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W.A.No.1591 of 2026

IN THE HIGH COURT OF JUDICATURE AT MADRAS

DATED: 29.06.2026

CORAM :

THE HONOURABLE MR. SUSHRUT ARVIND DHARMADHIKARI,
CHIEF JUSTICE

AND

THE HONOURABLE MR.JUSTICE G.ARUL MURUGAN

WA No.1591 of 2026
and CMP No.14681 of 2026

Syeeda Asma
W/o.Abdul Rahman,
No.17, Mosque Street,
Muthapudupet, IAF Avadi,
Chennai - 600055.

Appellant(s)

Vs

1. The Registrar University of Madras
Navalar Nagar, Chepauk, Triplicane,
Chennai - 600005.
2. The Director
Institute of Distance Education,
University of Madras, IDE Building,
Navalar Nagar, Chepauk, Triplicane,
Chennai - 600 005.
3. University Grants Commission
Rep by its Secretary,
Bahadur Shah Zafar Mag,
New Delhi - 110 002.

Respondent(s)



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PRAYER: Appeal filed under Clause 15 of the Letters Patent to set aside the order passed by the learned Single Judge in WP No.40698 of 2025 dated 23.02.2026.

For Appellant(s): Mr.S.Mohammed Imran

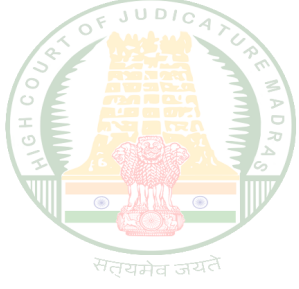
For Respondent(s): Mr.R.Thirunavukarasu
for R1 and R2

Mrs. V.Sudha for R3

JUDGMENT

(Delivered by the Hon'ble Chief Justice)

This intra-court appeal, preferred under Clause 15 of the Letters Patent, mounts a challenge to the final order dated 23.02.2026 passed by the learned Single Judge in W.P.No.40698 of 2025. By the said order, the learned Single Judge declined to quash the regulatory notifications issued by the respondents which effectively discontinued the M.Sc. Psychology programme via distance education mode. However, the learned Single Judge moulded the relief by directing that the appellant be accommodated in a regular stream in the ensuing academic year without reference to her merit rank. Unsatisfied with this equitable accommodation, the appellant has knocked on the doors of this court, seeking a total reversal of the impugned order.

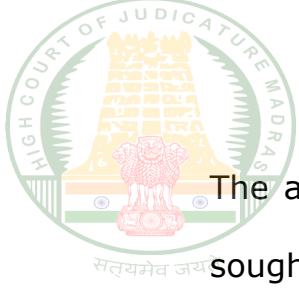


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2.1. The nub of the matter is that the appellant completed her Bachelor of Science (B.Sc.) in Psychology from the Tamil Nadu Open University during the period from July 2020 to June 2024. Aspiring to scale higher academic heights, she applied for the Post Graduate M.Sc. Psychology course through the distance education mode offered by the University of Madras for the academic year 2025. She was granted provisional admission on 02.07.2025.

2.2. The appellant's academic pursuit hit a roadblock when the University, via a communication dated 30.09.2025, informed her that the University Grants Commission (UGC) had clamped a total prohibition on conducting Post Graduate courses in Psychology via the distance education mode. The pivot of this policy shift was the enactment of the *National Commission for Allied and Healthcare Professions (NCAHP) Act, 2021*, which classified Psychology as a professional course, which cannot be effectively taught through correspondence or distance modes.

2.3. All other candidates co-admitted with the appellant bowed to the statutory reality and opted for alternative permissible courses.



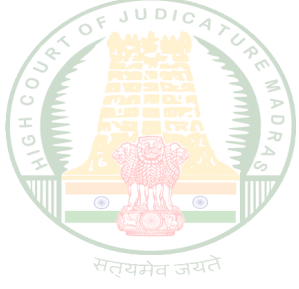
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The appellant stood out in isolation, refusing to alter her course, and sought to invalidate the regulatory edict through a writ of certiorarified mandamus. The learned Single Judge rejected the primary challenge, but granted a protective pathway for a regular seat, triggering the present appeal.

3. Mr.Mohammed Imran, learned counsel for the appellant submitted that:

(i) The appellant's admission was secured on 02.07.2025, whereas the formal communication of the UGC's decision was ventilated only on 12.08.2025. It is argued that a policy cannot operate retrospectively to dismantle a vested right.

(ii) The University's act of granting a provisional admission card generated a legitimate expectation in the mind of the candidate that she could complete her course seamlessly. Discontinuing a student midway is a disaster for her career. The respondents ought to have permitted the existing batch to graduate by implementing the ban prospectively.



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4. Learned counsel for the respondents countered the aforesaid submissions as under:

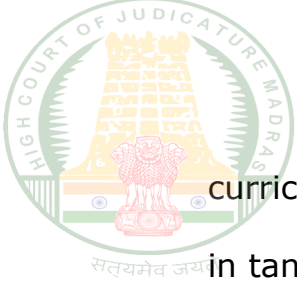
(i) With the enforcement of the NCAHP Act, 2021, Psychology has been statutorily recognized as a healthcare profession requiring intense, rigorous clinical training.

(ii) The policy decision was not a sudden afterthought; the Distance Education Bureau had already taken a decision on 22.04.2025, well before the appellant's provisional admission.

(iii) The University cannot run an entire academic program, organize examinations, and provide clinical supervision for a solitary student when the entire batch has migrated to other streams.

5. We have considered the rival submissions and scrutinised the records with care.

6. It is a cardinal principle of constitutional law that in matters of educational policy, academic standards, and the formulation of

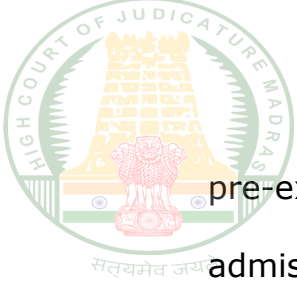


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curricula, the courts must exercise judicial deference. The UGC, acting in tandem with the statutory framework of the NCAHP Act, 2021, came to a conclusion that a professional field like Psychology, which deals with the complexities of human mental health, cannot be effectively taught through correspondence or distance modes.

7. The argument that the appellant's provisional admission creates an right of estoppel is legally unsustainable. It is trite law that there can be no promissory estoppel against a statute or public policy formulated in the larger interest of society. Private interest must yield to public interest. When a professional discipline is uniformly barred from distance education across the length and breadth of India, this court cannot carve out an exemption for a single candidate.

8. The appellant contends that because the public communication of the ban was issued on 12.08.2025, it cannot touch an admission granted on 02.07.2025. We find this argument to be a mere fallacy. The deliberations and foundational policy choices were set in stone on 22.04.2025, long before the prospectus was processed. The formal notification is merely an administrative manifestation of a



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pre-existing regulatory trajectory. An institution cannot grant a valid admission contrary to the UGC's clear intent.

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9. We find that the learned Single Judge has exercised the equitable jurisdiction under Article 226 of the Constitution of India with immense empathy. Recognizing that the appellant lost a brief period due to the discontinuance of the course, the writ court directed the allocation of a regular seat in M.Sc. Psychology in the ensuing academic year without reference to her merit position. This is an extraordinary indulgence.

10. A single student cannot demand that an entire university apparatus, along with its academic machinery, and examination bodies, be deployed exclusively for her distance education course in defiance of nationwide statutory prohibitions. The learned Single Judge has already balanced the scales of equity perfectly. No further interference is warranted.

In the result, the writ appeal is dismissed. The impugned order of the learned Single Judge dated 23.02.2026 passed in W.P.No.40698



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of 2025 is hereby affirmed in its entirety. There shall be no order as to costs. Consequently, interim application stands closed.

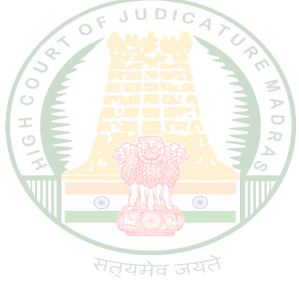
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(SUSHRUT ARVIND DHARMADHIKARI,CJ) (G.ARUL MURUGAN,J)
29.06.2026

Index : Yes
Neutral Citation : Yes
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THE HON'BLE CHIEF JUSTICE
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G.ARUL MURUGAN,J.

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