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* IN THE HIGH COURT OF DELHI AT NEW DELHI

Date of Decision: 06.07.2026

+ W.P.(C) 8560/2026
MS. NAVYA SHARMA & ANR.Petitioners
Through: Ms. Pragya Narayan, Adv. Manuraj Pillai, Advs.
versus
UNIVERSITY GRANT COMMISSION & ORS.Respondents
Through: Mr Parmanand Gaur SC for UGC with alongwith Mr. Vibhav Mishra and Ms. Megha Gaur Advocates
Adv Vinay Kaushik, GP
Ms. Radhika Bishwajit Dubey, CGSC Ms. Gurleen Kaur Waraich, Adv Mr. Kritarth Upadhyay, Adv Mr. Amulya Dev Mishra, Adv for R3
Mr Amitesh Kumar Ms. Priti Kumari, Advs. for R4

**CORAM:
HON'BLE MR. JUSTICE JASMEET SINGH**

: JASMEET SINGH, J (ORAL)

1. The present matter is almost covered by a previous judgment/Order of this Court dated 05.05.2026 passed in W.P.(C) No. 2399/2026. In view of that judgment/Order and using the same reasons and expressions, this Order is being passed.
2. This is a writ petition filed under Article 226 of the Constitution of India seeking the following prayers:-

“a) Issue an appropriate writ, order or direction directing the Respondents to recommence, permit or otherwise facilitate admissions to the M.Phil. (Clinical Psychology)



programme within a time-bound period, for Petitioners and other students belonging to the protected cohort identified by this Hon'ble Court in its judgment dated 05.05.2026;

b) Issue an appropriate writ, order or direction declaring that the Petitioners, being students covered by the judgment dated 05.05.2026 passed in W.P.(C) No. 2399/2026, shall not be denied an opportunity to pursue professional qualification and registration as Clinical Psychologists merely on account of the discontinuation of the M.Phil. (Clinical Psychology) programme;

c) Issue an appropriate writ, order or direction directing the Respondents to ensure that students covered by the judgment dated 05.05.2026 are not compelled to undertake a fresh four-year undergraduate degree in Psychology or otherwise retrace their academic journey as a condition for pursuing professional qualification and registration in Clinical Psychology;

d) Issue an appropriate writ, order or direction directing Respondent No. 1 and Respondent No. 2 to forthwith issue an appropriate public notification, circular and/or clarification, in compliance with the Judgment dated 05.05.2026 passed by this Hon'ble Court in W.P.(C) No. 2399/2026, MAN Mental Health Awareness and Networking Society v. Rehabilitation Council of India & Ors., clearly declaring that the new regulatory regime shall not apply to students belonging to the protected cohort identified therein and specifying the



transitional mechanism and academic pathway available to such students for obtaining professional qualification and registration as Clinical Psychologists.

e) Pending disposal of the present Writ Petition, direct the Respondents to reserve and/or create appropriate seats in the M.Phil. (Clinical Psychology) programme within a specified time-frame, for students covered by the judgment dated 05.05.2026, including the Petitioners herein;...”

3. The brief facts of the case are that the petitioners are students who have M.A. (Clinical Psychology) Programme after completing B.A. in other discipline and have been rendered pathless due to discontinuation of M. Phil. Programme.

4. The respondent No. 1 is the University Grants Commission (“UGC”), which oversees the standards of higher education. The respondent No. 2 namely, the Rehabilitation Council of India (“RCI”) is the statutory body regulating rehabilitation education and maintaining a central register of qualified professionals. The respondent No. 3 is the Department of Higher Education, Ministry of Education and the respondent No. 4 is the Amity University, Noida.

5. Pursuant to NEP 2020 respondent No. 1, notified PhD regulations 2022 and by Regulation 14 prohibited higher educational institutions from offering M.Phil programmes resulting in discontinuation of M.Phil in Clinical Psychology and psychiatrist social work, without simultaneously notifying a harmonised professional replacement pathway for regulated mental health disciplines. Regulation 14 reads as under:-

“14. Grant of M.Phil. Degree.- Higher Educational Institutions



shall not offer the M.Phil.(Master of Philosophy) programme.”

6. On 01.06.2023, an inter-ministerial meeting was convened by the Ministry of Health and Family Welfare and follow up meetings were held. On 29.08.2023, in the inter ministerial meeting the finalized replacement framework for discontinued M.Phil programme was identified with two alternative academic pathways which read as under:-

“(i) Allied Professions (four-year B.Sc. (Hons.) Clinical Psychology and B.A. (Hons.) Psychiatric Social Work to be regulated by Respondent No.4), and

(ii) General Academic (four-year undergraduate plus two-year master’s programmes to be regulated by Respondent No.1), with provision for practical training, PG-Diploma exit options”

7. The minutes recorded that existing M.Phil courses ought to be permitted to be continued for next five to six years in parallel with the newly proposed track to prevent disruption of the workforce in the mental health centre. The operative portion of the minutes reads as under:-



- Although both 3 and 4-years Bachelor courses are compatible with National Education Policy, the 4-year pathway is the more preferred one.
 - There should be a strong emphasis on clinical orientation/education under both the pathways starting from the first year of graduation under the Allied Profession track; and starting from the fourth year of graduation, and continuing into post-graduation under the general academic track.
 - Further, the National Education Policy (NEP) allows exits after successful completion of the first-year of masters courses. Accordingly, a PG Diploma in the respective domain can be offered for those students who choose to take only one year course (Graduation of 4 years+1 year of Masters course) in Clinical Psychology or Psychiatric social work. However, in that case, there should be clarity on what such a student can and cannot do after acquiring the PG Diploma qualification as compared to those who have completed two years of masters.
 - The transition plan from the present system to the newly proposed course curricula should be clear and explicit. The current M.Phil. courses may be allowed to continue for the next 5-6 years to ensure continuity. In parallel, there should be expeditious implementation of the courses under the two tracks along with putting in place the training capacity.
 - The Ph.D. options will be open to professionals coming out of both the pathways as per NEP/UGC norms.
8. Subsequently, the earlier M.Phil programme was extended for the two years.
9. On 30.01.2024, the UGC released the notice dated 30.01.2024, which reads as under:-



F.No.9-5/2023(PS/Misc.)

30th January, 2024 / 10 माघ, 1945**Public Notice**

UGC (Minimum Standards and Procedure for Award of Ph.D. degree) Regulations 2022, notified on 7th November 2022, discontinued M.Phil. programme in accordance with the recommendation of the National Education Policy 2020. Considering the vital role played by Clinical Psychologists and Psychiatric Social Workers in delivering mental health services, the UGC has decided to extend the validity of M.Phil. in Clinical Psychology and M.Phil in Psychiatric Social Work till 2025-26 academic session only, in partial relaxation to the above Regulations.

Accordingly, students can be admitted to an M.Phil. in Clinical Psychology and M.Phil in Psychiatric Social Work programmes by HEIs till 2025-26 academic session only.

(Manish Joshi)

10. A perusal of the notice shows that the earlier regime of candidates coming through various streams and getting an M.Phil degree in Clinical Psychology was discontinued from 2025-26 academic session.

11. Learned counsel for the petitioner challenges the same and urges the petition on the following grounds:-

“ i. Students who have completed or are presently pursuing M.A. Clinical Psychology under UGC-regulated universities are now compelled to again undertake an RCI-regulated M.A. programme in order to become eligible for registration in the Central Rehabilitation Register.

ii. Candidates who enrolled in B.A. programmes in allied or



non-psychology disciplines, who were earlier eligible to pursue M.A. Clinical Psychology, are now rendered ineligible under the new framework.

iii. Graduates who earlier lawfully completed a B.A. in another subject followed by an M.A. in Clinical Psychology are barred from entering the RCI-regulated pathway, even though their qualifications were previously recognised.

iv. Science-stream students are permitted to reach certain level of registration under CRR through a four-year B.Sc. (Clinical Psychology) pathway, whereas Humanities-stream students are required to undergo a substantially longer route of B.A. plus M.A., thereby imposing an unequal academic burden.

v. The continued operation of identically titled “M.A. Clinical Psychology” degrees under both UGC and RCI, without discontinuing or harmonising the UGC-regulated programme, is likely to mislead students, employers and the public.

vi. Under the earlier regime, the M.Phil (Clinical Psychology) was an advanced professional qualification above the master’s level. In the new regime, the replacement of the M.Phil with an M.A. of the same duration and title lowers the perceived academic standing of the qualification and is likely to adversely affect graduates’ prospects both within India and abroad.

vii. The new regime is also silent with respect to any higher-level degree, namely, M.Sc for the B.Sc graduates. It also does not confirm if the new M.A. course in the General Academic route is open for the B.Sc students.



viii. Graduates who, under the earlier regime, had completed a B.A. in a discipline other than Psychology followed by an M.A. in Clinical Psychology are now rendered ineligible for registration under Respondent No.1.

ix. The introduction of additional undergraduate psychology programmes, including the newly notified four-year Bachelor of Psychology (B.Psy) course under Respondent No.4/NCAHP, alongside the B.Sc. (Clinical Psychology) course and the B.A./M.A. route regulated by Respondent No.1, has multiplied parallel entry routes into the profession without any certainty with respect to scope of practice or eligibility for registration.

x. The creation of parallel undergraduate pathways has generated uncertainty as to which qualifications will ultimately permit registration in the Central Rehabilitation Register.”

12. Since the guidelines were issued by the respondent No. 2 in terms of the new policy, the present petition has been filed.

13. My attention has been drawn to the entry requirement which is as under:-

“Entry requirement

Minimum educational requirement for admission to this course will be 4 years B. A./B.Sc. degree in Psychology from a university recognized by the UGC with a minimum of 55% marks in aggregate. For SC/ST category, minimum of 50% marks in aggregate is essential, as per GOI. The candidates who have completed their graduation programme in 3 years shall have to pass fourth year Bridge Course or first year of Masters



Programme in Psychology with minimum of 550/, marks are also eligible.”

14. I have heard learned counsels for the parties.
15. The following tables are relevant to show the old regime and the new regime:

UNDERGRADUATE STUDENTS

TABLE III

UNDERGRADUATE STUDENTS- B.A./B.Sc. (Any stream/discipline other than Psychology) under UGC		
Education Level	Earlier Position (Pre-NEP/Old Regime)	Present Position under RCI (Impugned Framework)
Undergraduate	B.A./B.Sc in any stream/discipline other than Psychology under UGC (completed/ongoing)	B.A./B.Sc in any stream/discipline other than Psychology under UGC (completed/ongoing)
Post-graduate	Eligible for admission in M.A. (Psychology) under UGC	Not eligible for admission in M.A. Clinical Psychology
Masters in Philosophy	M. Phil (Clinical Psychology)	Constrained to enroll again in undergraduate course of B.A. in Psychology under UGC (4 years) /B.Sc in Clinical Psychology (4 years) under RCI



	RCI Registration (3+2+2=7 years for RCI)	RCI registration pathway only after repeating undergraduate studies through a fresh 4-year B.A. in Psychology under UGC/B.Sc. in Clinical Psychology under RCI followed by M.A. (Clinical Psychology), resulting in duplication of education and an excessive academic burden: 3 years (existing UGC undergraduate degree) – not recognised + 4 years fresh B.A. in Psychology under UGC/B.Sc. Clinical Psychology under RCI + 2 years M.A. (Clinical



		Psychology) = 9 years of RCI Registration Note: B.Sc (Clinical Psychology) student under RCI would still not be able to pursue M.A. (Clinical Psychology) or any other course to become Clinical Psychologist – only RCI Registration as ‘Clinical Assistant’
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POSTGRADUATE STUDENTS

TABLE IV

STUDENTS WHO HAVE ALREADY ENROLLED/COMPLETED B.A. (ANY STREAM OTHER THAN PSYCHOLOGY) M.A. (PSYCHOLOGY, CLINICAL PSYCHOLOGY AND OTHER BRANCHES OF PSYCHOLOGY) (UGC REGULATED)		
Education Level	Earlier Position (Pre-NEP/Old Regime)	Present Position under RCI (Impugned Framework)
Post graduate completed under UGC	B.A./B.Sc. (any stream other than Psychology) + M.A. (Psychology,	B.A./B.Sc. (any stream other than Psychology)



	Clinical Psychology and other branches of Psychology) (on going/completed) UGC Regulated Valid and recognized for RCI registration post completion of M.Phil (Clinical Psychology)	under UGC + M.A. (Psychology, Clinical Psychology and other branches of Psychology) (ongoing/completed) UGC Regulated Not recognised for RCI Registration
Masters in Philosophy	M. Phil (Clinical Psychology)	M.Phil pathway abolished Constrained to enroll again in undergraduate course of B.A. in Psychology under UGC/B.Sc. in Psychology (4 years) under RCI. After BA in Psychology, again constrained to enrol in M.A. Clinical Psychology for RCI Registration.



	RCI Registration 3 years B.A./B.Sc (any stream) + 2 years M.A. (Clinical Psychology) under UGC + 2 years M.Phil (Clinical Psychology) 7 years (earlier recognised pathway)	3 years (existing B.A./B.Sc.) + Ongoing 2 years M.A. (Clinical Psychology) under UGC + 4 years B.A./B.Sc Psychology under UGC + 2 years M.A. (Clinical Psychology) 11+years for RCI Registration to become Clinical Psychologist
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16. A perusal of the above tables shows that a student in B.A and B.Sc could go for M.A Psychology and obtain a degree in M.Phil (Clinical Psychology). There can be no ambiguity as far as student studying in class XII are concerned to take the new regime in accordance with the NEP 2020. The problem lies with students (presently the petitioners) who are pursuing B.A., B.SC in any stream or pursuing M.A Psychology. The said candidates now cannot proceed to go for M.Phil (Clinical Psychology) and obtain RCI registration.

17. The students who are undergoing B.A., B.SC in any stream/ discipline today or are undergoing M.A Psychology will have to go back to B.A., B.Sc



and M.A in Clinical Psychology and thereafter get RCI registration for pursuing a profession in Clinical Psychology.

18. A similar kind of situation has been considered in WP (C) 15086/2025 ***Prabhroop Kaur Kapoor v. Union of India*** and more particularly in para 46 to 51, which reads as under:-

“46. The petitioners constitute a limited category of students who had already acted upon the prevailing policy. Denying the facility results in serious and irreversible prejudice to the petitioners, who have already invested an academic year in preparation based on a legitimate expectation.

47. The law laid down in Surender Kumar Dhawan (supra) is also binding upon this Court that in questions of education policy and academic matters the Courts are to refrain from interfering. However, the said judgement also holds that if any provision or principle of law is to be interpreted, applied or enforced with reference to or connected with education, the Courts are required to step in. 9 This Court is neither required to nor is going into the legality, justifiability or the basis which has prompted/ necessitated the amendment to the examination policy. However, this court, in the present case, is concerned with interpretation, application and enforcement of amendment to Clause No. 43 (i) of Bye Laws only to the graduates of Class XII of 2025 batch, which is working to the detriment of the petitioner and is seeking to retrospectively withdraw a valuable vested right. The applicability was abrupt and thus, when the actions are



arbitrary and unreasonable, it is imperative to intervene in such a case.

48. CBSE's submission that no prejudice is caused since students may appear through NIOS does not cut much ice. The petitioners have demonstrated, prima facie, that several universities and competitive examination authorities insist upon a consolidated marksheet from a single recognised board. The option of NIOS, therefore, cannot be treated as a real or equivalent alternative, particularly where it compels students to repeat multiple subjects afresh.

49. CBSE, being the principal national body entrusted with regulating secondary and senior secondary education, cannot absolve itself of responsibility to ensure coherence of rules of senior secondary education with the rules the competitive of examination in this country. Education system in India is intertwined in such a manner that senior secondary education is not an isolated stage but forms the foundation upon which higher and professional education is built. The structure of higher education admissions in the country is intrinsically linked to the subjects studied and examinations taken in Class XII.

50. Eligibility criteria for professional courses are framed with reference to specific subject combinations at the senior secondary stage. For instance, admission to medical courses through NEET mandates the study of Physics, Chemistry, and Biology at the Class XII level, while engineering admissions



require Physics, Chemistry, and Mathematics.

51. These requirements presuppose that such subjects have been pursued as part of an integrated academic curriculum under a recognised Board. In this context, directing the students who have already passed Class XII under CBSE to seek recourse through NIOS disrupts the continuity of their academic record and undermines the coherence of the education system itself. In such a case the student would have to undergo the examination of all 5 subjects, which can never be a viable option.”

19. Applying the aforesaid principles to the facts of the present case, it is evident that students presently pursuing B.A., B.Sc. (in any discipline), or M.A. Clinical Psychology or have completed M.A. (Clinical Psychology) Course in 2026, had embarked upon their respective courses under a legitimate and well-founded expectation that they would be eligible to progress to the M.Phil. in Clinical Psychology and, thereafter, obtain registration with the RCI in accordance with the prevailing regime.

20. The abrupt introduction of the new regime, without any workable transitional mechanism, has the effect of completely foreclosing this established route. The consequence is that the students are effectively required to retrace their academic steps by re-enrolling in undergraduate and postgraduate programmes in Clinical Psychology, thereby losing years of academic effort and financial investment. Such a requirement is manifestly unreasonable and disproportionate. The denial of access to the M.Phil. programme under these circumstances amounts to a retrospective withdrawal



of a valuable right, which had already accrued to the students by virtue of their enrolment under the earlier regime.

21. In these circumstances, the application of the new regime to the present cohort of students would be arbitrary, inequitable, and violative of the principles of fairness that govern administrative action.

22. For the said reasons, the new regime will not be applicable to the students presently enrolled in B.A, B.Sc and M.A. (Clinical Psychology) programme or completed M.A. (Clinical Psychology) in 2026 but will be applicable to the Class XII students.

23. The aforesaid findings were already made by this Court in W.P.(C) 2399/2026 *vide* judgment/Order dated 05.05.2026, however, despite such judgment/Order being passed, respondent Nos. 1 and 2 have taken no steps to re-commence M. Phil Programme in Clinical Psychology.

24. Constrained by such inaction, petitioners have approached this Court. Accordingly, in view of the above, respondent Nos. 1 and 2 are directed as under:-

- a) Respondent Nos. 1 and 2 are directed to issue an appropriate clarification/ public notice within a period of 4 weeks clarifying that the applicability of the new regime shall not extend to students covered under earlier regime, in terms of the judgment/Order dated 05.05.2026 passed in WP(C) 2399/2026, namely, students presently pursuing B.A./B.Sc. (any stream) and M.A. (Psychology) under the UGC framework.
- b) Respondent Nos. 1 and 2 are further directed to take steps to recognise/recommence/continue M.Phil (Psychology) Programme for students pursuing B.A./B.Sc. (any stream/discipline) and M.A.



(Clinical Psychology) under UGC framework, starting from August, 2026 (Academic Session 2026-2027) and ensure continuity of such course for such period it serves to such students.

- c) Respondent Nos. 1 and 2 shall notify the concerned universities/institutions to re-commence/continue the M.Phil (Psychology) Programme within time-bound manner, so that the said course shall commence starting their Academic Session 2026-2027.

25. With these directions, the petition stands disposed of.

JASMEET SINGH, J

JULY 6, 2026 / (MS)

(corrected and released on 14.07.2026)