



REFINEMENT OF UNIVERSITY EDUCATION: AN EXECUTIVE AND JUDICIAL APPROACH IN INDIA

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Abstract: *The latest judgment of the Apex Court in P.Suseela&Ors v. University Grants Commission &Ors dealt with the long-standing controversy relating to the basic qualification for the teaching posts in the UGC governed Institutions. The UGC Regulations from 1985 onwards created an exemption from the NET/SLET/SET for the PhD and MPhil degree holders for applying for the teaching job in UGC Institutions. The recent conversation between the Central Government and UGC regarding to the application of UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009 raised the curtain for controversy. The order of the Central Government expressing NET shall be compulsory requirement for appointment in the teaching post in UGC Institutions raised the curtain for the present case-law regarding to the interpretation of the UGC Act, 1956, Regulations 2009, legitimate expectation of the MPhil and PhD degree holders who have been awarded PhDs before 2009 and whoevers PhDs awarded after 2009 are in accordance with the Minimum Standard norms, 2009 of UGC.*

Keywords: *NET, Legitimate Expectations, appointment for Lecturer/assistant professor, UGC Institutions*

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INTRODUCTION:

Hon'ble Supreme Court of India in *P.Suseela&Ors vs. University Grants Commission(UGC)&Ors*, declared that clearing National Eligibility Test (NET)/State Level Eligibility Test (SLET)/SET (State Entrance Test) is compulsory minimum eligibility condition for recruitment and appointment of Lecturers in Universities/Colleges/Institutions governed by UGC (UGC Institutions). The judgment clarified a long standing controversy relating to the minimum qualification for the post of lecturer/assistant professor in any UGC Institutions, by pouring water on the aspirations of the unemployed PhD holders, who obtained their PhD before UGC (Minimum standards and procedure for award of PhD Degree), Regulation 2009 (UGC Regulation 2009). Along-standing debate about laying down NET/SLET/SET as minimum qualification not only raised the debate among public but also between UGC and Central Government. A long exchange of communication between UGC and Central Government shows that UGC is intended to provide an exemption to the PhD holders from NET/SLET/SET (whose degree is in accordance with UGC Regulations, 2009] by adhering to its previous announcements assuring exemptions to the PhD holders from NET/SLET/SET and Central Government is intended to impose NET/SLET/SET as compulsory minimum qualifications for appointment in any UGC Institutions.

The present judgment basically dealt with the following questions:

- *By virtue of Sec. 20(1) of the UGC Act, 1956, whether Central Government is having power to issue directions to UGC regarding to the establishment of NET/SLET/SET as minimum requirement as a policy relating to national purposes by restricting the power of UGC in creating any further exemptions?*
- *Whether the candidates who possess PhD degrees prior to 31.12.2009 before the enforcement of the UGC Regulation,2009 are exempted from the NET/SLET/SET criteria for appointment as lecturer/assistant professor in any UGC Institutions?*
- *Whether the candidates who were awarded PhD degrees prior to 31.12.2009 in accordance with UGC Regulation 2009 are exempted from the NET/SLET/SET criteria for appointment as lecturer/assistant professor in any UGC Institutions?*
- *Whether the candidates who are awarded PhD degrees after 31.12.2009 in accordance with UGC Regulation 2009 are exempt from the NET/SLET/SET criteria for appointment as lecturer/assistant professor in any UGC Institutions?*



Along with the above questions, the Hon'ble court also dealt with the issues relating to 'legitimate expectation', 'vested right', 'Doctrine of retrospective effect' and 'Doctrine of prospective effect' and 'Right to equality'. A critical analysis of the above case is important to understand the stand of the judiciary and executive in protecting and promoting the standards of the higher education. The author being a teacher in a University, attempted to analyze the case in hand to enlighten all the interest parties to the higher education about the present status of the criteria for appointments of lecturers/assistant professors in any UGC Institutions.

UGC ACT, 1956:

UGC has been established according to Sec. 4 of the UGC Act, 1956 enacted by Parliament of India for the co-ordination and determination of standards in Universities under Entry 66 List I, Schedule VII of the Constitution of India. According to Sec.12 of the UGC Act, 1956, *the general duty of the Commission is to take, in consultation with the Universities or other bodies concerned, all such steps as it may think fit for the promotion and co-ordination of University education and for the determination and maintenance of standards of teaching, examination and research in Universities.* According to Sec. 26(e) of the UGC Act, 1956, UGC has been vested with *the power to make regulations by notification in the Official Gazette, make regulations consistent with this Act and the rules made thereunder, defining the qualifications that should ordinarily be required of any person to be appointed to the teaching staff of the University, having regard to the branch of education in which he is expected to give instruction.* According to Sec.20 of the UGC Act, 1956, *in the discharge of its function under this Act, UGC shall be guided by such directions on questions of policy relating to national purposes as may be given to it by the Central Government.*

HISTORICAL DEVELOPMENT OF THE DISPUTE:

In the year 1985, UGC framed regulations regarding '*Minimum Standards of Instructions for the Grant of the First Degree through Non-formal/Distance Education*' prescribing the qualification for the teaching post of Lecturer in colleges. In its report dated March 23, 1985, the National Commission on Teachers II, after observing that standards of performance varied from university to university, expressed the view that it must be ensured that every citizen aspiring to be a teacher at the tertiary level, i.e., a lecturer, qualified in terms of a national yardstick. The Commission recommended that the UGC



should incorporate the passing of one of the national tests at least in grade B+ on a seven point scale in its regulations laying down the minimum qualifications of teachers and that this should come into force within two years. In 1986, the Malhotra Committee appointed by UGC recommended that *there should be certain minimum qualifications laid down for the post of Lecturer*. The Mehrotra Committee recommended the following minimum qualifications for appointment to the post of Lecturer:

- (i) Qualifying at the National Test conducted for the purpose by the UGC or any other agency approved by the UGC.
- (ii) Master's degree with at least fifty-five percent marks or its equivalent grade and good academic record.

The minimum qualifications mentioned above should not be relaxed even for candidates possession M.Phil, Ph.D qualification at the time of recruitment.

Pursuant to the said Committee report, the UGC framed Regulations on 19th September 1991 superseding the 1982 Regulations and providing apart from other qualifications, clearing of the NET as a test for eligibility to become a Lecturer.

Good academic record with at least 55% marks or an equivalent grade at Master's level in the relevant subject from an India University or an equivalent degree from a foreign University.

Candidates besides fulfilling the above qualifications should have cleared the eligibility test for lecturers conducted by UGC, CSIR or similar test accredited by the UGC. By Circular dated February 10, 1993 the UGC granted exemption from appearing in the eligibility test to following categories:

1. All candidates who have passed UGC/CSIR J.R.F. Examination,
2. All candidates who have already been awarded Ph.D degree.
3. All candidates who have already been awarded M.Phil degree upto 31st March, 1991.
4. All candidates who will submit their Ph.D thesis upto 31st December, 1993.

By circular dated June 15, 1993 in respect of candidates falling in category (3) exemption from appearing in the eligibility test was extended to candidates who had been awarded M.Phil degree upto December 31, 1992. By a notification dated June 21, 1995 the 1991 Regulations have been amended and the following proviso has been added below the requirement regarding clearing the eligibility test for appointment on the post of Lecturer:



Provided that candidates who have submitted Ph.D thesis or passed the M.Phil examination by 31st December 1993 are exempted from the eligibility test for lecturers conduct by UGC, CSIR or similar test accredited by the UGC.

The requirement regarding clearing the eligibility test for appointment on the post of Lecturer as prescribed by the UGC under the 1991 Regulations came up for consideration before Supreme Court in *University of Delhi v. Raj Singh and Ors.* observed:

It is very important to note that a duty is cast upon the UGC to take 'all such steps as it may think fit for the determination and maintenance of standards of teaching. These are very wide-ranging powers. Such powers, in our view, would comprehend the power to require those who possess the educational qualifications required for holding the post of lecturer in Universities and colleges to appear for a written test, the passing of which would establish that they possess the minimal proficiency for holding such post. The need for such test is demonstrated by the reports of the commissions and committees of educationists referred to above which take note of the disparities in the standards of education in the various Universities in the country. It is patent that the holder of a postgraduate degree from one University is not necessarily of the same standard as the holder of the same postgraduate degree from another University. That is the rationale of the test prescribed by the said Regulations.

Vide an amendment dated 21st June, 1995, a proviso was added to the 1991 Regulations by which candidates who have submitted their PhD thesis or passed the MPhil examination on or before 31st December, 2002. In the year 2008, Mungekar Committee submitted its final report recommending that NET should be made a compulsory requirement for appointment of Lecturer in addition to the candidate possessing M.Phil or PhD degrees.

UGC VS. SADHANACHAUDHARY:

The Petitioners were awarded M.Phil degree after December 31, 1992. Since they had been awarded the M.Phil degree after December 31, 1992, they were not given exemption from clearing the eligibility test as per the requirement of the advertisement. These appeals raised questions relating to grant of exemption from the provisions contained in the University Grants Commission (Qualifications Required of a Person to be Appointed to the Teaching Staff of a University and Institutions Affiliated to it) Regulations, 1991 (Regulations, 1991) which require that for appointment on the post of lecturer in universities and



colleges, the candidate should have cleared the eligibility test for lecturers conducted by the UGC, Council of Scientific and Industrial Research or similar test accredited by the UGC. The grievance of both the writ petitioners was that for the purpose of giving exemption from eligibility test for candidates who had obtained M.Phil degrees the cut off date i.e., December 31, 1992, has been fixed arbitrarily and that there is no rational basis in confining the exemption to candidates who had been awarded M.Phil degrees upto December 31, 1992 in an advertisement issued in January 1995 because as between December 31, 1992 to December 1994 many candidates might have obtained M.Phil degrees.

The apex court held that, 'prior to the making of the 1991 Regulations there was no statutory requirement regarding clearing the eligibility test for the purpose of appointment on the post of Lecturer. Such a requirement was introduced for the first time by the 1991 Regulations. At the time when the 1991 Regulations were made, the provisions contained in the 1982 Regulations had given rise to a legitimate expectation that a person having a PhD or MPhil degree and having good academic record as prescribed under the 1982 Regulations would be eligible for appointment on the post of Lecturer without anything more. UGC did not intend to deprive the legitimate expectation of the MPhil and PhD degree holders prior to 1991. It was also held that the said requirement in the 1991 Regulations should not operate to the prejudice of persons who, having regard to the qualifications prescribed in the 1982 Regulations, had registered for the PhD degree or had joined study of MPhil degree course prior to making of the 1991 Regulations and, therefore, provision was made for granting exemption to such candidates with the condition that they should have passed MPhil examination or should have submitted PhD thesis by a particular date.

In relation to the cut-off date December 31, 1993 remained unchanged by including those candidates who had joined the MPhil course or registered for PhD degree. Such candidates who have been exempted from the entrance test would constitute a separate class having a reasonable nexus with the object sought to be achieved by the 1991 Regulations.

COMMUNICATION ROW BETWEEN CENTRAL GOVERNMENT AND UGC:

The Department of Higher Education, Ministry of Human Resource Development, Government of India, issued a directive dated 12th November, 2008 according to Sec.22 of the UGC Act, 1956, providing that NET/SLET/SET shall generally be compulsory for all



persons appointed to teaching positions of Lecturer/Assistant Professor in Higher Education and only persons who possess PhD degree after having enrolled/admitted to a UGC notified program from UGC recognized Universities. In pursuance of the said directive, the UGC promulgated the impugned Regulations for 2009, the 3rd Amendment of which provides as follows:

NET/SLET/SET shall remain the minimum eligibility condition for recruitment and appointment of Lecturers in Universities/Colleges/Institutions.

Provided, however, that candidates, who are or have been awarded PhD Degree in compliance of the "UGC (minimum standards and procedure for award of PhD Degree), Regulation, 2009, shall be exempted from the requirement of the minimum eligibility condition of NET/SLET/SET for recruitment and appointment of Assistant Professor or equivalent position in Universities/Colleges/Institutions.

Following the above directive issued by UGC, Ministry issued another directive dated 30th March, 2010 directing the UGC according to Sec.20 of the UGC Act, 1956, that UGC shall not take up specific cases for exemption from the application of the NET Regulations of 2009 once comes in force, for either specific persons or specific university/institution/college from the application of the **UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009** for appointment as Lecturer in Universities/colleges/institutions; and also stated that any grant of specific exemptions from the applicability of NET shall not be implemented as being contrary to national policy.

Pursuant to this directive, UGC framed Regulations of 2010, which states that *NET/SLET/SET shall remain the minimum eligibility condition for recruitment and appointment of Assistant Professors in Universities/Colleges/Institutions. Provided however, that candidates, who have been awarded PhD Degrees in accordance with the UGC (Minimum Standards and Procedure for Award of PhD Degree) Regulations, 2009, shall be exempted from the criteria of NET/SLET/SET for recruitment and appointment of Assistant Professor equivalent positions in Universities/Colleges/Institutions.*

The above conversation row has been understood as the Regulations, having prospective nature, exempts MPhil/PhD holders who have been awarded degrees on or before 10th July, 2009 and 31st December, 2009 and who had registered themselves for the PhD before this



date shall be exempted from the requirement of NET for the purpose of appointment as Lecturer/Assistant Professor.

However, the Central Government letter dated 3rd November 2010 to UGC established their disagreement with the decision of the Commission and emphasized on the compulsory requirement of NET/SLET/SET as minimum qualification for the appointment of Lecturer/Assistant Professor in UGC Institutions.

ARGUMENTS IN THE PRESENT CASE:

The Learned Counsel on behalf of petitioners, assailing the Delhi, Madras and Rajasthan High Court Judgments raised the following issues:

- *That Sec.26(3) of the UGC Act, 1956 entitles a Regulation to be prospective but so as not to prejudicially affect the interests of any person to whom such Regulation may be applicable. The said Regulation imposing NET/SLET/SET exam burden on the candidates is retrospective in nature and also prejudicially affect the interests of the persons to whom 2009 UGC Regulation may be applicable.*
- *That under Sec.26(2), Regulations made in pursuance of Sec.26(1)(e) and (g) do not require the previous approval of the Central Government. Hence, the said Regulations following the dictate of the Central Government are bad and UGC shall be the along qualified body whom the discretion shall be left to decide upon the qualifications of persons to be appointed to the teaching staff.*
- *That the impugned Regulations are violating of Art.14 by creating unequal classification without intelligible differentia where in those who passed their M.Phil and PhD degrees prior to 2009 fell in a separate class.*
- *Strongly relied on UGC vs. SadhanaChowdhary (1996) 10 SCC 536, that the petitioner's legitimate expectation in the matter of appointment on the post of Lecturer had been done away with.*

The Learned Counsel on behalf of Union of India and the UGC stressed raised the following issues:

- *Any Regulation made under Sec. 26 of the UGC Act, 1956 shall be consistent with the Act and Sec.20 is very much part of it. On the questions of policy, UGC Regulations are subordinate to Central Government directions. Central Government's decision is*



final on the question whether a subject matter is a policy relating to national purpose.

- *Strongly relied on Udai Singh Dagar vs. Union of India (2007) 10 SCC 306, that a person will have the right to enter a profession only if he holds the requisite qualification and the holding of such qualification would be prospective if it is a qualification which is laid down any time before his entry into a profession.*

JUDGMENT:

The Hon'ble Supreme Court opined that any regulation made under Section 26 must conform to directions issued by the Central Government under Section 20 of the UGC Act, 1956. An important argument has been raised stating that the previous approval of the Central Government was not necessary for Regulations, which define the qualifications, required of persons to be appointed to the teaching staff of a University, the Government has no role to play in such matters and cannot dictate to the Commission. The court held that Sec. 26 (2) would not stand in the way of the directions issued in the present case by the Central Government to the Commission.

Followed by, the appellants argued that such Regulations should not be given retrospective effect so as to prejudicially affect the interest of any person to whom such Regulation may be applicable. While addressing the issue, the Hon'ble court discussed about the distinction between an existing right and a vested right. The Hon'ble court opined that, '*where a statute operates in future it cannot be said to be retrospective merely because within the sweep of its operation all existing rights are included. A vested right would arise only if any of the Appellants before us had actually been appointed to the post of Lecturer/Assistant Professors and not possessing NET/SLET/SET (as per the Regulations) disqualified their candidature*'. Hon'ble court held that the present Regulations are prospective in nature for the present case, since the appellants are yet to be appointed as Lecturer/Assistant Professor in any University/College/Institution governed by UGC.

The Hon'ble Supreme Court refused to appreciate the arguments of appellants about the violation of Art.14 stating that the object of the directions of the Central Government read with the UGC Regulations of 2009/2010 are to maintain excellence in standards of higher education. Any exemption to NET/SLET/SET will lead to compromise of teaching standards in UGC Institutions, which Central Government is containing.



The Hon'ble Supreme Court while dealing with the doctrine of legitimate expectation, held that the doctrine has no role to play where the State action is as a public policy or in the public interest unless the action taken amount to an abuse of power.

Referring to the case, *University Grants Commission v SadhanaChowdhary (1996) 10 SCC 536*, the court held that the classification made by granting exemptions to PhD holders and MPhil degree holders from NET/SLET/SET had a rational relation to the object sought to be achieved at that point of time, being based on an intelligible differentia. The said judgment will not have any effect to the present case, since a legitimate expectation must always yield to the larger public interest i.e., selection of highly qualified Lecturers/Assistant Professors to teach UGC Institutions.

CONCLUSION:

The present judgment provides clarity about the applicability of the UGC (Minimum standards and procedure for award of PhD Degree), Regulation 2009 and UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009. The conclusions derived out of the analysis of the above case are:

- *By virtue of Sec.20(1) of the UGC Act, 1956, Central Government is having power to issue directions to UGC on question of policy relating to national purposes before or after the issuance of such Regulations by UGC.*
- *UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009 does not require the previous approval of the Central Government since it is not a question of policy relating to national purposes.*
- *UGC as an expert body constituted with specialists in laying down standards and for promotion and coordination of University education has the authority to lay down limited exemptions for teachers in Universities taken after considering the recommendations of the expert committees appointed for that purpose. Central Government does not possess any supervisory powers, to annul the resolutions of UGC.*
- *The PhD holders, who were awarded PhD degrees prior to 31.12.2009, cannot be said to have legitimate expectation maturing into any right to be considered for*



appointment on teaching posts in the University, without obtaining the NET/SLET/SET qualification, unless the UGC has provided for any exemptions. Hence, the PhDs awarded according to UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009, are exempted from NET/SLET/SET and are qualified to be appointed in UGC Institutions.

- UGC (Minimum Qualifications for appointment and career advancement of teachers in Universities and Colleges) 3rd Amendment Regulations, 2009 is prospective in nature i.e., based on the date of appointment as Lecturer/Assistant Professor.
- The PhD holders who have been awarded PhDs before 2009 are eligible for appointment as Lecturer/Assistant Professor in UGC Institutions, if they have been awarded PhD degree with any six conditions out of eleven recommended by the UGC prior to 31.12.2009

The Central Government appointed UGC Review Committee in July 2014, to restructure UGC. The objective of the committee is to provide a mechanism to ensure follow up on regulatory instructions and enforce compliance in relations to setting up of high standards for higher education. The Central Government ensured through future efforts to set up parameters for national ranking of universities to achieving international ranks by Indian Universities. After the pronouncement of the present judgment by the Hon'ble Supreme Court of India, it has been aired by the UGC Review Committee that UGC shall be replaced by the altogether a new statutory agency named 'National Higher Education Authority' through an Act of Parliament enjoying wide ranging and quasi-judicial powers on setting standards in higher education by claiming the present system as failure.

REFERENCES:

Provisions:

Sec. 20 of the UGC Act, 1956: Directions by the Central Government:-

- (1) In the discharge of its functions under this Act, the Commission shall be guided by such directions on questions of policy relating to national purposes as may be given to it by the Central Government



- (2) If any dispute arises between the Central Government and the Commission as to whether a question is or is not a question of policy relating to national purposes, the decision of the Central Government shall be final.

Section 26 of the UGC Act, 1956: Power to make Regulations:-

(1) The Commission may [, by notification in the Official Gazette,] make Regulations consistent with this Act and the rules made thereunder:-

- (a) regulating the meetings of the Commission and the procedure for conducting business thereat;
- (b) regulating the manner in which and the purposes for which persons may be associated with the Commission under Section 9;
- (c) specifying the terms and conditions of service of the employees appointed by the Commission;
- (d) specifying the institutions or class of institutions which may be recognized by the Commission under Clause (f) of Section 2;
- (e) defining the qualifications that should ordinarily be required of any person to be appointed to the teaching staff of the University, having regard to the branch of education in which he is expected to give instruction;
- (f) defining the minimum standards of instructions for the grant of any degree by any University;
- (g) regulating the maintenance of standards and the co-ordination of work or facilities in Universities.
- (h) regulating the establishment of institutions referred to in Clause (ccc) of Section 12 and other matters relating to such institutions;
- (i) specifying the matters in respect of which fees may be charged, and scales of fees in accordance with which fees may be charged, by a college under Sub-section (2) of Section 12-A;
- (j) specifying the manner in which an inquiry may be conducted under Sub-section (4) of Section 12-A.

(2) No Regulation shall be made under Clause (a) or Clause (b) or Clause (c) or Clause (d) [or Clause (h) or Clause (i) or Clause (j)] of Sub-section (1) except with the previous approval of the Central Government.



(3) The power to make Regulations conferred by this section [except Clause (i) and Clause (j) of Sub-section (1)] shall include the power to give retrospective effect from a date not earlier than the date of commencement of this Act, to the Regulations or any of them but no retrospective effect shall be given to any Regulation so as to prejudicially affect the interests of any person to whom such Regulation may be applicable.

Regulations:

UGC regulations regarding “Minimum Standards of Instructions for the Grant of the First Degree through Non-formal/Distance Education, 1985” - Sec. 5(1) of the regulations, *No teachers shall be appointed who does not fulfill the minimum qualification – prescribed for recruitment as per University Grants Commission (Qualification required for a person to be appointed to the teaching staff of a University or other institutions affiliated to it Regulations, 1982 notified under Section 26(1)(e) of the University Grants Commission Act, 1956 – ‘M.Phil degree or a recognized degree beyond Master’s level’.*

Vide Directive dated 12th November, 2008, issued by the Department of Higher Education, Ministry of Human Resource Development, Government of India –*“UGC shall, for serving the national purpose of maintaining standards of higher education, frame appropriate Regulations within a period of thirty days from the date of issue of this order prescribing that qualifying in NET/SLET shall generally be compulsory for all persons appointed to teaching positions of Lecturer/Assistant Professor in Higher Education, and only persons who possess degree of PhD after having been enrolled/admitted to a programme notified by the Commission, after it has satisfied itself on the basis of expert opinion, as to be or have always been in conformity with the procedure of standardization of PhD prescribed by it, and also that the degree of PhD was awarded by a University or Institution Deemed to be University notified by the UGC as having already complied with the procedure prescribed under the Regulations framed by the Commission for the purpose”.*

“UGC (minimum standards and procedure for award of PhD Degree), Regulation, 2009, - Minimum standards – 1. Eligibility criteria for MPhil/PhD Supervisor – The institution shall lay down a specific Eligibility criteria for MPhil/PhD Supervisor, limitation of seats to each supervisor i.e., 8 PhD Scholars and 5 MPhil Scholars, admission of the students shall be through advertisement. 2. Procedure for admission – entrance test followed by interview including discussion on research interest/area, pre-determined number of students only shall



be admitted. 3. Allocation of supervisor – shall be based on area of research, should not be left to the discretion of the student/teacher. 4. Course work – one full semester Pre-PhD course work including research methodology, quantitative methods, computer applications, writing dissertation. 5. Evaluation & Assessment methods – Pre-PhD presentation, submission of draft thesis, publication of at least one research paper in referred journal, evaluation of thesis by two examiners among whom one shall be from outside the state, viva-vocie, 6. Depository with UGC – submission of softcopy of the thesis to UGC within thirty days of the successful completion and award of the PhD.

Case-laws:

University of Delhi v. Raj Singh and Ors. MANU/SC/0069/1995

UGC v. Sadhana Chaudhary (1996) 10 SCC 536

Udai Singh Dagar v. Union of India (2007) 10 SCC 306

Akhilesh Kumar v. UGC 2014 (142) DRJ 68

P.Suseela & Ors etc., etc., v. UGC & The Teachers Recruitment Board & Others etc., etc., 2011(2) CTC 593

Sudipta Kumar Maity v. UGC MANU/WB/0501/2014

P.Suseela & Ors vs. University Grants Commission & Ors 2015(3) SCALE 726

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