



RIGHT TO EDUCATION OF A PREGNANT STUDENT

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ABSTRACT- Indian legal system is still weak as it is not fully developed to cover all issues related to people and society but we, the Indians, still have a faith in our legal system. From years to years and from time to time, several amendments have been made and new laws have been enacted and even the new ones are being enacted, not only for settling present problems but also for settling the upcoming issues in future. Legislature of any nation enacts laws mostly on social needs and it is also true that till date social needs are not exhaustive. Many issues related to social needs are still left untouched by the law makers and right to education of a pregnant woman is one of them.

The authors through this paper want to draw attention towards this problem, which the women throughout the world are still facing and remarkable thing is that not a single law is to protect them for this problem.

The author in this paper has tried to point out the problems faced by the pregnant student, its solutions, and the response of legislature and judiciary in this regard in Indian reference.

KEY WORDS: Student, Pregnant, Education, Right & Disability

I. INTRODUCTION: RIGHT OF EDUCATION OF A PREGNANT WOMAN

Marriage for man & woman is essentials almost in all societies and it has to be done, for family, religious and social causes. In Hindus, there are four types of *Rin* (obligations/debts) that a person acquires and must repay in his lifetime. *Brahama-Rin* (God's Debt), *Dev-Rin* (Debt towards the Deities), *Guru/Rishi-Rin* (Obligations towards Teachers/Sages) and *Pitra-Rin* (Parental Debt). There are many ways to repay these debts but for the repayment of *Pitra-Rin* (Parental Debt) a person not only has to serve his parents in old ages but also has to procreate children by getting married. Even in Muslims, marriage is an *Ibadaat* (devotional act) and a person has to do marriage for procreation of children.

In both of the above mentioned cases due to social, family and religious needs, a woman has to marry and procreate children but what she gets in return? By giving birth to children, she contributes in family, social and nation building but in return she loses her frolic, ambition, dreams, sleep, beauty, figure and many more. In this list one more important thing is required to be added i.e. **her studies, especially during pregnancy**. Should there be a 'Right of education of a pregnant woman'? This is the untouched issue and through this paper the authors are trying to draw attention of the Law making institutions on this right, i.e. 'Right of education of a pregnant woman'.

The three organs of government i.e. Legislature, Executive, Judiciary are continuously working for empowerment of women. Apart from this, these organs are working on maintaining equality among men and women in all sphere of life. To bring female on equal footing, many privileges, relaxations, reservations have been given to the half world, i.e. woman. In present decade women, whether married or unmarried, are blessed with so many legal facilities like free education to girls, dowry prohibition law, reservation system, maternity benefits, etc. and even these institutions are working well but when the same female got pregnant, she loose many things and one of them is education. She either has to quit it in midway or have to face the intolerable problems just for the sake of studies.

II. WOMAN'S RIGHT OF REPRODUCTION

A woman has a right of reproduction. Her reproductive rights are legal rights and she has freedoms relating to reproduction and reproductive health.

PROVISIONS UNDER INDIAN LAWS

Woman's right of reproduction is covered under article 21 of Indian Constitution which says:

"No person shall be deprived of his life or personal liberty except according to a procedure established by law."

In this context, it is clear that a woman has personal liberty to conceive during her studies and she should not be deprived from studies while exercising her right to reproduction. In this reference article 42 becomes relevant. It says:

"The State shall make provision for securing just and humane conditions of work and for maternity relief."

Therefore state shall make provisions for the pregnant students' relief and it should include relief in attendances from the classes or to make some alternative arrangements during pregnancy.

PROVISIONS UNDER INTERNATIONAL LAWS

Reproductive rights are defined as: "Reproductive rights rest on the recognition of the basic right of all couples and individuals to decide freely and responsibly the number, spacing and timing of their children and to have information to do so, and right to attain the highest standard of sexual and reproductive health. They also include the right of all to make decisions concerning reproduction free of discrimination, coercion and violence."

Women's reproduction rights can be interpreted for including her right to education. This fact can be observed in the following documents of International Laws.

International covenant on economic social and cultural rights 1966

Under international covenant on economic social and cultural rights, 1966; says that "special protection should be accordance to mothers during a reasonable period before and after childbirth."

Convention on the Elimination of All Forms of Discrimination Against Women 1981

Under CEDAW convention, Article 10(f) says that "Elimination of all forms of Discrimination against women to reduce the rate of female student drop-out;

States Parties shall take all appropriate measures for "the reduction of female student drop-out rates and the organization of programs for girls and women who have left school prematurely."

Protocol to African Charter on Human and People's Right on the Rights of Women in Africa 2005

Its provisions say:

States Parties shall take specific positive action to: promote the enrolment and retention of girls in schools and other training institutions and the organization of programs for women who leave school prematurely.

Article 14 prescribes:

1. "States Parties shall ensure that the right to health of women, including sexual and reproductive health, is respected and promoted. This includes:

- a. the right to control their fertility;
- b. the right to decide whether to have children, the number of children and the spacing of children;
- c. the right to choose any method of contraception;
- d. the right to self-protection and to be protected against sexually transmitted infections, including HIV/AIDS;

e. the right to be informed on one's health status and on the health status of one's partner, particularly if affected with sexually transmitted infections, including HIV/AIDS, in accordance with internationally recognised standards and best practices;

f. the right to have family planning education.

2. States Parties shall take all appropriate measures to:

a. provide adequate, affordable and accessible health services, including information, education and communication programs to women especially those in rural areas;

b. establish and strengthen existing pre-natal, delivery and post-natal health and nutritional services for women during pregnancy and while they are breast-feeding."

Further it says that "The State Parties undertake to 'ensure the right of pregnant or nursing women or women in detention by providing them with an environment which is suitable to their condition and the right to be treated with dignity'".

III. THE AFRICAN YOUTH CHARTER 2006

African Youth Charter provides "The state shall ensure where applicable, that girls and Young Women, who become pregnant or married before completing their education, shall have the opportunity to continue their education;"

Further this charter prescribes, "The aged and the disabled shall also have the right to special measures of protection in keeping with their physical or moral needs."

IV. US PREGNANCY DISCRIMINATION ACT (PDA), TITLE 7 OF CIVIL RIGHTS ACT OF 1964

PDA was enacted in 1978 and it amended title 7 of the Civil Right Act of 1964 to make clear that the prohibition on sex discrimination in employment includes discrimination on the basis of pregnancy, childbirth and related medical conditions"

It also clears that pregnant women are to be treated the same as other employees who are disabled. The employer's policies for taking leave, health benefits during leaves, and reinstatement after leave applies equally to pregnant women and other employees.

Title VII of the Civil Rights Act of 1964 of US prescribes:

"No person shall, on the basis of sex, be denied admission, or be subjected to discrimination in admission, by any recipient to which this subpart applies, except as provided in Ss. 106.16 and 106.17".

Its rules prescribe that "in determining the eligibility for admission, the recipient-

2) Shall not discriminate against or exclude any person on the basis of pregnancy, childbirth, termination of pregnancy, or recovery therefrom, or establish or follow any rule or practice which so discriminates or excludes;

(3) Shall treat disabilities related to pregnancy, childbirth, termination of pregnancy, or recovery therefrom in the same manner and under the same policies as any other temporary disability or physical condition; and

(4) Shall not make pre-admission inquiry as to the marital status of an applicant for admission, including whether such applicant is "Miss" or "Mrs." A recipient may make pre-admission inquiry as to the sex of an applicant for admission, but only if such inquiry is made equally of such applicants of both sexes and if the results of such inquiry are not used in connection with discrimination prohibited by this part".

On observation of the above provisions, it is quite clear that pregnant student shall be treated specially and additional facilitation shall be given to her to complete her studies.

Still the situation is unfortunate that in spite of these provisions, globally no concrete action has been taken to provide support to these students. In India, every year a lot of students drop studies due to this temporary disability but nobody cares. Only few dares to move to the court but the mixed response of Indian Judiciary has made it unclear.

V. JUDICIAL RESPONSE ON PREGNANT STUDENTS' RIGHT TO EDUCATION

The judicial response seems irresponsive on the issue of the educational right of that person who bears the pain of nine months and gives birth to the 'Future of nations'.

Before discussing Indian cases following two foreign cases are noteworthy

Valerie Coggeran verses South Bank University, London (2000)

In this case Ms. Coggeran was unlawfully excluded from the final year of a university degree course because of pregnancy related illness. Deciding the case in favor of Ms. Coggeran Mr. Justice Munby said that domestic law i.e. Sex Discrimination Act 1975 not only protected women employees from dismissal but also women student from 'exclusion from an educational establishment', if they suffered pregnancy related illness".

Stephanie Stewart Case of City University of New York (2012)

Stephanie Stewart was an honors student at the borough of Manhattan community college on an academic scholarship, was due to deliver her son before the end of spring semester in 2012. Due to pregnancy she had to drop tests and assignments and later on had to pay extra to cover her studies in time. National Women's Law Center took her case, and as a result the CUNY system reimbursed her for the expenses she racked up. Now CUNY has adopted a systemwide policy to address the rights of pregnant students.

Vandana Kandari Versus University of Delhi (2010)

In this case two students were denied permission to appear in examinations as their attendance was short due to their pregnancy. They were later on allowed on the interim order of the court but result was put on hold.

The court finally heard and disposed the case in the favor of those pregnant students by saying that "by not giving these students relaxation, we cannot make them pay the price for the glory that is motherhood," Delhi H.C. issued the guidelines that any pregnant student cannot be prevented from appearing in examination in any semester on the grounds of shortage of attendance in any class. Justice Kailash Gambhir stated "If any women candidate is deprived or detained in any of the semester just on the ground that she could not attend classes being in advanced stage of pregnancy or due to delivery of the child then such an act on the part of the college or university would not only be completely in negation of the conscience of the constitution of India but also of the Constitution of India but also of the women right and gender equality the nation has long been striving for".

Jasmine V.G. vs Kannur University (2016)

In this case the Kerala High Court has ruled that pregnancy is not an unexpected medical condition but a planned one. Choosing to expand family can be deemed to have taken a sabbatical from regular studies. The plea of student, "motherhood is not a crime" was not accepted by the court and remarked that pregnancy is an optional choice and deviation from the academic requirements of attendance of a regular course of study cannot be allowed. It was also added that the insistence to adhere to the course regulations cannot be termed to be a negation of the preferential treatment to women.

Ankita Meena v University of Delhi (2018)

In this case the Supreme Court of India refused to allow a law student of DU to take her examination on grounds of short attendance owing to her pregnancy.

The student could not attend 75% classes due to her advanced stage of pregnancy. The law student was disallowed by the university to appear in the examination due to short attendance. She moved to the court but a single judge bench of high court refused to grant any relaxation in attendance to the student. The court observed that her inability to attend the classes was justified but in the light of the provisions of BCI Rules of Legal Education, no relief can be granted as attendance is mandatory in professional courses. She appealed to the division bench and also moved to the Supreme Court for quick relief as the examination had already commenced. She was refused as she had not applied the legal remedy in time. The court repeated the view that BCI Rules cannot be overlooked.

R. Devika vs The Chairman Tamil Nadu Uniformed Recruitment Board & others (2019)

In this case the petitioner was eight weeks pregnant on the day when the physical efficiency test was conducted. She took 30 seconds extra to complete the running and was rejected. The court held that taking 30 seconds extra running test by a pregnant woman is negligible and she should have been selected. Her participation in a running test itself is a sign of courage, as persons similarly placed would be afraid of a miscarriage. The court observed that child birth should be considered as a contribution to continuity of generations, without which the existence of the world is impossible.

VI. DISCOURAGING FEMALE EDUCATION DURING PREGNANCY

Pregnancy related problem generally take the student to discontinue her education due to the health issues of her own and the unborn. Most of the time, these result in either quitting from studies or lapse of one whole year or the semester. Why this happens? The answer is very simple, this happens because in India no school or university is providing facilities to the student who got married and becomes pregnant during her studies.

Since till date no guidelines have been made or enacted by the government in this regard, educational institutes haven't dreamt about this issue and due to the lack of any law or policy, obstacles are created for pregnant women in her developmental process.

Remarkable thing is that the issue related to non facilitation of educational benefits is not new and since a long time girls and women, on this ground, are continued to be discriminated not only in accessing education but also during continuation of education.

In 2000 in globe, 54% of the 378 million out-of-school children, adolescents and youth were female. Though by 2019, the female share of the global out-of-school population had fallen to less than 50%, its averages are different at regional and national levels.

The gender disparities in education can be seen by this fact that 132 female adolescents are out of school for every 100 male adolescents. Latest data shows that approx 57 million children worldwide including 31 million girls are out of school and 2/3 of illiterate adults are women.

Poverty, child marriage, school based violence, discriminatory gender norms and pregnancy are some of the major obstacles to girl's education (that prevent girls from going to school) worldwide.

VII. CHALLENGES BEFORE PREGNANT STUDENTS

Women affected by pregnancy or related conditions must be treated in the same manner as other applicants or employees who are similar in their ability or inability to work. However no law in India recognizes the need of maternity leave for pregnant students.

Every year, there are several students in the colleges who attend classes with delivery dates. This fear of attendance shortage and losing a year keep them in classes despite the nausea and other difficulties associated with pregnancy and then finally in the exams during which pregnant students have to face a bundle of problems.

Some problems that may be faced are:-

Uncomfortable Seat

During Pregnancy it is tough to sit long and that too on normal chairs. In educational institutes furniture, provided to students remains the normal ones while the pregnant ones need some comfortable chair-table. Therefore, they face acute problems while taking seat in the classrooms as for them it is totally unable to fit them in college desk.

No extra time in Exam's criteria

It is very hard for the pregnant student to sit in a constant position sitting upright for 3 hours without any interval during which they can relax. Since provision of this kind of relaxation is totally missing from the rules of educational institutes and they are forced to face this uncomfortable position or to leave the study or examination. If they choose the first one, not only the life of mother but also of the unborn moves on risk.

Untrained Staff

Generally the college staff members, except in medical college, are not the medical man and are mostly male who remains mostly reluctant in supporting the pregnant student and even pass comments in spite of supporting them or tackling the problems if faced by any pregnant student.

No Separate Room

They have to sit in a common room with other able students which in itself make uncomforness for disable i.e. pregnant student. Sometimes exam room/hall or class rooms are located at a long distance or on upper floors and in India lifts or elevators are the strange things especially in government colleges or institutions. They are forced to reach the room after climbing so many stairs which again become a giant hurdle to pass.

No Medical Facility

Pregnancy is a natural process and every pregnancy is different from other with different kind of problems. Thus, in this situation if an emergency caused then there is no specific medical facilities avail in the exam centre or colleges.

Suffocated Environment / Surroundings

Generally class rooms or exam centers remain over crowd and creates the environment suffocated and this suffocated environment for a pregnant student becomes a big challenge to face as during pregnancy experiencing, suffocation issues are normal and during exams, sitting in between the crowd of normal able

students make the classrooms more suffocated for these pregnant students and even sometimes the rooms are not airy or weather friendly.

VIII. HEALTH HAZARDS ARISES/ FACED DUE TO THE PROBLEMS FACED DURING EXAMINATION

If no facilitation is provided to the pregnant student, following problems may arise and cause threat to the mother and the unborn.

1. Everyday activities, during exam at a non facilitated centre, such as sitting and standing, bending, lifting, climbing stairs, etc will cause pain and discomfort.
2. Sitting in a constant position without moving around for hours can cause muscle tension, no fluid buildup in legs and feet, blood clots and heavy back pain.
3. Backache, tighten pelvic muscle with severe pain can be caused if the common and non-adjustable chair is arranged.
4. For writing answers on a normal desk, bending forward will cause stomach pain and shall be harmful for the fetus to breathe or move properly.
5. Heavy crowd, loud noise and suffocating surrounding can cause shortness of breath, fainting, dizziness, vomiting and nausea which adversely effect on the fetus/embryo.

IX. FACTS & FIGURES OF DROPOUT FEMALE STUDENTS

1. According to Chicago Public School Research Reports of 2001- "Approx 35 students drop-out each year due to pregnancy"
2. According to the report of US National Council of State Legislatures in 2013 "30% of total drop-out, key reason is pregnancy" Only 40 percent of teen mothers finish high school. Young women who give birth while attending a community college are 65 percent less likely to complete their degree than women who do not have children during that time.
3. According to UNICEF report on a seminar on India Human Development in 2011, "The dropout scenario in the country, India is extremely high and among them higher dropout rates are of girls. Out of many reasons, one main reason is pregnancy."
4. In South Africa it has been reported in between 2007 to 2009 that rising school dropout rates was because of pregnancy and one can see very often pregnant girls in schools. News papers headlines of that period can be seen on this issue, - 'Pregnant pupils expelled', 'Maternity leave for SA's pregnant pupils' etc.
5. As per the study of Rutenberg et al. in 2001, 39% dropout was caused due to pregnancy in SA.
6. As per the report of KZN Transitions study of 2006, in SA 74% of girls aged 14-19 years dropped out of school at the time of pregnancy and only 29% returned to school.
7. McQueston & Amanda's study in 2012 shows that pregnancy was correlated with an increased likelihood of dropout of 12% for Africans and 22.3% for Coloreds in South Africa.
8. A study in of Eloundou-Enyegue in 2004 reveled that pregnancy accounted for a third of dropout in Grade 7 (first year of secondary school) in Cameroon.
9. According to National Campaign in 2015 to prevent teen and unplanned pregnancy- campaigning for trying to prevent those pregnancies and keep students enrolled reports that- "61% of students who have a child or pregnant after enrolling in a community college dropout before finishing a degree or credential"
10. According to a survey in 2013 almost 13 000 female students drop out of school every year due to pregnancy in Kenya.

X. INDIAN SCENARIO ON DROPOUT AND ITS CHALLENGES

India doesn't keep accurate track of children who have dropped out. The meaning of dropout in India is different in different states as one Indian state defines a dropout as a student with three months of unexplained absences, but other states say its one month or even seven days. Still in every year on an average, five students in each college lose out a year due to pregnancy.

Following challenges are before us:

1. How can the Indian government set guidelines for intervening when students are in danger of dropping out if they don't have a common definition for a dropout?

2. When the facility of Individual Examination Adjustments (IEA) avail to disabled then why not to pregnant students who are temporary disables?
3. School regulations allow for Individual Examination Adjustments (IEA) to be made if you have a documented medical, physical or mental health condition or a learning disability such as dyslexia or Dyspraxia but not in pregnancy. Why?
4. Many people do not see pregnancy as a condition, but the fact remains that each and every pregnancy is different and comes with challenges.

XI. RECOMMENDATIONS, SUGGESTIONS & CONCLUSION

1. A pregnant student must be considered as temporary disabled and therefore she must be given facility accordingly, including for continuance of her studies.
2. Individual Examination Adjustments (IEA) should be made available to the pregnant students.
3. Maternity Benefit should be made available to the pregnant students in all educational programs and attendance should be calculated on the basis of lectures excluding the lectures taken during the maternity period.
4. Discrimination between pregnant and non-pregnant should be treated as reasonable classification.
5. A uniform code for the educational institutions should be made for regulation of this issue.
6. Teen pregnancy prevention should be incorporated into state efforts to reduce the dropout rate and improve educational attainment.
7. Importance of pregnancy planning should be explained to the married students through orientation, first year experience, academic courses, service learning, or other student-led activities.
8. Online courses, flexible scheduling and other services should be developed to help young mothers for completion of their courses without dropout.
9. During examination the pregnant students must be facilitated with comfortable seats, medical assistance and hygiene.
10. Paid facilitations can be made available to the pregnant students on demand.
11. Motherhood is not a crime and till date no civilized democracy in the history of mankind has ever done or will ever treat it as crime. They must not be made to pay the price for the glory that is 'motherhood'
12. Pregnancy affects women in different ways and must be accommodated in an academic session if the student wants and it is not right to say that pregnancy must be planned and prioritized by a student.

Conclusively it can be said that marriage and motherhood are not crimes. A woman, if willing to continue her studies, must be given support as she bears the pain of nine month (and even more than this) and contributes the nation building in two way. She gives birth to the future of nation and at the same time by completing her studies in time, she can give a good human resource to the country.

It is also noteworthy that pregnancy is a reasonable ground on which relaxation in attendance and special treatment during exams can be given to the mother. The supreme law of India directs that the state must make provisions for securing just and humane conditions of work and for maternity relief. A mother should be given opportunity to meet her education and career goals. It will not be against 'Right to Equality' as discrimination on the basis of sex –including pregnancy is prohibited under Indian Constitution.

In the present era of Information Technology, when education facility has become available on internet, denial of the right to study or to complete studies to the upcoming mothers shall be a pure injustice and will be a clear cut avoidance of Human Rights.

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