



ANALYSIS OF PRIVATE UNIVERSITY LAWS AND RECOMMENDATIONS FOR POLICY FROM SYMBIOSIS

Establishment of Private Universities has been a major milestone in field of higher education in India. Private Universities is a new concept where self financed private universities can be established by private players without financial assistance from the State. A number of private universities have been established in various States as also Central Govt of India has granted Deemed University status to a number of educational institutions. In this era of liberalization and global education, it is germane to attract, encourage and promote the private sector investment in the realm of Higher Education and lay the legislative pathway to establish and incorporate private self-financing Universities in India. It is the right time to develop and implement a progressive framework that provides for opportunities to deserving private institutions and educational promoters, with relevant and sufficient experience and exposure in the field of higher education, so as to contribute towards the expansion of higher education and research.

Symbiosis is a private, un-aided educational institution and has contributed immensely to the higher education sector of India. Symbiosis was founded by the visionary educationist, Padma Shree Dr. S. B. Mujumdar in 1971 as a 'home away from home' for students coming to Pune, India in pursuit of higher education. Symbiosis is today a family of over 36 institutions providing education from Kindergarten to Post Graduation. Symbiosis has over 25,000 students on-campus and over 200,000 students pursuing distance education programs. Ms. Swati Mujumdar, the author of this article, is the Director of Symbiosis Centre for Distance Learning (SCDL) and also Principal Director of Symbiosis Open Education Society (SOES). Her area of research is higher education, distance education and use of ICT in education. She has a keen interest in various policies related to higher education, privatization of education and has presented several papers in national and international conferences.

We at Symbiosis have prepared a detailed analysis report for establishment and incorporation of private universities.

This concept note is an effort to assist you in your endeavour to effectively formulate a broad statutory mechanism to establish and regulate the functioning of private universities in our state considering under the current UGC Regulations.

Before we proceed with this concept note, it is pertinent for us to us to understand the definition of “University” under Sec.2(f) of University Grant Commission Act, 1956 and also to make ourselves aware about the landmark observations made by Hon’ble Supreme Court of India in the famous case of Prof. Yash Pal and Anr. vs State of Chhatisgarh.

University Grant Commission Act, 1956

Section 2f – Definition of “University”

University means a University established or incorporated by or under a Central Act, Provincial Act or a State Act, and includes any such institution as may, in consultation with the University concerned, be recognized by the Commission in accordance with regulations made in this behalf under this Act.

In the light of above mentioned definition, it is important to extract here the observation of the Hon’ble Supreme Court of India *to understand the legislative pathway of establishing and incorporating a Private University in India.*

Supreme Court Judgment 11th Feb, 2005 Prof. Yash Pal and Another Vs. State of Chhatisgarh

It has been observed that a Private University can be established by the concerned State in exercise of its sovereign powers which will necessarily be through a legislative enactment. This means that a Private State University can only be established by a separate Act or by one compendious Act where the legislature specifically provides for establishment of the said University (para 38, 39 of the Judgment).

Further, in Para 40 of the Judgment, the Hon’ble Court dealing with the necessity of the requisite infrastructure before commencement of operations of a Private University observed as follows: –

The word “or” occurring in sentence “established or incorporated” should read as “and”. Therefore, it is suggested that a status of University should be granted only after the entire infrastructure and conditions (academic and others) are met with. Hence most States now issue only an LOI and then create the Act for the said University after inspection and assessment of compliance report.

Also, it is relevant to bring into light the UGC (Establishment and Maintenance of a Private University) Regulations, 2003 & proposed UGC (Establishment and Maintenance of a Private University) Regulations 2010 –

1. Each Private University shall be established by a SEPARATE STATE ACT and shall conform to the relevant provisions of UGC Act 1956 as amended from time to time (Regulations 2003).

2. Each Private University shall be established and incorporated through an Act passed by the Central Parliament or State Legislature concerned for that SPECIFIC UNIVERSITY either as a separate or as a Compendious Act, based on the application to that effect by a sponsoring body (Regulations 2010).

We substantiate our submissions with the following examples:-

- a. **Sharda University** has been established by Act No. 14 of 2009 of UP Government and recognized by UGC (This is a Private University but UP does not have a Private Universities).
- b. **ICFAI University Act 2005** in Meghalaya (enacted in Meghalaya through State Legislation but there is no Meghalaya Pvt. Universities Act).
- c. **Nirma University** established in 2003 is a Private University in Gujarat when the Gujarat Pvt. Universities Act was established in 2009.
- d. **Dhirubhai Ambani Institute of Information & Communication Technology** was established in Gujarat on March 6th, 2003 recognized by UGC under Sec 2f of UGC Act, on 30th Nov, 2004 as a Private University (prior to the Gujarat Private Universities Act was established in 2009).

We have analyzed the following legislations relating to establishment and regulation of Private Universities in the states where such legislations have been enacted.

- a. Rajasthan Private Universities Establishment Guidelines

- b. Haryana Private Universities Act, 2006
- c. Himachal Pradesh Private Universities Establishment Guidelines
- d. Gujarat Private Universities Act, 2009
- e. Assam Private Universities Act, 2007
- f. Punjab Private Universities Policy
- g. UGC Regulations

Before we proceed with the details, we would like to bring following facts to your notice:-

- a. There are 58 Private Universities in India [the list is annexed] which are competent to award degrees as specified by UGC under Section 2f of the UGC Act with the approval of UGC and the statutory councils, wherever required through their main campus. Wherever the approval of the statutory council is not a pre-requisite to start a programme, the Universities are required to maintain the minimum standards regarding academic and physical infrastructure as laid down by the concerned statutory council.
- b. The University is required to follow the regulations and guidelines put forth by UGC for Private Universities (2003, 2010). The standards for quality of programmes and degrees awarded are regulated by UGC. The UGC has in its authority to inspect, recommend improvement and in special cases intervene to disqualify the operations of the Private University through the State Government.
- c. The basic feature of a Private University is that it is unitary in nature and cannot affiliate an institution/college. It can establish off campus centre(s) and off-shore centers subject to certain conditions including number of years of existence with prior approval of State Government and concurrence of UGC. Distance Education courses can be started by the Private University only after the prior approval of the Distance Education Council (DEC) and concurrence of the State Government.

NOW, WE PROCEED TO OUR SPECIFIC RECOMMENDATIONS IN RESPECT OF THE PROPOSED LEGISLATION IN MAHARASHTRA.

It is recommended that the Hon'ble Government of Maharashtra issue a comprehensive "Policy / Guidelines" for Establishment and Incorporation of Private Universities in the State as opposed to creating an "Umbrella Act". The Private University has to be created "BY" an ACT and not "UNDER" an ACT. In

case an umbrella act is passed then the Private University will get created UNDER that Act through a Notification which is against the aforesaid Hon'ble Supreme Court Judgment & UGC Regulations for Private Universities.

Example –

- a. **Chitkara Private University** in Himachal Pradesh was setup UNDER Himachal Pradesh Private Universities Act, 2006. The defect arising out of the said notification in light of the Judgment of Hon'ble Supreme Court of India (mentioned above) has been rectified by passing the Chitkara University (Establishment & Regulation) Act, 2008. Section 45 of this Act specifically mentions that the Himachal Pradesh Private Universities (Establishment & Regulations) Act, 2006 has been repealed. This fact of “repealing” has also been mentioned in Rule No. 18 of the Guidelines of Himachal Pradesh dated 19th November, 2009 bearing No. EDN-A-Ka (3)-1/2008-Loose. Now therefore, these Guidelines govern the Establishment of Private Universities in Himachal Pradesh in place of the repealed Act.
- b. Similar is the case of Rajasthan where a Rajasthan Private Universities Act, 2005 existed however fresh Guidelines were issued on 26th July 2007 suggesting that the former Act was no more in effect (read Rule 16 of the Guidelines).
- c. State of Punjab though had the opportunity to frame an umbrella Act for Private Universities Establishment, declared a “Policy” for Establishment of Private / Self-Financed Universities in Punjab dated 25th June, 2010.
- d. In the State of Uttar Pradesh and Jharkhand there are no umbrella State Acts for establishment of Private Universities. Further there are no Guidelines issued by these States. Nevertheless, Private Universities such Sharda University in UP and ICFAI University in Jharkhand (vide ICFAI Act, 2006) have been created through a specific Act for the respective University which was passed by State Legislature in the absence of either an umbrella Act or Guidelines.

RECOMMENDATIONS FOR DRAFT POLICY / GUIDELINES FOR STATE GOVERNMENT

A. Sponsoring Body

- a) Nature of Sponsoring Body

Generally, under the laws of India, education is one of the charitable objects and hence it can only be conducted by a society or a trust or a section 25c company only. Reference may kindly be drawn to UGC regulations of 2003 which permits all these three types of entities to establish a Private University. Similar provisions are also found in the relevant guidelines of other state. However, a perusal of proposed UGC regulation of 2010 suggests that UGC has omitted sec 25c companies from the list of sponsoring body. Hence, it will be difficult to allow sec 25c companies in the sponsoring body for a Private University. Under the proposed act of Maharashtra, it is seen that a co-operative society has also been included in the list of sponsoring bodies. We recommend that a sponsoring body should be a registered society or registered trust. We recommend that a sponsoring body registered outside of the State may also be allowed to establish a Private University in the State.

b) Term of Existence

We are talking in terms of establishing a University, and hence it is but advisable that higher education being a domain of Central Government specifically in terms of maintaining the standards , therefore it is necessary that either the applicant or the promoters of the applicant should have reasonable experience in the field of education.

B. Characteristics of the Proposed Private University

It is required that a clear distinction should be drawn between a State University and a Private University. As known a State University is necessarily substantially and adequately funded by the Govt, has the authority to affiliate institutions. Per contra a Private University therefore should be unitary in nature and self financed. However, the role and objective of the entire educational establishment being the same therefore, there should not be any restriction in the modes of education that can be pursued by a Private University and hence it should necessarily include all modes such as Conventional / Distance / Open / Vocational / Online etc.

It will be an acceptable deviation if the new age popular technology of online and broadcasting are also included in the modes of education because of its ability to provide far access and reach

In this age of specialization and super-specialization, a Private University may be allowed to offer a range of domains right from a single domain/specialization University to a multi domain, multi specialization and multi disciplinary University.

This may lead to be more innovative and encouraging domain specific growth in education. Depending on the above classification, these Universities may be given distinct advantages in various aspects including land, endowment fund, and other compliances.

It is to be necessarily understood that a University will be created by a state legislature and hence the jurisdiction of the university cannot go beyond that particular state. However, the UGC regulations 2003/2010 provide for setting up of off-campus centres outside the State and off-shore campus subject to certain pre-requisites. Therefore, the proposed policy should provide for an expansion within the state, outside the state and outside India, only in terms of UGC regulations and not otherwise. Having said that, to provide greater reach and to save expenditure of the aspirants a Private University should be allowed to have information and counseling centres beyond the boundaries of the State jurisdiction. However, in respect of study centres which are only concerned with distance education, it be allowed as per the terms and conditions laid down by UGC. A sponsoring body should be allowed to have constituent institutions under the private universities in confirmation with the regulations of the UGC.

C. Guidelines for Proposal

Since, it is a Private University which does not involve any State initiative it necessarily means that the process for its establishment and incorporation can be initiated only on proposal by an applicant.

The proposed recommendations should provide for a nominal application fee and a format in which the proposal is to be submitted. Keeping in view that this may be the first opportunity in Maharashtra providing for establishment and incorporation of a Private University, the fees should be reasonable. In case of Punjab it is Rs One lakh.

The guidelines for the proposal should also provide the nature of information to be sought from the sponsoring body which can be discussed and deliberated.

The sponsoring body should be asked to either submit the proof of ownership of land or plans for land procurement and infrastructural development for the proposed University. This should be part of the proposal.

The policy must include the guidelines regarding source of funding. Establishment and incorporation of Private University will certainly involve huge capital investment and with a view to invite and retain bonafide players, it will be certainly advisable that disclosures regarding the source of funding from sponsoring body are obtained. It may also happen in certain cases that true academicians or genuinely interested persons without sufficient source of funding may be desirous to apply for a Private University.

Considering the merit of such noble intentions and bonafides of interested applicants, the guidelines must provide for an enabling provision to allow a genuine investor with similar objectives to support their endeavours.

The policy should incorporate guidelines on the following:-

- a) Land Requirement
- b) Required Constructed Area
- c) Manpower & Other Infrastructure Requirement
- d) Proof of Funding (Source of Funding), Provision for external Investors
- e) Five Year Plan of Development
- f) Details of Programs and Fees, Potential for Proposed Programs
- g) Facilities

D. Evaluation of Proposal (Application)

The State may constitute an appropriate inspection committee consisting of senior Government officials and renowned academicians.

- a) Constitution of Inspection Committee
- b) Terms for Reference for Committee – financial soundness, expertise, potential of academic programs. The guidelines should also provide the facility for rectifying proposal deficiency by the applicant within a month.
- c) Time Period to give decision on Proposal : 1-3 months

- d) Submission of Report: The report should be submitted as a recommendation by the committee to the Principal Secretary, Higher Education, within one to two months of the first meeting of the committee.

E. Procedure after Report of Inspection Committee

- a) Issuance of LOI: After receiving the report of inspection committee, the Government must issue an LOI within 15 days to a month. The LOI should be a document enabling the sponsoring body to undertake all the necessary activities to establish a Private University including purchase of land.
- b) An essentiality certificate must be issued to the sponsoring body in order to procure required land for the said purpose.
- c) Competent Authority to issue LOI- Principal Secretary, Higher Education

F. Conditions contained in LOI

The Letter of Intent (LOI) must be issued by the Government after submission of satisfactory initial report by the Inspection Committee. The letter should further cover the following conditions:-

- a. Endowment Fund: (Mode of Investment, Utility, Location specific criteria, domain wise)
- b. General Fund
- c. Land Requirement: An essentiality certificate must be issued to the sponsoring body in order to procure required land for the establishment of University campus.
- d. Requirement of Constructed Area (domain wise)
- e. Requirements for Manpower
- f. Requirements for Academic Infrastructure (Books, Journals, Computers)
- g. Reservation Policy (students, staff)

- h. Undertakings & Affidavits: All types of undertakings and affidavits as per requirement of the State Government and the UGC regulations and other pertinent statutory councils may be taken from the applicant.
- i. Compliance Timeline: 1-3 years
- j. Special Conditions (if sponsoring body is less than 3 yrs)
- k. Dissolution of University

Even after an LOI is issued there should be a procedure for Amendment of Proposal - Guidelines should provide for a clear procedure within a specific timeline for the applicant to comply with deficiencies and amend the proposal as required. The amended part of the proposal will be required to be reviewed again and approval be given thereafter.

G. Compliance

The applicant after receiving the LOI will be required to comply with all conditions within 1-3 years. The applicant must be asked to submit a Compliance Report within this timeline. The Inspection Committee will once again require to evaluate this Compliance Report and submit their recommendations to the Government in that regard. The recommendations should be given within 1 month of the evaluation of the Compliance Report. The Inspection Committee will be required to follow certain terms of reference given by the State Government. The applicant may be given a reasonable extension of timeline for submission of compliance of report or rectification of any deficiencies. The proposed University must meet and fulfill all the minimum requirements / criteria laid down by various statutory bodies for respective academic programs. The University will require to seek approval from these statutory bodies.

H. Enactment of University

After receiving a satisfactory compliance report of the sponsoring body and recommendations of the Inspection Committee, the State Government will be required to table a separate Act for the specific University before the State Legislature for its approval. The State Legislature will then pass a separate Act for the establishment and incorporation of the particular Private

University, thereby enabling the Government to issue a Gazette Notification. The said notification will be sent to UGC and MHRD for information. The Sponsoring Body will be further required to make an application to UGC to enlist the newly incorporated University in the UGC List of Authorized Universities. Within a specific period of 3-5 years the University will be required to get itself assessed by NAAC.

The following areas need to be addressed in the Act -

- a. Commencement
- b. Definition
- c. Establishment of the University
- d. Conditions for Establishment of the University
- e. Objects of the University
- f. Powers of the University (Governance)
- g. Admissions and Standards
- h. Reservations Policy - A reservation policy has been put into place by some States. Eg. Himachal Pradesh recommends 25% of student admissions for natives (bonafide residents) and 80% natives in Class III and IV.
- i. Officers of the University
- j. Authorities of the University
- k. Powers to make Statutes
- l. Powers to make ordinances
- m. Annual Report
- n. Annual Account
- o. Conditions for service of employees
- p. Dispute Resolution
- q. Constitution of Committees
- r. Appointment Policies
- s. Funds- Endowment, General, Maintenance
- t. Program Fees
- u. Various Powers of State Government
- v. Dissolution of University - Some States prohibit a University from being dissolved until a certain period of time has passed by.
- w. De-recognition of University - In the event that UGC regulations are grossly violated the said University can be de-recognized via a procedure of de-listing from the approved UGC list of Universities. Further the State

Criteria/States	Himachal Pradesh	Rajasthan	Haryana	Gujarat	Assam	Punjab
application for Private University	Report with documents (20 copies)	Report with documents (1 copy)	Report with documents (1 copy)	Report with documents (1 copy)	Report with documents (10 copies) * sufficient proof of land ownership & bldg plan	with documents (11 copies) * sufficient proof of land ownership & bldg plan
Procedure after application and subsequent compliances	Inspection LOI, Compliance Rpt.2 yrs	Inspection LOI, Compliance Rpt.1 yr	Inspection LOI, Compliance Rpt.1 yr	Inspection LOI, Compliance Rpt.	Inspection LOI, Compliance Rpt.	Inspection, LOI, Compliance Rpt.2 yrs
Authorities of the University & Committees, Constitution etc	Same across each state	Same across each state	Same across each state	Same across each state	Same across each state	Same across each state
Composition of the governing body & Powers	Same across each state	Same across each state	Chancellor, Vice Chancellor, Sec, HE is member of Gov Body	President & Provost, Sec, HE is member of Gov Body	Nothing mentioned	Same across each state
Requirements for compliance of UGC	Requirement to follow UGC Regulatory Guidelines.	Requirement to follow UGC Regulatory Guidelines	Requirement to follow UGC Regulatory Guidelines	Requirement to follow UGC Regulatory Guidelines	Requirement to follow UGC Regulatory Guidelines	Requirement to follow UGC Regulatory Guidelines
Role of Sponsoring Body and 3 rd Party Investors for Private University	Apart from sponsoring body a 3 rd party investor is allowed to contribute funds	Sponsoring Body + others donors can contribute to Univ.	Sponsoring Body + others donors can contribute to Univ.	Sponsoring Body + others donors can contribute to Univ.	Sponsoring Body + others donors can contribute to Univ.	Sponsoring Body + others donors can contribute to Univ.
Reservations Policies (for students & employees of University)	25% of natives in students & 80% natives in Class III, IV in staff	No reservation mentioned	25% of natives (out of that 10% SCST, 5% get full fee exemp.n, 10% get 50% fee exempn, 10% get 25% fee exempn) in	No reservation mentioned	No reservation mentioned	No reservation mentioned

Criteria/States	Himachal Pradesh	Rajasthan	Haryana	Gujarat	Assam	Punjab
			students. No res. in staff.			
Funding Requirements & Policies	Endowment Fund 5 cr. Tribal area - 1 cr.	15km away from municipal limits of Div.HQ / 10km away from municipal limits of other cities 1 cr Tribal area - 75 lakhs, Other areas 2 cr.	Endowment Fund 3 cr + General Fund (not specified)	Endowment fund amt - not specified	Endowment fund amt - not specified	Endowment Fund 5 cr. General domain, & Multi domain - 3 cr. Also General Fund 1 cr
Separate Regulatory Body at State Level	Bill submitted for Regulatory Commission	None	None	None	None	None
Dissolution of Private University & Consequences of Violation of Policies	Dissolution - 25 yrs	None	None	Dissolution - 6 mths notice provided last batch of students has passed out	None	None
Infrastructure, Manpower	Journals, Books - 10 lacs, Equipment & Infrastructure - 1 cr. Appoint relevant staff	Books, Journals - 10 lacs, Within 3 yrs investment guarantee - 50 lacs. Equipment & Infrastructure - 20 lacs & within 5 yrs - 1 cr & Appoint relevant staff	Books, Journals - 10 lacs, Within 3 yrs investment guarantee - 50 lacs. Equipment & Infrastructure - 20 lacs & within 5 yrs - 1 cr &	No specification	No specification	No specification
Procedure to be followed by State Government	State Govt. has to pass a separate Act of legislation for each specific applicant University	State Govt. has to pass a separate Act of legislation for each specific applicant University	State Govt. has to pass a separate Act of legislation for each specific applicant University	State Govt. has to pass a separate Act of legislation for each specific applicant University	State Govt. has to pass a separate Act of legislation for each specific applicant	State Govt. has to pass a separate Act of legislation for each specific applicant University

Criteria/States	Himachal Pradesh	Rajasthan	Haryana	Gujarat	Assam	Punjab
					University	

COMPILATION OF THE LIST OF PRIVATE STATE UNIVERSITIES IN INDIA

Orissa:-

- (i) Vedanta University
- (ii) Sri Sri University

Chhatisgarh:

- (i) CV Raman in Bilaspur and
- (ii) MATS in Raipur

Gujarat:

- (i) DAIICT Gandhinagar
- (ii) Ganpat, Mehsana
- (iii) Kadi Sarva, Gandhinagar
- (iv) Nirma, Ahmedabad
- (v) Pandit Deendayal Petroleum U, Gandhinagar

Himachal Pradesh:

- (i) Chitkara University, Solan
- (ii) Jaypee, Solan.
- (iii) Indus International University, Una
- (iv) Shoolini University of Biotechnology and Management Science 2009, Bajhol, Solan
- (v) Manav Bharti University, Solan, 2009
- (vi) Arni University, Kangra, 2009
- (vii) Eternal university, Baru Sahib, Sirmour

Jharkhand:

- (i) ICFAI University

Karnataka:

- (i) Ajim Premji University, act passed on March 12, 2010.

Madhya Pradesh:

(i) JP University of Engineering and Technology, Guna (Gazette Notification on April 29th 2010.)

Meghalaya:

(i) Martin Luther Christian
(ii) Techno Global.

Mizoram:

(i) ICFAI

Nagaland:

(i) Global Open

Punjab:

(i) Lovely Professional U.

Rajasthan:

(i) Bhagwant University, Ajmer
(ii) Jagannath University, Jaipur
(iii) Jaipur National University, Jaipur.
(iv) Jyoti Vidyapeeth Women's University, Jaipur.
(v) Mewar University, Chittorgarh.
(vi) NIMS University, Jaipur.
(vii) Sir Padmapat Singhanian University, Jhunjhunu.
(viii) Singhanian University, Jhunjhunu.
(ix) Suresh Gyan Vihar University, Jaipur.
(x) Jodhpur National University, Jodhpur
(xi) Amity University, Jaipur
(xii) Sridhar University, Pilani
(xiii) J K Lakshmi Pat University, Jaipur
(xiv) NIIT University, Neemrana, Alwar
(xv) Jagdish Prasad Jhabarmal Tibrewal University, Jhunjhunu

Sikkim:

(i) Eastern Institute for Integrated Learning in Management University, Jorethang.
(ii) Sikkim- Manipal University of Health, Medical & Technological Sciences, Gangtok.

Tripura:

- (i) ICFAI

UP:

- (i) Amity University, NOIDA
(ii) Integral University, Lucknow.
(iii) Jagadguru Rambhadracharya Handicapped University, Chitrakoot Dham.
(iv) Mangalayatan University, Aligarh
(v) Mohammad Ali Jauhar University, Rampur.
(vi) Sharda University, Gautam Budh Nagar.
(vii) Swami Vivekanand Subharti University, Meerut.
(viii) Teerthanker Mahaveer Univesity, Moradabad.

Uttarakhand:.

- (i) Dev Sanskrit Vishwavidyalaya, Haridwar.
(ii) Doon University, Dehradoon.
(iii) Hingiri Nabh Vishwavidyalaya, Dehradun.
(iv) ICFAI Dehradun
(v) University of Petroleum and Energy Studies, Dehradun.
(vi) University of Patanjali, Haridwar.

West Bengal:

- (i) Dhirubhai Ambani Institute of Information and Communication Technology, Kalyani

State	# private universities in June 2009	# private universities proposals in progress	Total
Andhra Pradesh	0		0
Arunachal Pradesh	0		0
Bihar	0		0
Chhatisgarh	2		2
Gujarat	2		2
Haryana	0		0
Himachal Pradesh	2	5	7

Jharkhand		1	1
Karnataka		1	1
Kerala			0
Madhya Pradesh	1		1
Maharashtra			0
Meghalaya	2		2
Mizoram	1		1
Nagaland	1		1
Orissa		3	3
Pondicherry			0
Punjab	1		1
Rajasthan	11	4	15
Sikkim	2		2
Tamil Nadu			0
Tripura	2		2
Uttarkhand	6		6
Uttar Pradesh	8		8
West Bengal		1	1
Delhi			0

Prepared By:
Symbiosis Open Education Society
1065 Gokhale Cross Road, Model Colony
Pune 411016

Director – Swati Mujumdar
Email – director@scdl.net
Tel: 020-66211188 Fax: 020-66211182

Contributions from:
Adv. Ravi Bhardwaj
Sonali Kadam
Adv. Praneet Kumar