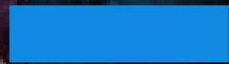


A background image showing a group of students sitting on steps outdoors, studying and using laptops. A basketball is visible in the bottom right corner.

DRAFT GUIDELINES FOR PREVENTION OF MISLEADING ADVERTISEMENTS IN COACHING SECTOR

CONSULTATION FEEDBACK REPORT

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TABLE OF CONTENTS

Introduction and Summary	01
Methodology	02
Outreach Conducted	04
Overall Trends in Responses	06
Insights and Findings: Civis' Platform and Chatbot	07
Online Polls with YouthKiAwaaz	09
Social Media Analysis	10
Responses Received: Civis' Platform and WhatsApp Chatbot	Annexure

INTRODUCTION & SUMMARY

01

The Central Consumer Protection Authority released the Draft Guidelines for Prevention of Misleading Advertisements in Coaching Sector on February 16, 2024, and invited public feedback on it until March 16, 2024.

As an independent non-profit organisation working to support the government in conducting public consultations, Civic Innovation Foundation ['Civis'] worked to gather feedback from a diverse stakeholder group on the Draft Guidelines.

In the given period, 28 respondents directly engaged with the Draft Guidelines, through the Foundation's web platform 'Civis', and its WhatsApp channels. This report captures and analyses all these responses, along with the feedback shared by citizens on the Draft Guidelines over public platforms like social media through posts and online polls.

The draft contains specific responsibilities on its primary stakeholder, i.e. All Coaching centres (at the school, graduate, post-graduate or employment coaching, along with those for specific competitive exams and/or general coaching).

However, its provisions also impact:

- School and College Students
- Competitive exam aspirants
- Teachers at coaching institutions
- Consumer Dispute Redressal Commissions at the District, State and National Level

METHODOLOGY

02

Civis facilitated feedback through its platform civis.vote, where the draft guidelines were simplified for every stakeholder to comprehend and respond to. In addition to the platform, feedback collection was also enabled through a WhatsApp chatbot, developed by the team at Civis.

In order to make the public aware that the draft guidelines were open for their feedback, Civis undertook extensive outreach through multiple channels like social media, popular publications, etc. The outreach conducted for this consultation has been highlighted in detail later in the report.

In addition to our own platform and chatbot, Civis partnered with a youth engagement platform YouthKiAwaaz, or YKA, to enable reaching out to the most relevant impacted stakeholder under these draft guidelines, the youth.

In Partnership with:



Youth Ki Awaaz (YKA) is India's largest platform that uses polling, surveys and storytelling to transform youth voices into actionable insights for social and behavioural transformation. With a community of 160,000 contributors and over 10 million monthly visitors, YKA is at the forefront of youth expression and research and has worked with some of the largest high-impact organisations to drive data-driven decision-making for the youth.

Over the last 16 years, YKA has built India's largest writing platform, run large-scale behaviour change campaigns on issues such as climate change, gender-based discrimination and others with high-impact organisations such as the United Nations. YKA has also won several awards such as the United Nations ITU Innovators award for its community-building efforts, WAN-IFRA for innovation in storytelling and campaigning, as well as Digipub Awards for innovation in media.

YKA facilitated feedback on the consultation through polls on their Twitter account.

Lastly, the Civis team also analysed public discussion on social media about the draft guidelines.

Hence, 3 sets of responses have been analysed through this report:

- Responses received on Civis' platform and chatbot
- Online Polls conducted in partnership with YouthKiAawaz
- Social Media discussion on the Draft Guidelines

WhatsApp chatbot:

Due to its ease of use and access, Civis developed a WhatsApp chatbot to receive responses, and publicised it through our social media and direct communication channels.

The chatbot sought responses on 3 questions, where 2 were multiple choice and 1 was open ended to aid responses relevant to the draft guidelines. The questions were:

- Do you think the above provisions will sufficiently deal with misleading advertisements by coaching centres? (Yes/No)
- Have you personally been impacted by it? (Yes/No)
- Are there any other ways to deal with such misleading advertisements?



To ensure maximum outreach and have the consultation reach the relevant last-mile stakeholder, Civis undertook outreach through multiple diverse channels. To build awareness about the issue of misleading advertisements, Civis created a variety of explainer pieces in different formats.

1. Article:



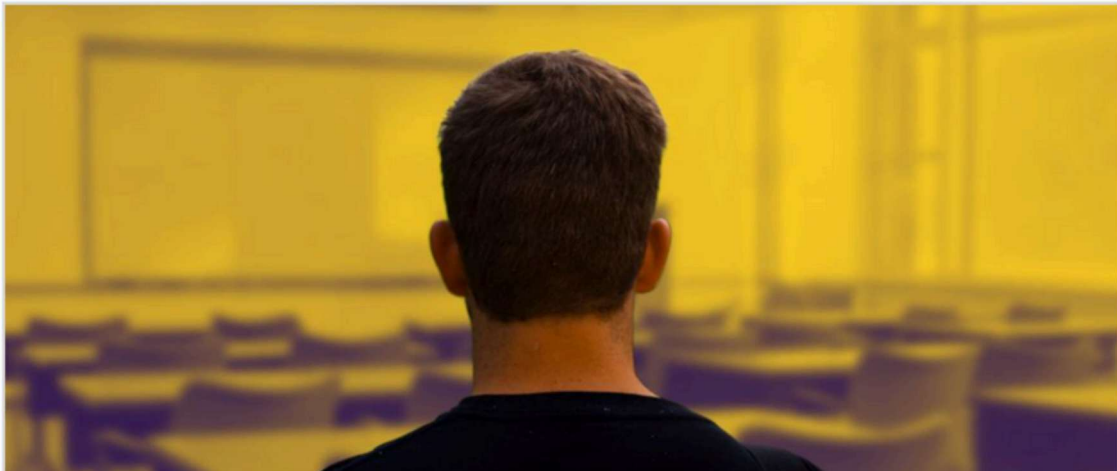
Civis Vote

Mar 11, 2024 • Education, Society

'Guaranteed Admissions', '95%+ Score': How Coaching Classes Mislead Students

484 reads

Views are calculated from the date of publishing and are visible only to the author of the post.



Civis authored an [article](#) on YouthKiAwaaz to engage the youth, given that they are the primary impacted stakeholder of the draft guidelines. Given the relevance of the issue to the audience, ample engagement was received through this method.

2. Audio-visual content:

Additionally, explainer videos, with references to pop culture, were created on the Draft Guidelines to build awareness on the issue, while keeping an average citizen interested in the subject matter.

The videos were circulated on our social media platforms like Youtube and Instagram.



3. Targeted emailers:

To reach the last-mile stakeholder, targeted emailers were sent to specific groups that would be impacted by the Draft Guidelines like:

- Colleges and college students
- Student policy initiatives
- Coaching centres

After these efforts, WhatsApp was seen as the primary mode of feedback collection used by the public.

OVERALL TRENDS IN RESPONSES

06

Across the three modes of feedback collection, Civis analysed a total of 4284 responses.

Mode of Feedback	Number of Responses Analysed
Responses received on Civis' platform and chatbot	28 in-depth responses from Civis users
Social Media discussion on the Draft Guidelines	564 responses sourced across various platforms
Online Polls conducted in partnership with YouthKiAawaz (YKA)	3692 responses on YKA's Twitter Polls

Overall, Civis observed several common trends in the responses analysed including recurring suggestions, opinions on the draft guidelines, and personal experiences across these platforms. Some of these themes/suggestions have been summarised below:

- Majority of respondents had seen these misleading advertisements and have even enrolled themselves in coaching classes on their basis.
- Most respondents find the draft satisfactory in dealing with coaching centre advertisements and feel positively about the proposed guidelines.
- Several respondents highlighted that enforcement of these draft guidelines once implemented, must be ensured through strict measures.
- Multiple unique provisions were also suggested to be included in order to penalise coaching centres engaging in misleading advertising like: withdrawal of operating licences, temporary and permanent bans on advertising, limiting the number and nature of ads permitted, among others.

INSIGHTS AND FINDINGS: CIVIS' PLATFORM AND CHATBOT

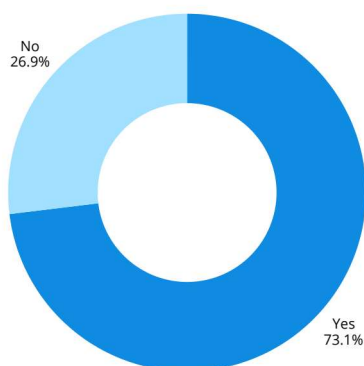
07

Of the 28 detailed responses received on Civis' platform and chatbot, we classified the feedback received into two types, based on the questions answered by the stakeholders:

1. Suggestions/feedback on the draft guidelines
2. Personal experiences of the responder with misleading advertisements

1. **Suggestions/feedback on the draft guidelines**

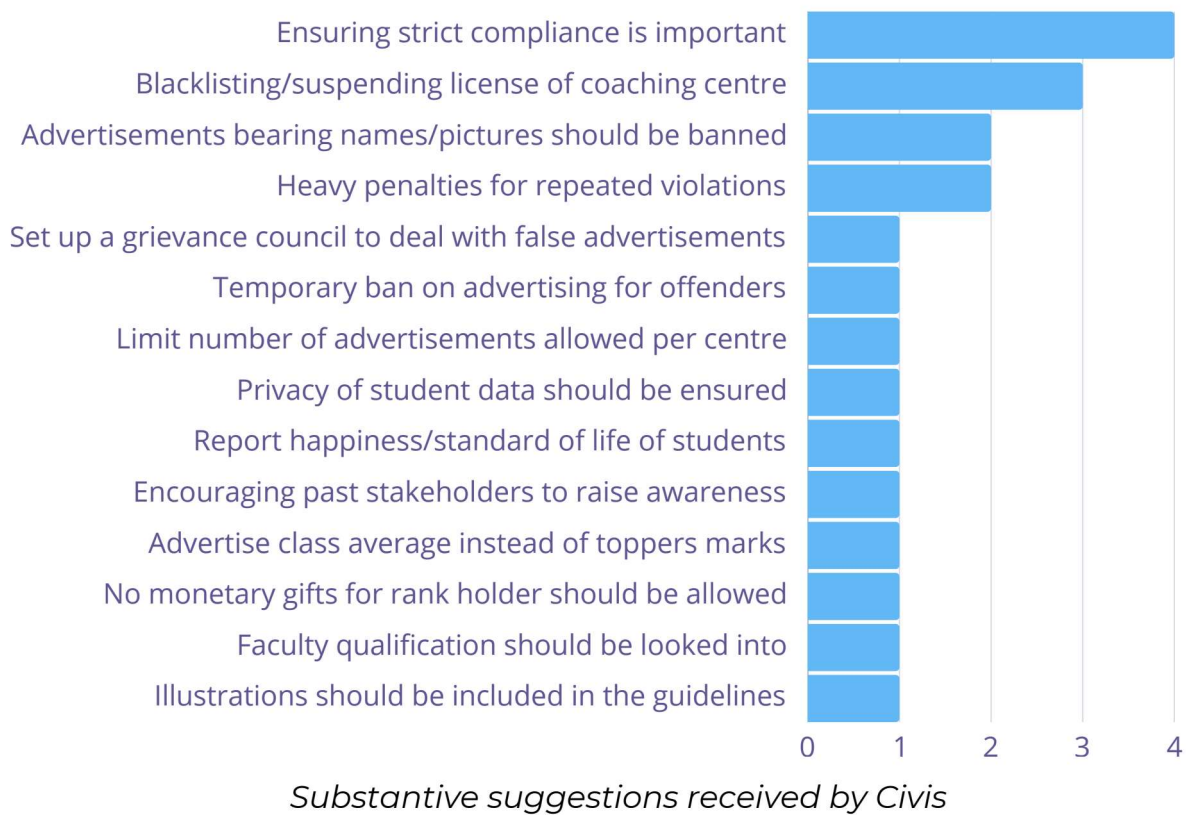
Respondents were asked whether they believe these draft guidelines would be effective in addressing the problem of misleading advertisements by coaching centres. 26 responses were received on this question, and 19 of them believed the draft guidelines would successfully deal with the issue, while 7 did not believe so.



Q. Do you think the above provisions will sufficiently deal with misleading advertisements by coaching centres?

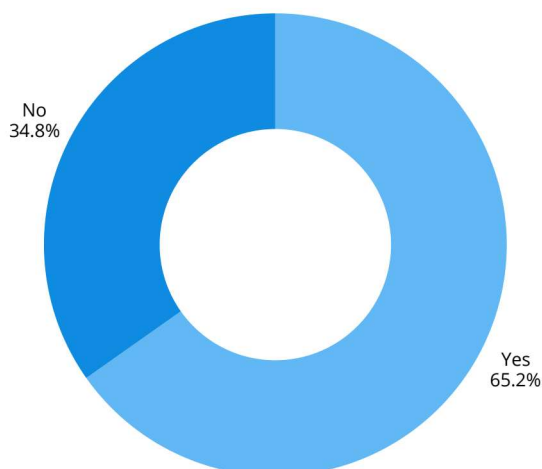
In addition to this, Civis also received substantive suggestions from the respondents, some of which are:

1. Strictly enforcing compliance measures with the proposed guidelines. **(4/28 respondents)**
2. Blacklisting/suspending the licenses of coaching centres that publish misleading advertisements. **(3/28 respondents)**
3. Imposing heavy penalties on repeat offenders. **(2/28 respondents)**
4. Not permitting (i.e. banning) advertisements that promote top performing students, with their names and photos. **(2/28 respondents)**



2. Personal experiences:

On the WhatsApp chatbot, Civis sought feedback on whether respondents had been personally affected by misleading advertisements by coaching centres. This question helps contextualise the status quo in which the draft guidelines are being released and the scale of the problem of misleading ads by coaching centres. The responses reflect that persons have been overwhelmingly impacted by such misleading advertisements.



Q: Have you personally been impacted by such misleading advertisements?

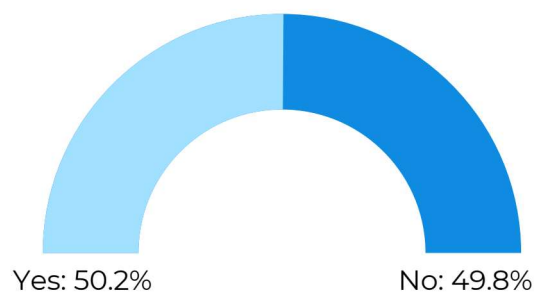
ONLINE POLLS WITH YOUTHKIAWAAZ

09

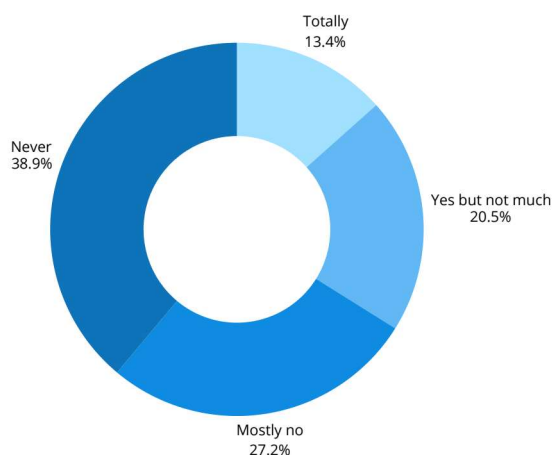
Civis partnered with the youth engagement platform, YouthKiAwaaz to conduct polls on their Twitter related to the draft guidelines. A total of 3 polls were conducted, which received a cumulative of 3692 responses. These polls help gain an insight into citizen's attitudes towards coaching centre advertisements and helped contextualise the problem at hand.

The questions and results are as below:

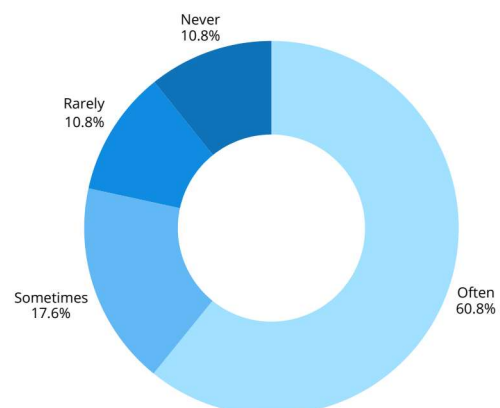
Q. Have you ever made a decision to enrol yourself or your family members in a coaching centre based on the student testimonial and selection percentage given in their ads?



Q. Do you trust the claims made by coaching centres regarding selection, rankings and placements?



Q. How frequently do you come across advertisements by coaching centres in newspapers, internet and in public places?



In the dynamic realm of educational services, the consultation on coaching centre advertisements has sparked significant discourse on social media platforms. Civis aimed to synthesize and scrutinize the extensive array of public discussion from various digital channels. A total of 437 LinkedIn posts and 127 Tweets were collected over the consultation period and analysed.

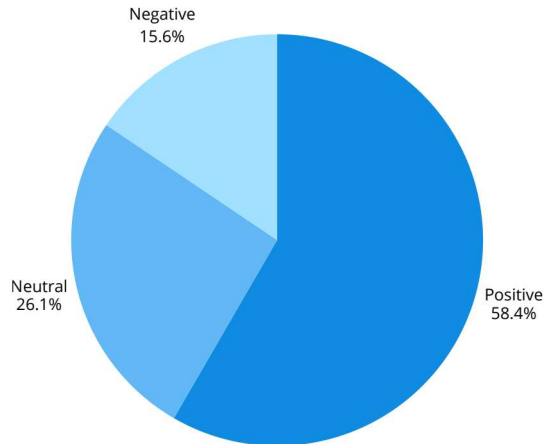
Methodology for social media analysis:

An extensive methodology was employed to source and analyse the feedback on social media. *Advanced data mining* techniques were utilised to gather posts and tweets that contained relevant keywords, to ensure a focused approach. The data was also processed for steps like removing special characters, correcting misspellings, and standardising terminologies.

Then, utilizing Natural Language Processing (NLP) tools, a *sentiment analysis* was conducted to categorize the feedback into positive, neutral, or negative sentiments. This helped in gauging the general public opinion and sentiment towards the proposed regulations.

Lastly, *quantitative and qualitative analysis* was undertaken on the final data to understand the context, suggestions and engagement better.

Quantitative Data:

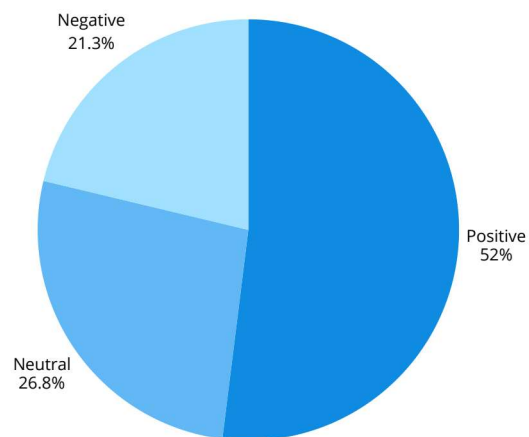


LinkedIn Posts: 437

Positive Sentiments: 255
Neutral Sentiments: 114
Negative Sentiments: 68

Tweets: 127

Positive Sentiments: 66
Neutral Sentiments: 34
Negative Sentiments: 27



Sentiment Analysis:

Based on the LinkedIn and Twitter posts analysed, Civis found an array of sentiments and feedback across the spectrum. This part of the report looks at the depth of opinion under each of the positive, neutral and negative sentiments:

Positive Sentiments:

Many individuals and institutions expressed support for the proposed regulations, citing the need for standardization and quality control in the coaching sector.

Positive feedback often highlighted the potential benefits of the regulations in improving educational outcomes and protecting student interests.

Neutral Sentiments:

- Neutral sentiments generally came from stakeholders seeking more information or clarity about the proposed changes. These posts and tweets neither opposed nor supported the regulations explicitly but called for more detailed discussions or draft proposals.

Negative Sentiments:

- Negative feedback focused on concerns regarding the implementation of the regulations, potential overhead costs, and the fear of stifling innovation and flexibility in coaching methodologies.
- Some stakeholders expressed apprehensions about one-size-fits-all regulations, fearing they might not cater to the unique needs of different coaching centres.

Note on Sentiment Analysis:

It's important to clarify that a "negative sentiment" in our analysis does not necessarily imply direct opposition to the Draft Guidelines. Rather, it often reflects a critical or questioning tone, perhaps signaling areas where stakeholders feel improvements or clarifications are needed. This nuanced understanding of sentiment is crucial in interpreting the public's perspective on complex legislative proposals.



Key Findings and Suggestions from Social Media:

Across social media posts analysed, we found a wide variety of suggestions being made to the proposed guidelines. After finding and grouping common trends, they have been collated below:

Establishment of Regulatory Bodies: Aggregate consumer forums across India to create a unified grievance council. which is empowered to monitor, evaluate, and address false advertisements rigorously, ensuring coaching centers adhere to stringent guidelines.

Enhanced Enforcement Mechanisms: Implement a tiered penalty system starting with fines and escalating to temporary or permanent bans on advertising for habitual defaulters. Propose the blacklisting of coaching centers that repeatedly violate Advertising Standards Council of India (ASCI) guidelines.

Advertisement Regulation: Limit the volume of advertisements a coaching center can publish annually to prevent oversaturation and ensure the quality and authenticity of the information conveyed. Ads should be mandated to include disclaimers or clear indications if a coaching center's claims are based on historical data, ensuring transparency and truthfulness in advertising.

Privacy and Data Protection: Enforce strict guidelines to protect students' data from being exploited for marketing purposes.

Holistic and Ethical Advertising: Encourage coaching centers to portray a realistic view of the academic and personal growth journey, emphasizing the balance between academic success and overall well-being.

Stakeholder Engagement and Feedback: Foster a culture of transparency by encouraging aspirants and their guardians to voice their concerns and experiences in public forums, enhancing the accountability of coaching centers. Implement mechanisms for collecting and analyzing feedback from alumni and current students to provide prospective students and parents with a comprehensive understanding of the coaching center's offerings.

Financial and Legal Accountability: Other than fines, government must Consider suspending or revoking the licenses of coaching centers that commit multiple violations.



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Feedback collated with support from: Antaraa Vasudev, Riddhi Khandhar, Shachi Nelli, Shonottra Kumar, and Srushti Punghera - Civis

