educational inequalities continue despite policy interventions.	Helps assess the effectiveness and limits of targeted policies.
11	Government of India (2020), NEP 2020 ^[2]	India	Emphasizes equity, inclusion, multilingualism and culturally responsive education.	Central to analyzing language, equity and inclusion.
12	Borah & Kundu (2022) ^[5]	India	Educational inequality reflects multiple social and demographic factors rather than a single disadvantage.	Supports the study's multidimensional framework.
13	Khan (2023) ^[15]	Uttar Pradesh, India	Caste and religion continue to influence higher-education participation alongside economic factors.	Provides recent evidence relevant to minority participation in UP.
14	Ahmad, Ayat, & Gardia (2026) ^[1]	India	Muslim participation in higher education remains below proportional representation; economic vulnerability, geography, affordability, and institutional support affect participation and progression.	Directly supports analysis of minority participation, equity, and policy effectiveness.

15	Ahmad, Khatoon, Ayat, & Gardia (2026) ^[1]	Uttar Pradesh, India	NEP 2020 provides an inclusive policy framework, but regional, socio-economic, digital and institutional inequalities remain.	Highly relevant to inclusion, equity and implementation of minority-sensitive policy.
16	Reddy (2017) ^[28]	India	Minority educational institutions have a distinctive constitutional and institutional position.	Supports comparison of minority rights and institutional autonomy.
17	Schuelka (2012) ^[29]	Bhutan	Bhutan expanded educational access while maintaining strong cultural and national priorities.	Provides a foundation for understanding Bhutan's inclusion model.
18	Wangyal (2001) ^[34]	Bhutan	Education involves a continuing relationship between modernization, cultural transmission, and national identity.	Connects education with culture and belonging.
19	Chhetri (2013) ^[7]	Bhutan	Education is linked with Gross National Happiness and broader national well-being.	Broadens the meaning of educational success beyond enrolment.
20	Hutt (2003) ^[13]	Bhutan	Citizenship, language and cultural politics affected Nepali-origin/Lhotshampa communities.	Essential for analyzing language, identity, recognition, and belonging.
21	Subba (2014) ^[30]	Bhutan	Cultural politics and education are closely connected in Bhutan.	Helps examine the tension between cultural integration and recognition of diversity.
22	Dema, Klibthong, & Srisurakul (2022) ^[8]	Bhutan	Teacher knowledge and differentiated instruction are important for responding to learner diversity.	Demonstrates that inclusion depends on classroom practice as well as policy.
23	Jigyel, Lhendup, & Tshomo (2025) ^[14]	Bhutan	Policy and implementation gaps continue to affect vulnerable learners, including children with disabilities.	Shows the limits of universal provision without targeted support.
24	UNESCO (2020)	International	Genuine inclusion requires removing barriers related to poverty, language, ethnicity, disability, location and other forms of disadvantage.	Provides the overarching conceptual framework for the India–Bhutan comparison.

The reviewed literature shows that educational inclusion involves more than access; it also concerns participation, equality and belonging. In India, religion, caste, socio-economic conditions and location influence opportunities.

Bhutan emphasizes universal education, cultural continuity and well-being. However, universal provision may not ensure equal experiences, particularly regarding language, identity and cultural recognition.

Table 2: Major Themes Emerging from Previous Studies

Theme	What Previous Literature Shows	Implication for Present Research
Access and participation	Expansion of educational access does not necessarily eliminate differences in attendance, retention, progression and completion.	The study examines inclusion beyond enrolment.
Social and economic inequality	Religion, caste, household circumstances, gender, geography and socio-economic conditions can interact in shaping educational opportunities.	Educational disadvantage is treated as multidimensional.
Minority rights	India has an explicit constitutional framework for religious and linguistic minority educational rights.	India's rights-based model is compared with Bhutan's broader universal approach.
Universalism	Universal provision can create a common educational foundation but may not reveal the experiences of particular disadvantaged communities.	The study examines whether universal provision is sufficient for substantive inclusion.
Targeted intervention	Targeted programmes can address barriers experienced disproportionately by particular communities, but their effectiveness depends on implementation and monitoring.	The study considers the strengths and limitations of India's targeted approach.
Language	Language of instruction can influence learning, participation, identity and relationships between schools and communities.	Language is treated as a central dimension of educational equity.
Culture and curriculum	Education can strengthen cultural continuity but may also create tensions when one cultural identity becomes dominant.	The study examines cultural recognition and curriculum representation.
Citizenship and belonging	The Bhutanese experience demonstrates that citizenship and cultural identity can have consequences for social and educational participation.	Belonging is incorporated into the conceptual framework.
Teacher capacity	Inclusive policy requires teachers who can respond to differences among learners.	Policy analysis is connected with classroom-level implementation.
Financing and accountability	Government allocation alone cannot demonstrate educational impact; implementation, reach and outcomes also need to be examined.	The study distinguishes financial allocation from actual educational outcomes.

Research Gap

Although research on educational inequality, minority education in India, and inclusive education in Bhutan is growing, comparative work examining these issues together remains limited. Studies on India mainly discuss minority rights, social disadvantage, and targeted educational programmes, while research on Bhutan gives greater attention to universal education, cultural values, well-being, and social inclusion. These different approaches have rarely been examined within a common framework. A further gap concerns the way educational inclusion is understood.

Enrolment, literacy, institutional access, and public expenditure are useful indicators, but they do not fully reflect students' educational experiences. Issues such as language, cultural recognition, equal participation, progression, and a sense of belonging also need attention. In addition, relevant evidence is scattered across government documents, policy reports, statistical publications, international sources, and academic studies.

The present study addresses these gaps by bringing these sources together and comparing the educational approaches of India and Bhutan. It considers both universal educational

provision and targeted support and examines inclusion through access, participation, learning, recognition, representation, and belonging. This broader comparison provides a clearer understanding of the strengths, limitations, and possible policy lessons emerging from the two countries.

Objectives of the Study

1. To examine and compare the major legal and policy provisions related to minority and inclusive education in India and Bhutan.
2. To explore the major social, cultural, linguistic, geographical and economic factors that shape educational access and inclusion among diverse communities in the two countries.
3. To examine the differences between India's targeted measures for minority communities and Bhutan's broader approach to universal and equitable education, and to identify relevant policy lessons from both contexts.

Research Questions

1. How do India and Bhutan address the educational needs of minority and socially marginalized communities through their respective policies and institutional frameworks?
2. What social, cultural, linguistic, geographical and economic factors create barriers to equal educational participation and inclusion in India and Bhutan?

Methodology

The study employs a qualitative comparative policy-analysis approach to examine minority and inclusive education in India and Bhutan. It relies on documentary and scholarly sources rather than primary survey or experimental data. The evidence includes constitutional and legislative provisions, national education policies, government programme documents, official statistics, reports from international organizations such as UNESCO, the World Bank and the Asian Development Bank, and relevant academic literature. The comparison focuses on six broad areas: legal recognition, educational access and participation, targeted support, language and curriculum, cultural belonging and citizenship, and financing and accountability. Primary and official sources are used mainly for policy, legal, and statistical information, while academic studies provide contextual and analytical perspectives. The study is interpretive and comparative rather than causal. Since India and Bhutan use different categories for identifying disadvantaged or minority communities, direct statistical comparisons are made cautiously. In the case of Bhutan, the discussion therefore refers to ethnic, linguistic, and historically marginalized communities rather than applying India's minority classification directly. Similarly, Indian Ministry of Minority Affairs budget allocations are treated as overall ministry allocations and not as direct measures of expenditure on minority education.

Conceptual Framework: From Access to Belonging in Indo-Bhutan

This study understands educational inclusion as a continuous process, rather than simply measuring whether students have access to education. It develops through five connected stages:

Access → Participation → Quality → Recognition → Belonging

- **Access:** Opportunity to enter school or higher education.
- **Participation:** Regular attendance, academic progress and completion.
- **Quality:** Effective teaching, infrastructure and learning resources.
- **Recognition:** Respect for language, culture and identity.
- **Belonging:** Feeling accepted, valued and able to participate without compromising one's identity.

This framework reflects the view that enrolment alone does not guarantee inclusion; barriers such as poverty, language, discrimination, disability, location and documentation may continue to affect learners (UNESCO, 2020). In comparison, India emphasizes minority recognition and targeted support, while Bhutan focuses more on universal provision, cultural continuity and holistic well-being. The common challenge is to turn these policy strengths into meaningful educational experiences for disadvantaged learners.

Education and Minority Inclusion in India

1. Constitutional and Legislative Foundations

India has a strong legal foundation for minority education. Articles 29 and 30 protect the cultural and educational rights of religious and linguistic minorities (Government of India, 1950) ^[9]. These provisions are supported by the Right to Education Act, 2009, and NEP 2020 ^[2, 10], which emphasize universal access, equity, multilingualism, and support for disadvantaged groups (Government of India, 2009, 2020) ^[2, 10]. However, legal protection alone cannot ensure equal educational outcomes, as differences related to social background, caste, religion, gender, location, and economic conditions continue (Asadullah & Yalonetzky, 2012; Borooah & Iyer, 2005; Tilak, 2015) ^[3, 6, 31].

2. Educational Inequality

Census and AISHE data show variations in educational participation and attainment across communities and regions (Office of the Registrar General & Census Commissioner, India, 2011; Ministry of Education, 2024, 2026) ^[17, 20, 23]. Research suggests that minority disadvantage is influenced by several factors, including household conditions, institutional quality, location, awareness, and possible discrimination (Khan, 2023) ^[15]. Thus, financial assistance alone is insufficient; infrastructure, counselling, teacher preparation and learning support are also necessary.

3. Targeted Interventions

India combines universal education policies with targeted measures for disadvantaged minority communities. Programmes such as PM VIKAS and PMJVK provide educational, infrastructural and developmental support (Ministry of Minority Affairs, n.d., 2026) ^[21]. Policy interventions have evolved, with several schemes being consolidated or redesigned. The Ministry of Minority Affairs allocation increased from ₹3,183.24 crore in 2024–25 to ₹3,350 crore in 2025–26. However, these figures represent the ministry's overall budget and should not be interpreted as education-specific expenditure.

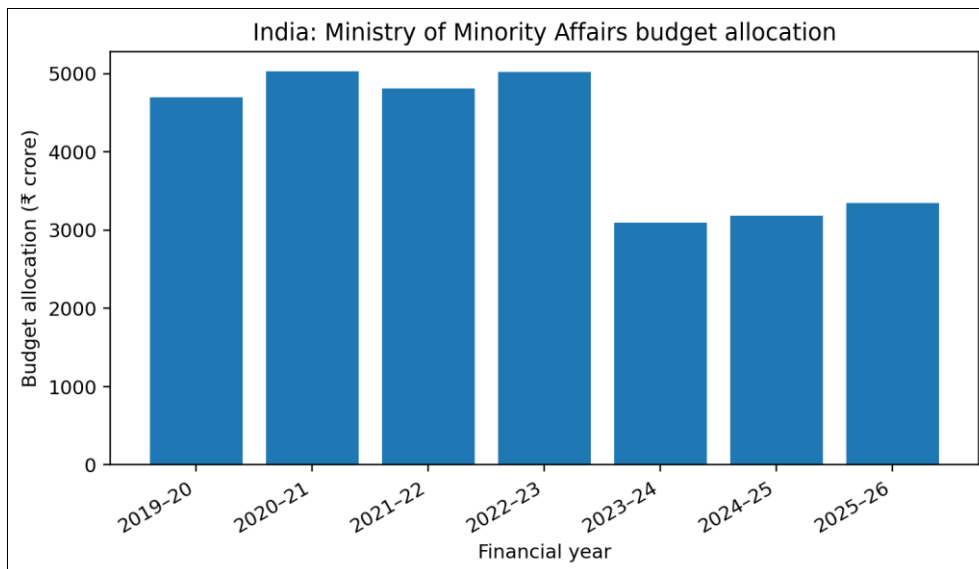


Fig 1: Ministry of Minority Affairs budget allocation, India, 2019–20 to 2025–26.

Note: The figures represent the ministry's overall budget allocations in crore, compiled from the Government of India budget and parliamentary documents. They should not be interpreted as expenditure exclusively directed towards minority education.

4. Language and Cultural Inclusion in India

Language is an important dimension of educational inclusion in India because of the country's considerable linguistic diversity. The National Education Policy 2020 [2] places strong emphasis on multilingual education and encourages the use of children's home, local, or mother tongues, particularly in the early stages of learning. The policy also promotes the development of learning materials in Indian languages and greater inclusion of local, traditional, and tribal knowledge within education (Government of India, 2020) [2]. However, policy recognition alone does not necessarily translate into an inclusive classroom experience. Students may face difficulties when the language spoken at home differs substantially from the principal language used for instruction. These challenges can affect comprehension, classroom participation, and academic progression. Consequently, effective multilingual education requires more than the formal recognition of different languages. It depends on the availability of appropriately trained teachers, suitable textbooks and digital resources, language-sensitive assessment practices and clear pathways for students to move between different languages of instruction. From an inclusion perspective, the central issue is therefore the capacity of educational institutions to respond effectively to linguistic diversity. This reinforces the wider argument that inclusion should be assessed not simply by the existence of supportive policies, but by the extent to which those policies improve learners' actual educational experiences and opportunities (UNESCO, 2020) [33].

Education and Minority/Community Inclusion in Bhutan

1. Education, Nation Building and Gross National Happiness

Education in Bhutan has expanded alongside the country's goals of national development, cultural preservation and

Gross National Happiness (GNH). The system has gradually moved towards wider access while maintaining attention to cultural values and social well-being (Schuelka, 2012; Wangyal, 2001) [29, 34]. However, maintaining national cultural identity while recognizing diverse communities remains an important challenge. Current education statistics provide useful information on enrolment, teachers and institutions (Ministry of Education and Skills Development, Bhutan, 2024, 2025) [14, 17].

2. Lhotshampa Experience, Language and Citizenship

The experience of the **Lhotshampa community** highlights the relationship between education, language, citizenship and cultural identity. Hutt (2003) [13] documents citizenship disputes, cultural tensions and displacement affecting Nepali-origin populations. These experiences demonstrate that language policy and educational access can be closely connected with wider questions of identity and belonging. A balanced multilingual approach could support national cohesion while recognizing linguistic diversity.

3. Inclusive education Beyond Minority Identity

Inclusion in Bhutan also concerns learners with disabilities and other vulnerable groups. Research highlights continuing barriers despite the country's universal education approach (Jigyel *et al.*, 2025). Dema *et al.* (2022) [8, 14] emphasize the importance of teachers' ability to address diverse learning needs. Strengthening disaggregated data, teacher capacity, and targeted support can help ensure that universal education responds effectively to learners requiring additional assistance.

India-Bhutan Comparative Analysis

The comparison between India and Bhutan reveals two different, but partly complementary, approaches to educational inclusion. India has developed a relatively explicit framework for recognizing religious and linguistic minorities and combines this with universal education programmes and targeted interventions. Bhutan, in contrast, places greater emphasis on universal provision, equity and the relationship between education, cultural continuity and well-being. These differences provide useful insights into how educational systems can respond to diversity.

Table 3: India-Bhutan Comparative Analysis

Dimension	India	Bhutan
Legal recognition	Religious and linguistic minorities receive explicit constitutional protection, particularly through Articles 29 and 30.	Education is primarily framed through universal constitutional and policy commitments rather than an equivalent minority classification system.
Policy orientation	Combines universal educational programmes with targeted measures for minority and disadvantaged communities.	Emphasizes Indo-Bhutan broadly universal and equity-oriented provision connected with national development and well-being.
Major identity concerns	Religion, language, caste, gender and socio-economic circumstances can interact to influence educational opportunities.	Ethnicity, language, citizenship, geographical location and cultural integration are particularly significant.
Language	NEP 2020 promotes multilingual education and greater use of home or local languages where feasible.	Dzongkha has an important position within national education, while the status of Nepali has particular historical significance for Lhotshampa communities.
Targeted support	Scholarships, infrastructure programmes and minority-focused initiatives operate alongside universal schemes.	Equity is largely incorporated into mainstream provision, with attention to geographical and resource-related differences.
Principal challenge	Constitutional rights and policy provisions may coexist with unequal educational outcomes and differences in implementation.	A strong universal approach may make the particular disadvantages of some communities less visible without adequate disaggregated evidence.
Distinctive strength	Explicit recognition of cultural and educational pluralism and minority institutional rights.	A holistic understanding of education that connects learning with well-being, cultural continuity and social responsibility.

1. Access and Participation

India's large and diverse education system continues to face differences in participation and outcomes across social, economic and geographical groups. Despite improvements in school access, challenges remain in attendance, retention, quality and progression (Kingdon, 2007) ^[16], with recent studies also reporting disparities linked to religion and other social factors (Borah & Kundu, 2022; Khan, 2023) ^[5, 15]. Bhutan has achieved relatively high levels of educational participation, with secondary enrolment reaching about 90% in 2022. However, national averages may hide differences related to remoteness, household conditions, language and other forms of disadvantage (Asian Development Bank, 2026; World Bank, 2026) ^[4].

2. Targeted and Universal Approaches

The policy difference between India and Bhutan is mainly one of emphasis rather than a strict targeted-versus-universal divide. India combines universal education with targeted support for disadvantaged minorities, while Bhutan largely integrates inclusion within universal provision. India makes group-specific disadvantage more visible, whereas Bhutan emphasizes social cohesion and mainstream inclusion. However, broad approaches may overlook specific inequalities when data are not sufficiently disaggregated. A balanced approach could therefore combine universal educational rights with targeted support for communities facing persistent barriers. This would promote equal access while recognizing that formally equal provision does not always produce equal educational outcomes (UNESCO, 2020) ^[33].

3. Language, Curriculum and Representation

Language is a key area of comparison between India and Bhutan. India recognizes linguistic diversity and promotes multilingual education, including home and local languages under NEP 2020 ^[2]. Bhutan places stronger emphasis on a shared national culture, with Dzongkha central to formal education, while the position of Nepali remains important for Lhotshampa communities. Both countries face the challenge of balancing national identity with linguistic diversity. Inclusive curricula should therefore represent minority histories, languages and cultural contributions

meaningfully. India can strengthen such representation, while Bhutan can ensure that national cultural education also reflects the experiences and identities of diverse communities.

4. Financing and Accountability

Financial allocations indicate policy priorities but do not necessarily demonstrate educational outcomes. India's Ministry of Minority Affairs allocation increased from ₹3,183.24 crores in 2024-25 to ₹3,350 crore in 2025-26, although these amounts cover multiple programmes. Bhutan has no equivalent separate budget category for minority education, making it important to assess whether universal education resources reach disadvantaged learners. India needs stronger evidence that targeted programmes reach beneficiaries and improve outcomes, while Bhutan needs better identification of inequalities within its universal model. In both countries, accountability should link funding with enrolment, retention, completion, learning and inclusion.

Key Findings

The key findings of this study can be presented as follows:

1. The comparison of India and Bhutan shows that educational inclusion cannot be understood only in terms of enrolment or physical access to educational institutions. Students also need opportunities to participate, learn effectively, progress in their studies and experience respect for their language, culture and identity. A truly inclusive system should also help learners develop a sense of acceptance and belonging.
2. India has a relatively strong constitutional framework for protecting the educational interests of religious and linguistic minorities. However, the continued differences in educational participation associated with social and economic circumstances indicate that legal protection alone is not enough to achieve equal outcomes. Effective implementation and sustained institutional support remain important.
3. Bhutan provides a different perspective through its emphasis on universal education, well-being, cultural continuity and national development. This approach has important strengths, but it also requires careful attention

to communities that may experience disadvantage because of language, culture, location or other circumstances. Universal policies are most effective when they are supported by evidence that makes such differences visible.

4. Language also emerges as an important part of educational equity. The language used in teaching can influence how easily students understand lessons, participate in classrooms and maintain connections with their families and communities. Language planning should therefore be considered an essential element of inclusive education.
5. The findings further indicate that targeted assistance is most useful when it works alongside universal public education. Scholarships, infrastructure support and other focused interventions can help address particular barriers, but they cannot substitute for accessible and good-quality schools and colleges.
6. Citizenship and documentation may also affect educational opportunities, particularly for communities experiencing displacement or legal uncertainty. In such situations, protecting children's and young people's continued access to education becomes especially important.
7. Government funding should similarly be assessed in terms of its actual implementation and results. Higher allocations do not necessarily mean greater educational equity unless resources reach the intended beneficiaries and contribute to improvements in participation, retention, completion and learning.

Overall, India and Bhutan offer different but complementary lessons. India's experience highlights the importance of formal minority rights and targeted support, while Bhutan demonstrates the value of connecting education with well-being, cultural continuity and universal provision. The comparison suggests that a balanced approach should combine broad educational rights with appropriate responses to the specific barriers faced by different communities. Inclusion should ultimately be judged not only by who enters education, but also by who can participate, succeed, be recognized, and feel that they belong.

Discussion

The findings suggest that neither a purely universal approach nor an entirely group-specific model can adequately address the complexities of educational inclusion. Providing the same educational opportunity to everyone establishes an important foundation for equality, but learners do not necessarily begin from comparable social, economic, linguistic or geographical circumstances. Conversely, creating a separate programme for every disadvantaged group may lead to fragmented interventions and weaken the broader public education system. A more practical approach is therefore to combine universal educational rights with targeted measures where clear and persistent barriers are identified. India provides a useful illustration of both the possibilities and limitations of targeted intervention. Constitutional safeguards give minority communities an important basis for protecting their cultural and educational interests, while scholarships, infrastructure initiatives and other support programmes can address particular disadvantages. However, continuing

differences in educational participation suggest that targeted assistance cannot operate effectively in isolation. Financial support needs to be accompanied by improvements in school quality, teacher capacity, academic guidance, institutional infrastructure and awareness among families and learners. There is also a need for better coordination among programmes so that policy interventions are not unnecessarily fragmented and their outcomes can be evaluated more clearly.

Bhutan presents a different set of opportunities and challenges. Its education system, influenced by the philosophy of Gross National Happiness, gives considerable importance to well-being, cultural values and social responsibility alongside academic development. Such an approach offers a broader understanding of educational success and can contribute to social cohesion. However, the pursuit of a shared national identity can become challenging when cultural integration leaves insufficient space for diverse linguistic or cultural experiences. The historical experiences of Lhotshampa communities demonstrate why issues of language, citizenship, cultural recognition and representation remain relevant to discussions of educational inclusion (Hutt, 2003) ^[13]. The comparison therefore points towards the value of a hybrid approach to educational inclusion. Universal provision should establish a minimum standard of educational rights and opportunities for all learners, while equity-oriented mechanisms should identify communities or individuals who continue to face particular barriers. For such a model to work effectively, governments need reliable disaggregated data, meaningful community participation, appropriate multilingual learning resources, well-prepared teachers and transparent systems for monitoring implementation and outcomes.

This interpretation is consistent with the wider international understanding of inclusion, which emphasizes removing barriers to participation and recognizing learner diversity rather than treating inclusion simply as an increase in enrolment (UNESCO, 2020) ^[32]. Ultimately, the effectiveness of an education system should be judged not only by how many learners it reaches, but also by whether different groups can participate, learn, progress and experience education with dignity and a genuine sense of belonging.

Policy Recommendations

Based on the comparative findings, the following measures could help strengthen educational inclusion in India and Bhutan:

1. Inclusion should be assessed beyond enrolment. Attendance, learning, completion, further progression and students' feeling of belonging should also be considered.
2. Educational data should be collected and analyzed across religion, gender, caste, region, language, disability and socio-economic background, with proper protection of personal information.
3. Greater attention should be given to multilingual education. Teachers, learning materials, digital content and assessment methods should support students who study in a language different from their home language.
4. Universal access should be combined with targeted support. All students should receive quality education, while those facing greater disadvantages should get additional financial and institutional assistance.

5. Educational schemes should be judged by their results. Retention, completion, participation and learning outcomes are more meaningful measures than the amount of money allocated alone.
6. Teaching and curriculum should reflect the experiences of different communities. Their languages, histories, knowledge and contributions should have a meaningful place in education.
7. Educational access should continue even when students face displacement, documentation problems or citizenship-related difficulties. Such issues should not unnecessarily interrupt their education.
8. India and Bhutan can learn from each other through joint research and exchange of good practices, particularly in multilingual education, teacher preparation, digital learning and inclusive teaching.
9. Students, parents, teachers and local communities should have a greater role in educational planning. Their experiences can help identify barriers and improve the implementation of policies.

Limitations of the Study

The study relies on documentary analysis and cross-country comparison rather than primary data from interviews, surveys or classroom observations. Therefore, the findings represent policy-based evidence rather than learners' direct experiences. Differences in how India and Bhutan classify minority and marginalized groups also limit direct statistical comparison. In addition, available data cover different years and use varying definitions, making a single comparative index inappropriate. Budget figures mainly reflect planned allocations and may not indicate actual utilization or impact. Future research could address these limitations through primary data, scheme-level expenditure analysis, implementation records and beneficiary perspectives.

Conclusion

The comparison of India and Bhutan shows that educational inclusion involves more than ensuring that learners have access to schools and other educational institutions. It also concerns how opportunities are distributed, how differences are recognized and whether learners feel accepted within the educational system. India has established a comparatively strong constitutional foundation for protecting the educational and cultural interests of minorities and has developed targeted interventions alongside universal education policies. Its continuing challenge is to ensure that these legal protections and programmes produce more equitable participation, progression and learning outcomes. Bhutan represents a different policy orientation, linking education with well-being, cultural continuity, social responsibility and universal provision. This approach offers valuable insights into the possibility of understanding educational development in broader social and human terms. At the same time, Bhutan's experience demonstrates the importance of ensuring that efforts to strengthen national cohesion do not unintentionally reduce the visibility of communities with distinct linguistic or cultural backgrounds.

Neither country provides a model that can simply be transferred to the other. India's experience offers useful lessons for Bhutan concerning the formal recognition of diversity and the development of mechanisms that can respond to group-specific disadvantage. Bhutan, in turn,

offers India an important perspective on connecting education with well-being, cultural values and broader social development. The most appropriate approach is therefore adaptation rather than direct replication. Ultimately, an inclusive education system should do more than open the doors of educational institutions. It should enable learners to enter, participate, remain, learn and progress, while also ensuring that their language, culture and identity are treated with dignity. In this sense, access represents the foundation of inclusion, whereas equity, recognition, meaningful participation and belonging provide the stronger measure of whether inclusion has actually been achieved.

References

1. Ahmad I, Ayat MZ, Gardia A. Policy shifts, post-pandemic shock, and the minority participation deficit: An empirical analysis of Muslim student enrolment in Indian higher education. *AD EDUXIAN Journal*, 2026;3(2):594–603. <https://doi.org/10.5281/zenodo.21361718>
2. Ahmad I, Khatoon R, Ayat MZ, Gardia A. Social inclusion and equity in India: An analysis of the National Education Policy 2020 with special reference to higher education in Uttar Pradesh. *International Journal of Humanities and Social Science Research*, 2026;12(3):362–369. <https://doi.org/10.66856/ijhssr.2026.12.3.12317>
3. Asadullah MN, Yalonetzky G. Inequality of educational opportunity in India: Changes over time and across states. *World Development*, 2012;40(6):1151–1163. <https://doi.org/10.1016/j.worlddev.2011.11.008>
4. Asian Development Bank. Bhutan and ADB. Asian Development Bank, 2026. <https://www.adb.org/where-we-work/bhutan>
5. Borah R, Kundu S. An overview of educational inequality in India: The role of social and demographic factors. *Frontiers in Education*, 2022;7:871043. <https://doi.org/10.3389/educ.2022.871043>
6. Borooah VK, Iyer S. Vidya, Veda, and Varna: The influence of religion and caste on education in rural India. *The Journal of Development Studies*, 2005;41(8):1369–1404. <https://doi.org/10.1080/00220380500186960>
7. Chhetri R. Education and Gross National Happiness in Bhutan: A case study of Zhemgang High School. *Journal of Bhutan Studies*, 2013;29:1–24.
8. Dema D, Klibthong S, Srisurakul T. Exploring Bhutanese teachers' perceptions of differentiated instruction in inclusive schools in Bhutan. *Australasian Journal of Special and Inclusive Education*, 2022;46(1):88–100. <https://doi.org/10.1017/jsi.2022.4>
9. Government of India. The Constitution of India. Ministry of Law and Justice, 1950. <https://legislative.gov.in/constitution-of-india>
10. Government of India. The Right of Children to Free and Compulsory Education Act, 2009. Ministry of Law and Justice, 2009. <https://legislative.gov.in/sites/default/files/A2009-35.pdf>
11. Government of India. National Education Policy 2020. Ministry of Education, 2020. https://www.education.gov.in/sites/upload_files/mhrd/files/NEP_Final_English.pdf

12. Govinda R, Bandyopadhyay M. Social exclusion and school participation in India: Expanding access with equity. *Prospects*,2010;40(3):337–354. <https://doi.org/10.1007/s11125-010-9160-8>
13. Hutt M. *Unbecoming citizens: Culture, nationhood, and the flight of refugees from Bhutan*. Oxford University Press, 2003. <https://doi.org/10.1093/acprof:oso/9780195670608.001.0001>
14. Jigyel K, Lhendup K, Tshomo U. Towards inclusive education in Bhutan: Addressing policy and practice gaps in reintegrating out-of-school children with disabilities. *Bhutan Journal of Research and Development*,2025;14(1):84–102. <https://doi.org/10.17102/bjrd.rub.14.1.005>
15. Khan K. The impact of caste and religious background on participation in higher education: Evidence from Uttar Pradesh in India. *Journal of Social and Economic Development*,2023;25:70–85. <https://doi.org/10.1007/s40847-022-00220-1>
16. Kingdon GG. The progress of school education in India. *Oxford Review of Economic Policy*,2007;23(2):168–195. <https://doi.org/10.1093/oxrep/grm015>
17. Ministry of Education and Skills Development, Bhutan. Annual education statistics 2024. Royal Government of Bhutan, 2024. <https://education.gov.bt/download/annual-education-statistics-2024/>
18. Ministry of Education and Skills Development, Bhutan. Department of Education and Policy annual report 2024–2025. Royal Government of Bhutan, 2025. <https://education.gov.bt/download/dep-annual-report-2024-2025/>
19. Ministry of Education, Government of India. All India Survey on Higher Education 2021–22: Final report. Ministry of Education, 2024. <https://aishe.gov.in/document/aishe-final-report-2021-22/>
20. Ministry of Education, Government of India. All India Survey on Higher Education: Final reports. Ministry of Education, 2026. <https://aishe.gov.in/aishe-final-report/>
21. Ministry of Minority Affairs, Government of India. Pradhan Mantri Jan Vikas Karyakram: About the ministry and project types. Ministry of Minority Affairs 2026. <https://pmjvk.minorityaffairs.gov.in/home/page/about-the-ministry>
22. Ministry of Minority Affairs, Government of India. PM VIKAS: Budget. Ministry of Minority Affairs. <https://pmvikas.minorityaffairs.gov.in/page/budget>
23. Naseem MA. Education of minorities in India: An inclusive approach. *Journal of Educational Planning and Administration*,2011;25(4):373–386.
24. National Commission for Religious and Linguistic Minorities. Report of the National Commission for Religious and Linguistic Minorities. Ministry of Minority Affairs, Government of India, 2007.
25. Office of the Registrar General & Census Commissioner, India. C-09: Educational level by religious community and sex for population age 7 and above, 2011. *Census of India*, 2011. <https://censusindia.gov.in/nada/index.php/catalog/2493>
26. Pieters J. Education and household inequality change: A decomposition analysis for India. *The Journal of Development Studies*,2011;47(12):1909–1924. <https://doi.org/10.1080/00220388.2011.561323>
27. Prime Minister's High-Level Committee. Social, economic and educational status of the Muslim community of India: A report. Cabinet Secretariat, Government of India, 2006.
28. Reddy KV. Minority educational institutions. In: Choudhry S, Khosla S, Mehta P, eds. *The Oxford handbook of the Indian Constitution*. Oxford University Press, 2017, 921–942. <https://doi.org/10.1093/law/9780198704898.003.0051>
29. Schuelka MJ. Inclusive education in Bhutan: A small state with alternative priorities. *Current Issues in Comparative Education*,2012;15(1):145–156. <https://doi.org/10.52214/cice.v15i1.11470>
30. Subba TB. Politics of culture and education in Bhutan. In: Bhattacharya RB, ed. *Cultural heritage and education: Comparative perspectives from South Asia*. Routledge, 2014, 115–131.
31. Tilak JBG. How inclusive is higher education in India? *Social Change*,2015;45(2):185–223. <https://doi.org/10.1177/0049085715574178>
32. UNESCO. Global education monitoring report 2020: Inclusion and education—All means all. UNESCO, 2020. <https://www.unesco.org/gem-report/en/publication/2020-inclusion-and-education-all-means-all>
33. Varughese AR, Bairagya I. Group-based educational inequalities in India: Have major education policy interventions been effective? *International Journal of Educational Development*,2020;73:102159. <https://doi.org/10.1016/j.ijedudev.2020.102159>
34. Wangyal T. Ensuring social sustainability: Can Bhutan's education system ensure intergenerational transmission of values? *Journal of Bhutan Studies*,2001;3:106–131.
35. World Bank. Bhutan human capital data. World Bank, 2026. <https://humancapital.worldbank.org/en/economy/BTN>
36. World Bank. School enrollment, secondary (% gross). World Bank Gender Data Portal, 2026. <https://genderdata.worldbank.org/en/indicator/se-sec-enrr>