

WEST BENGAL COLLEGE & UNIVERSITY TEACHERS' ASSOCIATION

(REGISTERED UNDER ACT XXI 1960)

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Date: 27th February, 2018

To
Honorable Chairman
University Grants Commission

Sub: Feedback for Draft UGC Regulations 2018

Respected Sir,

With reference to the subject mentioned above, we on behalf of our Association would like to submit some of our observations for necessary inclusions /amendments as per your Public Notice dated 9th February, 2018.

Thanking you,

With regards,

Yours' sincerely,

Srutinath Praharaj

General Secretary, WBCUTA, Mob No- 9433820610

Our (WBCUTA) observation on UGC Regulations, 2018

1. In **Para 1.2** it is mentioned clearly for modification/amendments of the relevant Act/Statute of the concerned Universities within 6 months of adoption of Regulation. Here it should also be mentioned clearly for submission of such amended Statutes to UGC within a stipulated time period. You will be surprised to know that in West Bengal, after the amendment of University Act for all the State Universities in the year 2011-12, no initiative has been taken for amendment of statute of the concerned university till date. At present there is no State run University in West Bengal where Senate/Syndicate or Court/Council has been formed according to the Amended University Act, 2011. As a result, the autonomy and democratic governance of the colleges and universities in West Bengal are at stake. In our opinion, UGC must introduce appropriate mechanism to ensure democratic governance and to protect autonomy of the institution otherwise this type of reluctant attitude of the state government and university authorities cannot be removed.

2. We welcome the instruction mentioned in **Para 2.1**. Our Association (WBCUTA) demands implementation of new pay scale and other service conditions as a composite scheme along with the age of superannuation in accordance with the decisions of the MHRD, Government of India.

3. We support the decision for removal of unjustified API/PBAS system for promotion of teachers. It was irrational and humiliating for College and University teachers.

4. The relief given for pending cases of promotion since 31.12.2008 is welcome. However the options given in **p. 30 (clause vii)** of the draft document need to be amended to include the following:

i) In case of the option **under CAS 2010**, the 'relaxation' in the API requirements is vague as it is not specified. Hence the term 'relaxation' must be replaced by the term 'exemption' from all minimum requirements of API.

ii) The **CAS 2000 scheme** should be extended to all pending cases of promotion since 2009 to mitigate the hardships faced by the affected teachers.

iii) In all pending cases of promotion, the relief should be given to affected teachers from the date of their eligibility in the pre-revised Regulations.

iv) Teachers eligible for promotion after July 11, 2016 must be given a **one-time option of CAS 2000 instead of CAS 2010 (4th Amendment)** so as to avoid disparity and discrimination between different sections of teachers.

v) For pending promotions of teachers as per the new Regulations, there should not be any mandatory requirement of PhD for the promotion to Associate Professor in colleges and universities without giving at least five year time space from the date of implementing new Regulation. This type of academic compulsion cannot be

measured with retrospective effect. Scope of doing Ph D work in colleges should also be considered at length before imposing such compulsion.

5. Provision for promotion to Senior Professor in the Universities and Professor in the colleges as mentioned in this regulation was also included in the earlier regulation. In some of the states including West Bengal, there is no scope for promotion to such Senior Professor and Professor post for college and university teachers.

6. The effort to make PhD a mandatory qualification for recruitment of Assistant Professors is a cause for apprehension. It is a matter of concern that conditions are created in the Regulations by which acquiring a PhD no longer benefits the teacher either at the entry-level or in service. Taking away the incentives of PhD and making it a mandatory requirement for direct recruitment would amount to delaying the entry of teachers to the profession by a few years till the acquisition of higher qualification. Coupled with this, the provision (p. 5, clause 3.9) to not include the period of study leave to be counted for promotion will act as a serious disincentive for teachers to avail leave to pursue serious research. It is ironical that on the one hand, the Draft Regulations make PhD a necessary pre-condition for Career Advancement Scheme to senior positions like Associate Professor and Professor, the same Regulations make it virtually impossible for teachers to acquire PhD while in service. Hence, there must not be any change in the qualification of Assistant Professor for purpose of direct recruitment at colleges and in University Departments.

7. Evidence of published research work should include not only research articles in peer reviewed/UGC list of journals, but also other academic/research work such as chapters in books, translations and edited books.

8. All the clauses in the Draft Regulations 2018 (pp. 32-33) pertaining to PhD as mandatory qualification for promotion to Assistant Professor (Selection Grade/Academic Level 12) both in colleges and the Universities must be removed based on the arguments mentioned above, especially since this does not entail any change in designation of teachers.

9. The insistence on research score prescribed in Table 2 of Appendix 3 for promotion to Associate Professor (in the University Departments) and Professor (both in colleges and Departments) reiterates the irrational quantification of research performance similar to the discredited API/PBAS system of the VI Pay Revision. Requirement of research scores should be removed for these promotions to emphasize quality and academic rigor in research publications.

10. The Draft Regulations insist on a minimum number of publications within a stipulated assessment period which is not only difficult but also detrimental to quality research. Regular, continuous and consistent evidence of research work

throughout the entire career rather than forced research in a straitjacketed manner would ensure quality research.

11. All incumbent teachers with three years or more experience as Associate Professors on 01.01.2016 should be placed at the appropriate stage of Level 14 in the revised Pay Matrix.

12. PhD/M.Phil Increments: Clause 3.5 of the Draft Regulations 2018 (p. 38) mentions that teachers are “entitled for grant of advance increments for having acquired PhD, M.Phil, M.Tech. etc.”, thus recognizing the need to reward higher qualification for teachers as well as to offset the losses accrued owing to late entry into the profession. The MHRD notification dated 02.11.2017 withdrawing PhD/M.Phil increments must be rectified and the advance increments for PhD/MPhil should be restored to teachers both at entry level and in service by notifying them in the revised Regulation.

13. 14 days Casual Leave should be allowed for all the teachers of colleges and universities instead of 8 days as mentioned in this regulation. However, Special Casual Leave may be restricted to 5 days.

14. **Para 3.9** The period of time taken by the in-service teachers for acquiring Ph D/M Phil degree or post doctoral research work, should be considered as teaching/research experience.

14. We oppose the move to introduce contractualisation of teaching positions in colleges and the Universities.

15. The continuation of the irrational and unacademic criteria of quantification in case of direct recruitment of teachers at every level (Assistant Professor, Associate Professor and Professor) should be done away with. The rigid structure suggested by the Tables 3A and 3B in Appendix III of the Draft Regulation does not take into account the variations in evaluation criteria across subjects, Universities and different generations of teachers.

16. In our opinion, giving 100% weightage to the interview performance of the candidate before the selection committee for the final selection, gives scope to prejudice and manipulation during the selection process as it is opaque and arbitrary. At the time of final selection of candidates, due **emphasis should be given to academic/research qualifications, adequate weightage to teaching experience** and performance in the interview for ensuring transparency, objectivity and fairness in the selection process.

17. We demand increase in percentage sharing of financial responsibility from the central government (at least up to 80%) to ensure uniform implementation of new pay scale at a time all over country.

18. Evidence of published research work should include not only research articles in peer reviewed/UGC list of journals, but also other academic/research work such as chapters in books, translations and edited books etc.