

**GOVERNMENT OF NATIONAL CAPITAL TERRITORY OF DELHI  
DIRECTORATE OF EDUCATION  
(PRIVATE SCHOOL BRANCH)  
OLD SECRETARIAT, DELHI-110054**

No. F.DE.15 (1575)/PSB/2023/ 8278-8282

Dated: 25/09/23

**Order**

WHEREAS, Delhi International School Edge, Sector-18, Dwarka, New Delhi – 110075 (School Id: 1821289) (hereinafter referred to as “the School”), run by the Great Harsh Educational & Welfare Society (hereinafter referred to as the “Society”), is a private unaided school recognized by the Directorate of Education, Govt. of NCT of Delhi (hereinafter referred to as “DoE”), under the provisions of Delhi School Education Act & Rules, 1973 (hereinafter referred to as “DSEAR, 1973”). The school is statutorily bound to comply with the provisions of the DSEAR, 1973 and RTE Act, 2009, as well as the directions/guidelines issued by the DoE from time to time.

AND WHEREAS, the manager of every recognized school is required to file a full statement of fees every year before the ensuing academic session under section 17(3) of the DSEAR, 1973 with the Directorate. Such statement is required to indicate estimated income of the school to be derived from fees, estimated current operational expenses towards salaries and allowances payable to employees etc. in terms of rule 177(1) of the DSEAR, 1973.

AND WHEREAS, as per section 18(5) of the DSEAR, 1973 read with sections 17(3), 24 (1) and rule 180 (3) of the above DSEAR, 1973, responsibility has been conferred upon to the DoE to examine the audited financial Statements, books of accounts and other records maintained by the school at least once in each financial year. Sections 18(5) and 24(1) and rule 180 (3) of DSEAR, 1973 have been reproduced as under:

Section 18(5): ‘the managing committee of every recognised private school shall file every year with the Director such duly audited financial and other returns as may be prescribed, and every such return shall be audited by such authority as may be prescribed’

Section 24(1): ‘every recognised school shall be inspected at least once in each financial year in such manner as may be prescribed’.

Rule 180 (3): ‘the account and other records maintained by an unaided private school shall be subject to examination by the auditors and inspecting officers authorised by the Director in this behalf and also by officers authorised by the Comptroller and Auditor-General of India.’

Thus, the Director (Education) has the authority to examine the full statement of fees filled under section 17(3) of the DSEA, 1973 and returns and documents submitted under section 18(5) of DSEA, 1973 read with rule 180(1) of DSER, 1973.

AND WHEREAS, besides the above, the Director (Education) is also required to examine and evaluate the fee increase proposal submitted by the private unaided recognized schools for some of the schools which have been allotted from Director (Education) before any increase in fee.

AND WHEREAS, the Hon’ble Supreme Court in the judgment dated 27.04.2004 held in Civil Appeal No. 2699 of 2001 titled Modern School Vs. Union of India and others has conclusively decided that under sections 17(3), 18(4) read along with rules 172, 173, 175 and 177, the DoE has the authority to regulate the fee and other charges, with the objective of preventing profiteering and commercialization of education.



AND WHEREAS, it was also directed by the Hon'ble Supreme Court, that the DoE in the aforesaid matter titled Modern School Vs. Union of India and Others in paras 27 and 28 in case of private unaided schools situated on the land allotted by DDA at concessional rates that:

*"27....(c) It shall be the duty of the Director of Education to ascertain whether terms of allotment of land by the Government to the schools have been complied with..."*

*28. We are directing the Director of Education to look into the letters of allotment issued by the Government and ascertain whether they (terms and conditions of land allotment) have been complied with by the schools.....*

*.....If in a given case, Director finds non-compliance of above terms, the Director shall take appropriate steps in this regard."*

AND WHEREAS, the Hon'ble High Court of Delhi vide its judgement dated 19.01.2016 in writ petition No. 4109/2013 in the matter of Justice for All versus Govt. of NCT of Delhi and Others, has reiterated the aforesaid directions of the Hon'ble Supreme Court and has directed the DoE to ensure compliance of terms, if any, in the letter of allotment regarding the increase of the fee by recognized unaided schools to whom land has been allotted by DDA/ land owning agencies.

AND WHEREAS, accordingly, the DoE vide order No. F.DE.15 (40)/PSB/2019/4440-4412 dated 08.06.2022, directing all the private unaided recognized schools, running on the land allotted by DDA/other land-owning agencies on concessional rates or otherwise, with the condition to seek prior approval of DoE for increase in fee, to submit their proposals, if any, for prior sanction, for increase in fee for the academic session 2022-23.

AND WHEREAS, in pursuance to order dated 08.06.2022 of the DOE, the school submitted its proposal for increase of fee for the academic session 2022-23. Accordingly, the order dispenses the proposal for increase of fee submitted by the school for the academic session 2022-23.

AND WHEREAS, in order to examine the proposals submitted by the schools for fee increase for justifiability or not, the DoE has evaluated the fee increase proposals of the school carefully in accordance with the provisions of the DSEAR, 1973, and other Orders/ Circulars issued from time to time by the DoE.

AND WHEREAS, in the process of examination of fee increase proposal filed by the aforesaid School for the academic session 2022-23, necessary records and explanations were also called from the school through email. Further, the school was also provided an opportunity of being heard on 19<sup>th</sup> May 2023 to present its justifications/clarifications on fee increase proposal including audited financial statements and based on the discussion, school was further asked to submit necessary documents and clarification on various issues noted. In the aforesaid personal hearing, the school's submissions were taken on record.

AND WHEREAS, on receipt of clarification as well as documents uploaded on the web portal for the fee hike post personal hearing, the fee hike proposal was evaluated by DOE and the key suggestions noted for improvement by the school are hereunder:

**A. Financial Suggestions for Improvement**

1. As per Accounting Standard 15 - 'Employee Benefits' issued by the Institute of Chartered Accountants of India states "*Accounting for defined benefit plans is complex because actuarial assumptions are required to measure the obligation and the expense and there is a possibility of actuarial gains and losses.*" Further, the Accounting Standard defines Plan Assets (the form of investments to be made against liability towards retirement benefits) as:

- a. Assets held by a long-term employee benefit fund; and
- b. Qualifying insurance policies

Para 57 of Accounting Standard 15 - 'Employee Benefits' issued by the Institute of Chartered Accountants of India, "*An enterprise should determine the present value of defined benefit obligations and the fair value of any plan assets with sufficient regularity that the amounts recognised in the financial statements do not differ materially from the amounts that would be determined at the balance sheet date.*"

On review of audited financial statements for FY 2019-20 to 2021-22, it is noted that the school has not obtained actuarial valuation report for gratuity and leave encashment liability. Also, the school has not made provision for gratuity and leave encashment in its books of accounts. However, the school in its reply dated 19.05.2023 has submitted an actuarial valuation report for gratuity and leave encashment liability as on 31 March 2023.

Accordingly, the school is directed to make provision for gratuity and leave encashment as per the actuarial valuation report. Also, the school is directed to ensure to protect the interest of the staff by investing equivalent amount in the plan assets for gratuity and leave encashment liability within 30 days from the date of issue of the order.

2. Clause 19 of Order No. F.DE. 15/(56)/Act/2009/778 dated 11 Feb 2009 states "*The tuition fee shall be so determined as to cover the standard cost of establishment including provisions for DA, bonus, etc., and all terminal, benefits as also the expenditure of revenue nature concerning the curricular activities.*"

Further clause 21 of the aforesaid order states "*No annual charges shall be levied unless they are determined by the Managing Committee to cover all revenue expenditure, not included in the tuition fee and 'overheads' and expenses on play-grounds, sports equipment, cultural and other co-curricular activities as distinct from the curricular activities of the school.*"

Rule 176 - 'Collections for specific purposes to be spent for that purpose' of the DSER, 1973 states "*Income derived from collections for specific purposes shall be spent only for such purpose.*"

Further, as per Clause 22 of Order No. F.DE./15(56)/ Act/2009/778 dated 11 Feb 2009 states "*Earmarked levies will be calculated and collected on 'no-profit no loss' basis and spent only for the purpose for which they are being charged.*"

Sub-rule 3 of Rule 177 of DSER, 1973 states "*Funds collected for specific purposes, like sports, co-curricular activities, subscriptions for excursions or subscriptions for magazines, and annual charges, by whatever name called, shall be spent solely for the exclusive benefit of the students of the concerned school and shall not be included in the savings referred to in sub-rule (2).*" Further, Sub-rule 4 of the said rule states "*The collections referred to in sub-rule (3) shall be administered in the same manner as the monies standing to the credit of the Pupils Fund as administered.*"

Also, earmarked levies collected from students are a form of restricted funds, which, according to Guidance Note on Accounting by Schools issued by the Institute of Chartered

Accountants of India, are required to be credited to a separate fund account when the amount is received and reflected separately in the Balance Sheet.

Further, the aforementioned Guidance Note lays down the concept of fund-based accounting for restricted funds, whereby upon incurrance of expenditure, the same is charged to the Income and Expenditure Account ('Restricted Funds' column) and a corresponding amount is transferred from the concerned restricted fund account to the credit of the Income and Expenditure Account ('Restricted Funds' column).

On review of audited financial statements for FY 2019-20 to 2021-22, it is noted that the school charges earmarked levies in the name of Transport Fee, Mid day Meal Charges, Health & Hygiene Charges, Watch & Ward Charges, Orientation Fee and Id Card Charges from students. However, the school has not maintained separate fund accounts for any of these earmarked levies and has been generating surplus from earmarked levies, which has been utilised for meeting other expenses of the school or has been incurring losses (deficit) that has been met from other fees/income. Details of surplus earned/ deficit incurred by the school for FY 2019-20 to 2021-22 are tabulated as below:

Particulars	Transport Fees*	Mid-day Meal Charges	Health & Hygiene Charges	Watch & Ward Charges	Orientation Fee	Id Card Charges/ Others*
<b>For the year 2021-22</b>						
Fee Collected during the year (A)	-	-	-	-	-	1,01,084
Expenses during the year (B)	59,73,202	-	-	15,35,311	2,21,415	-
<b>Difference for the year (A-B)</b>	<b>-59,73,202</b>	-	-	<b>-15,35,311</b>	<b>-2,21,415</b>	<b>1,01,084</b>
<b>For the year 2020-21</b>						
Fee Collected during the year (A)	-	-	-	-	-	1,20,381
Expenses during the year (B)	56,39,644	-	8,334	15,93,354	-	-
<b>Difference for the year (A-B)</b>	<b>-56,39,644</b>	-	<b>-8,334</b>	<b>-15,93,354</b>	-	<b>1,20,381</b>
<b>For the year 2019-20</b>						
Fee Collected during the year (A)	-	55,18,860	15,43,800	19,29,750	20,72,395	5,70,456
Expenses during the year (B)		45,06,062	20,59,484	21,60,372	21,99,460	-
<b>Difference for the year (A-B)</b>	-	<b>10,12,798</b>	<b>-5,15,684</b>	<b>-2,30,622</b>	<b>-1,27,065</b>	<b>5,70,456</b>

\*The school has not provided the details of income and expenses against these earmarked levies.

Based on the above-mentioned provisions, earmarked levies are to be collected only from the user students availing of the service/facility. In other words, if any service/facility has been extended to all the students of the school, a separate charge should not be levied for the service/facility as the same would get covered either under tuition fee (expenses on curricular activities) or annual charges (expenses other than those covered under tuition

fee). The charging of unwarranted fee or charging of any other amount/fee under different heads other than prescribed and accumulation of surplus fund thereof prima-facie is considered as collection of capitation fee in other manner and form. Therefore, the school is directed not to charge watch & ward charges and health & hygiene charges.

Further, the school is hereby directed to maintain separate fund account depicting clearly the amount collected, amount utilised and balance amount for each earmarked levy collected from students. Further, the school should evaluate costs incurred against each earmarked levy and propose the revised fee structure for earmarked levies during subsequent proposal for enhancement of fee ensuring that the proposed levies are calculated on no-profit no-loss basis and not to include fee collected from all students as earmarked levies.

Unintentional surplus, if any, generated from earmarked levies has to be utilized or adjusted against earmarked fees collected from the users in the subsequent year. Further, the school should evaluate costs incurred against each earmarked levy and propose the revised fee structure for earmarked levies during subsequent proposals for enhancement of fee ensuring that the proposed levies are calculated on a no-profit no-loss basis and not to include fees collected from all students as earmarked levies.

#### **B. Other Suggestions for Improvement**

1. As per Appendix II to Rule 180(1) of DSER, 1973, the school is required to submit final accounts i.e. receipts and payment account, income and expenditure account and balance sheet of the preceding year duly audited by a Chartered Accountant by 31<sup>st</sup> July.

As per Order No. F.DE-15/ACT-I/WPC-4109/PART/13/7905-7913 dated 16 April 2016, *"The Director hereby specify that the format of the return and documents to be submitted by schools under rule 180 read with Appendix -II of Delhi School Education Rules, 1973 shall be as per format specified by the Institute of Chartered Accountants of India, established under Chartered Accountants Act, 1949 (38 of 1949) in Guidance Note on Accounting by Schools (2005) or as amended from time to time by this Institute."*

On review of the audited financial statements for FY 2019-20 to 2021-22, it is noted that the schedules forming part of the financial statements are not appropriately prepared with previous year's figures against all items in the financial statements and are not signed and initialled by two representatives of the school authorised in this regard as per Bye laws or other governing documents.

Therefore, the school is directed to ensure that the financial statements (including Notes to Account), as per the requirements of Rule 180(1), are appropriately prepared, signed, provide previous year's figures against all items in the financial statements and ensure that the financial statements are prepared as per the requirements of aforementioned order of the Directorate and submitted to the Directorate within the prescribed timeline. The school is also directed to ensure that the entire set of financial statements (all pages including schedules) must be signed or initialled (as appropriate) by two representatives of the school authorised in this regard as per Bye laws or other governing documents.

2. Standard on Auditing (SA) 700 (Revised) – ‘Forming an Opinion and Reporting on Financial Statements’ notified by the Institute of Chartered Accountants of India include formats for issuing audit opinions on the financial statements by practicing Chartered Accountants.

Also, para 47 of SA 700 states “*The auditor’s report shall be dated not earlier than the date on which the auditor has obtained sufficient appropriate audit evidence on which to base the auditor’s opinion on the financial statements, including evidence that:*

- i. *All the statements that comprise the financial statements, including the related notes, have been prepared; and*
- ii. *Those with the recognized authority have asserted that they have taken responsibility for those financial statements.”*

On review of audited financial statement for FY 2019-20 to 2021-22, it is noted that the format as issued by the school’s auditor do not comply with auditors’ report format laid down in SA 700.

Therefore, the school is directed to ensure that the auditor’s report shall be in the format as laid down in SA 700. The compliance of the above direction shall be viewed at the time of evaluation of fee increase proposal of subsequent year.

3. As per the land allotment letter issued by the Delhi Development Authority to the Society in respect of the land allotted for the school, it shall ensure that percentage of freeship from the tuition fees, as laid down under rules by the Delhi Admn. from time to time, is strictly complied. The school shall ensure admission to the students belonging to weaker sections to the extent of 25% and grant freeship to them.

From the breakup of number of students provided by the school, it had admitted students under Economically Weaker Section (EWS) Category as under

Particulars	FY 2019-20	FY 2020-21	FY 2021-22
Total Students	648	694	743
EWS Students	9	10	20
% of EWS students	1%	1%	3%

As per table above, it can be noted that the school has not been complying with the directions of the Directorate and conditions of land allotment letter. Therefore, the concerned DDE (District) is requested to look into this matter and ensure compliance with the above directions.

4. The school should prepare a FAR, which should include details such as asset description, purchase date, supplier name, invoice number, manufacturer’s serial number, location, purchase cost, other costs incurred, depreciation, asset identification number, etc. to facilitate identification of asset and documenting complete details of assets at one place.

Accordingly, the school is directed to maintain and update fixed asset register with the relevant details mentioned above in accordance with the process for periodic physical

verification of assets and document the results of physical verification of assets. The same shall be verified at the time of evaluation of fee hike proposal for subsequent year.

**After detailed examination of all the material on record and considering the clarification submitted by the school, it was finally evaluated/ concluded that:**

- i. The total funds available for the FY 2022-23 amounting to INR 7,59,41,637 out of which cash outflow in the FY 2022-23 is estimated to be INR 5,83,71,722. This results in surplus of INR 1,75,69,915 for FY 2022-23 after all payments. The details are as follows:

Particulars	Amount (in INR)
Cash and Bank balances as on 31.03.22 as per Audited Financial Statements	63,56,024
Bank Overdraft Balance as on 31.03.2022 as per Audited Financial Statements	(37,13,697)
Investments as on 31.03.22 as per Audited Financial Statements	9,09,665
<b>Liquid Funds as on 31.03.2022</b>	<b>35,51,992</b>
Add: Fees for FY 2021-22 as per Audited Financial Statements (Refer Note 2 Below)	6,92,01,019
Add: Other Income for FY 2021-22 as per Audited Financial Statements (Refer Note 2 Below)	4,40,679
Add: Additional Income of Annual Charges and Development Fund (Refer Note 3 Below)	30,51,299
Less: Arrears of Annual Charges and Development Charges of FY 2020-21 collected in FY 2021-22	-
<b>Total Available Funds for FY 2022-23</b>	<b>7,62,44,989</b>
Less: Fixed Deposit in the joint name of Dy Director Education and Manager of the school as on 31.03.2022 (Refer Note 1 Below)	3,03,352
<b>Net Available Funds for FY 2022-23 (A)</b>	<b>7,59,41,637</b>
Less: Budgeted expenses for the session 2022-23 (Refer Note 4 Below)	<b>5,83,71,722</b>
<b>Total Estimated Expenditure for FY 2022-23 (B)</b>	<b>5,83,71,722</b>
<b>Net Surplus (A-B)</b>	<b>1,75,69,915</b>

**Note 1:** The detail of fixed deposit held by the school as per the audited financial statements for the FY 2021-22 is provided below:

Particulars	Amount (in INR)	Remarks
FDR in the joint name of Dy Director Education and Manager of the school	3,03,352	Deducted while calculating available funds of the school.
<b>Total</b>	<b>3,03,352</b>	

**Note 2:** All the fee and other income as per audited financial statements of main school and nursery school for the FY 2021-22 has been considered with the assumption that the amount received in FY 2021-22 will at least accrue during FY 2022-23.

**Note 3:** The Department vide its Order No.F.No.PS/DE/2020/55 dated 18.04.2020 and Order No.F.No.PS/DE/2020/3224-3231 dated 28.08.2020 had issued guidelines regarding the chargeability of fees during the pandemic COVID 2019. The department in both the above-mentioned orders directed to the management of all the private schools not to collect any fee except the tuition fee irrespective of the fact whether running on the private land or government land allotted by DDA/other land-owning agencies and not to increase any fee in FY 2020-21 till further direction.

The department in pursuance of the order dated 31.05.2021 in WPC 7526/2020 of Single Bench of the Hon'ble High Court of Delhi and interim order dated 07.06.2021 in LPA 184/2021 of the

Division Bench of Hon'ble High Court of Delhi and to prevent the profiteering and commercialization, again directed to the management of all the petitioners private unaided recognized schools through its Order No. F. No. DE.15 (114) /PSB /2021 /2165-2174 dated 01.07.2021:

- (i) "to collect annual school fee (only all permitted heads of fees) from their students as fixed under the DSEAR,1973 for the academic year 2020-21, but by providing deduction of 15% on that amount in lieu of **unutilized facilities** by the students during the relevant period of academic year 2020-21". And if the school has collected the fee in excess to the direction issued by the Hon'ble Court, the same shall be refunded to the parents or adjusted in the subsequent month of fee or refund to the parents.
- (ii) The amount so payable by the concerned students be paid in six equal monthly instalments w.e.f. 10.06.2021.

From review of the audited financial statements for the FY 2021-22 and based on the further information provided by the school post personal hearing, it has been noted that the school has reported 100% of tuition fee and 85% of annual charges and 50% of development fees in its audited financial statements of FY 2021-22. Therefore, the income collected by the school during the FY 2021-22 with respect to annual charges and development fees has been grossed up to make comparative income with the FY 2022-23. The detailed calculation has been provided below:

Particulars	Income as per Audited Income & Expenditure Account for the FY 2021-22	Income Considered while deriving the fund position for the FY 2022-23	Remarks
Tuition fee	5,18,86,926	5,18,86,926	As per details provided by the school, Annual Charges and Development Charges collected in FY 2021-22 at the rate of 85% thus, difference amount of INR 30,51,299 has been considered.
Annual Charges	1,04,43,976	1,22,87,031	
Development Charges	68,46,717	80,54,961	
<b>Total</b>	<b>6,91,77,619</b>	<b>7,22,28,918</b>	

**Note 4:** All budgeted expenditure proposed by the school amounting to INR 11,23,67,422 has been considered while deriving the fund position of the school except the following:

Head of Expenditure	2022-23 (in INR)	Amount disallowed (in INR)	Remarks
Salary - Teaching Staff	5,12,07,708	2,64,66,351	Restricted to 130% of expenditure incurred in FY 2021-22.
Gratuity	20,00,000	20,00,000	Refer Financial Suggestion No. 1
Leave encashment	5,00,000	5,00,000	
Outsource Services	10,31,340	10,31,340	The school has introduced new head of expenditure and has not provided any basis/justification for such expenditure.
Curricular Expenses	10,25,000	10,25,000	
Retainership Expenses	6,00,000	6,00,000	
Art & Craft	5,74,500	5,50,952	Restricted to 110% of expenditure incurred in FY
Insurance Expenses	5,77,220	4,44,651	



Head of Expenditure	2022-23 (in INR)	Amount disallowed (in INR)	Remarks
AMC Expenses	5,99,944	2,85,037	2021-22
Legal, consultancy & Professional charges	33,40,000	13,70,120	
EWS students Expenses	2,20,000	2,20,000	Neither Income nor expense has been considered while evaluating the fund position of the school
Mid-day Meal Expenses	48,50,200	48,50,200	
Health & Hygiene Expenses	28,83,240	28,83,240	
Watch & Ward	26,70,000	26,70,000	
Orientation Expenses	17,24,088	17,24,088	
ID Card Expenses	2,12,000	2,12,000	
Transport expenses	71,62,720	71,62,720	
<b>Total</b>	<b>8,11,77,960</b>	<b>5,39,95,700</b>	

**Note 5:** In accordance with Section 10(1) of Delhi School Education Act 1973, scales of pay and allowance, medical facilities, pension gratuity, provident fund, and other prescribed benefits of the employees of a recognized private school shall not be less than those of the employees of the corresponding status in schools run by the appropriate authority.

Further, Directorate of Education has adopted the Central Civil Serviced (Revised Pay) Rules, 2016 vide Circular No 30-3(17)/(12)/VII pay Comm./2016/11006-11016 dated 19.08.2016 and No. 30-3(17)/(12)/VII pay Comm./Coord./2016/12659-12689 dated 14.10.2016 for employees of Government Schools.

Further, in exercise of the powers conferred under clause (xviii) of Rule 50 of the Delhi School Education Rules, 1973, vide Competent Authority order No DE.15 (318)/PDB/2016/18117, dated 25.08.2017, the managing committees of all Private unaided Recognized Schools have already been directed to implement central Civil Services (Revised Pay) Rule, 2016 in respect of the regular employees of the corresponding status with effect from 01.01.2016 (for the purpose of pay fixation and arrears). Further, guidelines/detailed instructions for implementation of 7th CPC recommendations in Private Un-aided Recognized Schools of Delhi has been issued vide DOE order dated 17.10.2017.

As per school's reply during hearing, it was held that the school has not implemented 7<sup>th</sup> CPC recommendations. Also, the school has not proposed salary arrears in the budget for FY 2022-23 and has not provided for salary arrears in its financial statements. Hence, no impact of salary arrears has been considered while evaluating the funds availability position of the school.

- ii. In view of the above examination, it is evident that the school have adequate funds for meeting all the operational expenditure for the academic session 2022-23. In this regard, Directorate of Education has already issued directions to the schools vide order dated 16.04.2010 that,

*“All Schools must, first of all, explore and exhaust the possibility of utilising the existing funds/reserves to meet any shortfall in payment of salary and allowances, as a consequence of increase in the salary and allowance of the employees. A part of the reserve fund which has not been utilised for years together may also be used to meet the shortfall before proposing a fee increase.”*

AND WHEREAS, in the light of the provisions of DSEA, 1973, DSER, 1973, guidelines, orders and circulars issued from time to time by this Directorate, the proposal of the school for the session 2022-23 have been evaluated and certain financial suggestions have been identified

(appropriate financial impact has been taken on the fund position of the school) and certain procedural suggestions which were also noted (appropriate instruction against which have been given in the order) that the sufficient funds are available with the school to carry out its operations for the academic session 2022-23.

AND WHEREAS, the fee proposal of the school along with relevant materials were put before the Director of Education for consideration and who after considering all the material on the record, and after considering the provisions of section 17(3), 18(5), 24(1) of the DSEA, 1973 read with Rules 172, 173, 175 and 177 of the DSER, 1973 has found that sufficient funds are available with the school for meeting financial implication for the academic session 2022-23.

AND WHEREAS, it is noticed that the school has incurred INR 3,52,71,432 in contravention of Rule 177 and other provisions of DSEAR, 1973 and other orders issued by the departments from time to time. Therefore, the school is directed to recover the aforesaid amount from society/ management. The receipts along with copy of bank statements showing receipt of the above-mentioned amount should be submitted with DoE, in compliance of the same, within 30 days from the date of issue of the order. Non-compliance with this direction shall be viewed seriously as per the provision of DSEA&R, 1973 without providing any further opportunity of being heard.

AND WHEREAS, the act of the school of charging unwarranted fee or any other amount/fee under head other than the prescribed head of fee and accumulation of surplus fund thereof tantamount to profiteering and commercialization of education as well as charging of capitation fee in other form.

AND WHEREAS, the school is directed, henceforth to take necessary corrective steps on the financial and other suggestion noted during the above evaluation process and submit the compliance report within 30 days from the date of issue of the order to the D.D.E (PSB).

Accordingly, it is hereby conveyed that the proposal for fee hike of **Delhi International School Edge, Sector-18, Dwarka, New Delhi – 110075 (School Id: 1821289)** filed by the school in response to the Order No. F.DE.-15(40)/PSB/2019/4440-4412 dated 08.06.2022 for the academic session 2022-23, is **rejected** by the Director (Education) with the above conclusion and suggestions.

Further, the management of said School is hereby directed under section 24(3) of DSEA&R 1973 to comply with the following directions:

1. Not to increase any fee/charges during FY 2022-23. In case, the school has already charged increased fee during FY 2022-23, the School should make necessary adjustments from future fee/refund the amount of excess fee collected, if any, as per the convenience of the parents.
2. To ensure payment of salary is made in accordance with the provision of Section 10(1) of the DSEA, 1973. Further, the scarcity of funds cannot be the reason for non-payment of salary and other benefits admissible to the teachers/ staffs in accordance with section 10 (1) of the DSEA, 1973. Therefore, the Society running the school must ensure payment to teachers/ staffs accordingly.

3. To utilize the fee collected from students in accordance with the provisions of Rule 177 of the DSER, 1973 and orders and directions issued by this Directorate from time to time.

Non-compliance of the order or any direction herein shall be viewed seriously and will be dealt with in accordance with the provisions of section 24(4) of Delhi School Education Act, 1973 and Delhi School Education Rules, 1973.

This is issued with the prior approval of the Competent Authority.

*BK*  
*25/09/23*

**(Bimla Kumari)**  
**Deputy Director of Education**  
**(Private School Branch)**  
**Directorate of Education, GNCT of Delhi**

**To**  
**The Manager/ HoS**  
**Delhi International School Edge,**  
**Sector-18, Dwarka,**  
**New Delhi – 110075 (School Id: 1821289)**

No. F.DE.15 (1575)/PSB/2023 / 8278-8282

Dated: 25/09/23

**Copy to:**

1. P.S. to Principal Secretary (Education), Directorate of Education, GNCT of Delhi.
2. P.S. to Director (Education), Directorate of Education, GNCT of Delhi.
3. DDE (South West-B) ensure the compliance of the above order by the school management.
4. In-charge (I.T Cell) with the request to upload on the website of this Directorate.
5. Guard file.

*BK*  
*25/09/23*

**(Bimla Kumari)**  
**Deputy Director of Education**  
**(Private School Branch)**  
**Directorate of Education, GNCT of Delhi**