

**Chapter II**  
**Economic, Social and General Sectors**  
**and PSUs**



## CHAPTER-II

### 2.1 Introduction

**2.1.1** The audit of 48 Departments of Government of NCT of Delhi along with 15 Public Sector Undertakings (PSUs) and 61 other entities (Autonomous Bodies/Authorities, *etc.*) thereunder, comes under audit jurisdiction of the Principal Accountant General (Audit), Delhi. The details of Departments and respective entities are given in **Annexure 2.1** and summarised in **Table-2.1.1**.

**Table-2.1.1: List of Departments and entities under audit jurisdiction**

Sl. No.	Name of Department(s)	Number of		
		Public Sector Undertakings (PSUs)	Other Entities (Autonomous Bodies/ Authorities, <i>etc.</i> )	Total
1.	Public Works Department	-	-	-
2.	Irrigation and Flood Control Department	-	-	-
3.	Urban Development	2	2	4
4.	Power Department	4	1	5
5.	Tourism Department	1	1	2
6.	Archeology Department	-	-	-
7.	Delhi Archives	-	-	-
8.	Art, Culture and Language	-	8	8
9.	Trade & Taxes Department	-	-	-
10.	State Excise and Expenditure	-	-	-
11.	Department of Finance	1	1	2
12.	Department. of Planning	-	-	-
13.	Directorate of Economics & Statistics	-	-	-
14.	Home Department	-	-	-
15.	Department. of Law, Justice and Legislative. Affairs	-	1	1
16.	Registrar General, Delhi High Court	-	-	-
17.	Directorate Of Prosecution	-	-	-
18.	Directorate of Vigilance and Anti-Corruption	-	-	-
19.	Revenue Department	-	-	-
20.	Chief Electoral Office	-	-	-
21.	Secretariat of Vidhan Sabha	-	-	-
22.	General Administrative Department	-	-	-
23.	Department of Administrative Reforms	-	-	-
24.	Secretariat of Lt. Governor	-	-	-
25.	Lokayukta	-	-	-
26.	Public Grievance Commission	-	-	-
27.	Department of Information and Publicity	-	-	-
28.	Land and Building Department	-	-	-
29.	Department of Industries	1	-	1
30.	Department of Information Technology	1	-	1

31.	Department of Health and Family Welfare	-	14	14
32.	Social Welfare	-	-	-
33.	Department of Women & Child Development	-	2	2
34.	Department for the Welfare of SC/ST/Minorities	1	-	1
35.	Education	-	3	3
36.	Higher Education	-	15	15
37.	Training and Technical Education	-	6	6
38.	Services Department	1	-	1
39.	Department of Labour	-	2	2
40.	Directorate of Employment	-	-	-
41.	Department of Food, Civil supply and Consumer Affairs	1	-	1
42.	Development Department	-	1	1
43.	Directorate of Agricultural Marketing	-	-	-
44.	Directorate of Weights and Measures	-	-	-
45.	Registrar Co-operative Societies	-	-	-
46.	Department of Forest and Wild Life	-	-	-
47.	Department of Environment	-	2	2
48.	Transport Department	2	2	4
<b>Total</b>		<b>15</b>	<b>61</b>	<b>76</b>

### Audit Coverage

**2.1.2** During the years 2019-20 and 2020-21, the office of the Principal Accountant General (Audit), Delhi conducted the compliance audit of 140 and 126 units out of total 460 and 770 auditable units under 48 Departments of Government of NCT of Delhi. This Report contains results of audit of four PAs/SSCA and five compliance audit paragraphs pertaining to eight Departments.

### Audit Process and Response of Government to Audit

**2.1.3** Audit affords a four stage opportunity to the audited units/departments to elicit their views on audit observations, viz.

**Audit Memos:** Issued to the head of the audited unit during the field audit to be replied during the audit itself.

**Inspection Reports (IR):** Issued within a month of the completion of audit to be replied by the head of the audited unit within four weeks.

**Draft Paragraphs:** Issued to the heads of the Departments under whom the audited units function for submission of Departmental views within a period of six weeks for consideration prior to their being included in the CAG's Audit Report.

**Exit Conference:** Opportunity is given to the head of departments and State Government to elicit Government/Departmental views on the audit observations prior to finalisation of the Audit Report.

In all these stages, Audit strives to provide full opportunity to audited units/head of Departments/State Government to provide rebuttals and clarifications and only when the departmental replies are not received or are not convincing, the audit observations are processed for inclusion in the Inspection Report or CAG's Audit Report, as the case may be. However, in most of the cases, the audited entities do not submit timely and satisfactory replies as indicated below:

- **Status of Replies to Inspection Reports**

A detailed review of IRs issued up to March 2021 to 476 Drawing and Disbursing Officers (DDOs) pertaining to 48 Departments revealed that 11511 paragraphs contained in 2423 IRs were outstanding for settlement for want of convincing replies as on 31 March 2021.

The status of outstanding IRs is given in **Table-2.1.2**.

**Table-2.1.2: Outstanding IRs and Paragraphs (issued up to 31 March 2021) as on 31 March 2021**

Sl. No.	Period	No. of outstanding IRs (per cent)	No. of outstanding Paras (per cent)
1	2020-21	123 (5.08)	1146 (9.96)
2	More than 1 year to 3 years	529 (21.83)	3763 (32.69)
3	More than 3 years to 5 years	376 (15.52)	1776 (15.43)
4	More than 5 years	1395 (57.57)	4826 (41.92)
<b>Total</b>		<b>2423 (100)</b>	<b>11511 (100)</b>

Source: Information compiled by Audit

During the period 2019-20 and 2020-21, three Audit Committee Meetings with the Departmental officers were held, in which only 10 Paras were settled in 2019-20.

- **Status of Replies to Audit paragraphs included in Audit Report for the year 2019-20 and 2020-21**

For the present Audit Report 2019-21, Audit Reports of four Performance Audits (PAs)/SSCAs and five compliance audit paragraphs were forwarded to the Principal Secretaries/Secretaries of the concerned administrative Departments to elicit their views on the audit observations. Replies/responses of the Government in respect of Audit Reports of four PAs/SSCAs and three compliance audit paragraphs have been received. The replies of the Government in respect of Audit Report of two audit paragraphs are still awaited (May 2022).

### **Follow up action taken on earlier Audit Reports**

#### **2.1.4 Replies outstanding to Audit Paragraphs included in earlier Audit Reports**

To ensure accountability of the executives to the issues dealt with in various Audit Reports, the administrative departments are to issue *suo-motu* Action Taken Notes (ATNs) on all audit paragraphs and performance audits featuring

in the Audit Reports irrespective of the fact whether these are taken up for discussion by the Public Accounts Committee (PAC) or not. These ATNs are to be submitted to the PAC duly vetted by the Principal Accountant General (Audit), Delhi within a period of four months from the date of presentation of Audit Reports in the Legislative Assembly of Delhi.

The position of ATNs not received is given in **Table-2.1.3**.

**Table 2.1.3: ATNs notes not received (as of May 2022)**

Audit Report (PSUs/ Non-PSUs) for the year ended 31 March	Date of placement of Audit Report in the State Legislature	Total Performance Audit (PAs) and Compliance Audit Paragraphs(CAPs) in the Audit Report		Number of PAs/CAPs Paragraphs for which ATNs were not received	
		PAs	CAs	PAs	CAs
<b>A. Social, General and Economic Sectors (Non-PSUs)</b>					
2013	01.08.2014	05	10	1	4
2014	30.06.2015	05	15	1	3
2015	13.06.2016	04	17	2	3
2016	10.03.2017	05	15	2	0
2017	03.04.2018	03	13	2	5
<b>Total</b>		<b>22</b>	<b>70</b>	<b>8</b>	<b>15</b>
<b>B. PSUs</b>					
2012	02.04.2013	1	3	0	3
2013	01.08.2014	1	7	0	1
2014	30.06.2015	1	2	0	2
2015	13.06.2016	1	6	1	4
2016	10.03.2017	1	6	1	3
2017	03.04.2018	1	8	1	5
2018	03.12.2019	1	2	1	2
<b>Total</b>		<b>7</b>	<b>34</b>	<b>4</b>	<b>20</b>
<b>Grand Total (A+B)</b>		<b>29</b>	<b>104</b>	<b>12</b>	<b>35</b>

Source: Information compiled by Audit

• **Discussion of Audit Reports by Public Accounts Committee (PAC)**

During the years 2012-13 to 2017-18, 22 Performance Audits and 70 Compliance Audit Paragraphs related to Departments/Autonomous Bodies were reported in these Audit Reports. Of these, PAC had taken up two Performance Audit and five Compliance Audit Paragraphs (CAPs) for discussion. The status of PAC discussion as on 30 September 2021 is detailed in **Table-2.1.4**.

**Table 2.1.4: Status of PAC discussion, NCT of Delhi, Vidhan Sabha**

Status	PAs/CAs of Audit Report pertaining to Social, General & Economic Sector (Non-PSU) for the years 2012-13 to 2018-19
Number of total Audit Paras	92 (22 PAs +70 CAs)
Taken up by PAC for discussion	7 (2PAs + 5 CAs)
Recommendation made by PAC	Nil
ATN received	Nil
Action taken by the Department	-

Source: Information compiled by Audit

- **Discussion of Audit Reports by Committee on Public Undertaking (COPU)**

During the years 2012-13 to 2018-19, 07 Performance Audits and 34 Compliance Audit Paragraphs of Public Sector Undertakings were reported in these Audit Reports. Of these, COPU had taken up 02 Performance Audit and 05 Compliance Audit Paragraphs for discussion. The status of COPU discussion as on 30 September 2021 is detailed in **Table-2.1.5**.

**Table-2.1.5: Status of COPU discussion, NCT of Delhi, Vidhan Sabha**

Status	PAs/TAs/CAs of Audit Report pertaining to PSUs for the year 2012-13 to 2018-19
Number of total Audit Paras	41 (7PAs + 34 TAs)
Taken up by COPU for submission of written reply	7(2PAs + 5 TAs)
Recommendation made by COPU	Nil
ATN received	Nil
Action taken by the Department	-

Source: Information compiled by Audit

### **Status of laying of Annual Reports/Accounts along with Separate Audit Reports of Entities in the State Legislature**

**2.1.5** Details of Annual Reports/Accounts along with Separate Audit Reports (SARs) of two entities which are yet to be laid in the State Legislature are as depicted in **Table-2.1.6**.

**Table-2.1.6: Statement showing details of Separate Audit Reports yet to be laid in the State Legislature**

Sl. No.	Name of the Entities	Year upto which SAR has been issued to the Government	Year upto which SAR laid in the State Legislature*
1	Delhi Electricity Regulatory Commission (DERC)	2020-21	2019-20
2	Delhi Jal Board (DJB)	2014-15	2003-04
3	Delhi Finance Corporation (DFC)	2019-20	2014-15
4	Delhi State Legal Service Authority (DSLISA)	2018-19	Status not known
5	Delhi Transport Corporation (DTC)	2019-20	2019-20
6	Ambedkar University (AU)	2019-20	2016-17
7	Indraprastha Institute of Information Technology Delhi (IIIT-D)	2019-20	2019-20
8	Guru Gobind Singh Indraprastha University (GGSIPU)	2018-19	2016-17
9	Delhi Technical University (DTU)	2019-20	2018-19
10	Indira Gandhi Delhi Technological University for Women (IGDTUW)	2017-18	2017-18
11	Netaji Subhas University of Technology (NSUT)	2018-19	2008-09
12	Delhi Building and other Construction Workers Welfare Board (DBOCWWB)	2016-17	2016-17
13	DTC EPF Trust (DTC EPFT)	2019-20	2017-18

\*Source: Minutes of Assembly sessions as available on Delhi Assembly Website

### Recoveries at the instance of Audit

**2.1.6** Audit findings, involving recoveries that came to notice in the course of test audit of accounts of the departments of the State Government, were referred to various departments' Drawing and Disbursing officer (DDOs) for confirmation and further necessary action under intimation to Audit

During 2019-20 and 2020-21, against audit findings involving recovery of ₹ 15.51 crore and ₹ 9.93 crore pointed out in 185 and 101 cases respectively, the DDOs concerned had effected recovery of ₹ 2.13 crore and ₹ 2.3 crore (including recovery of previous years) in 71 and 54 cases.

### 2.1.7 Conclusion

Not submitting replies to Audit, arrears in preparation of annual accounts of State Entities and not laying the Annual Report/Accounts along with SAR in the State Legislature adversely affects accountability and transparency in the Government and is therefore a cause of concern.

## Planning Department

### 2.2 Direct Benefit Transfer

#### 2.2.1 Introduction to Direct Benefit Transfer

Direct Benefit Transfer (DBT) is a major reform initiative launched by the Government of India on 1 January 2013, with the objectives of transferring the benefits and subsidies of various social welfare schemes directly in the bank account of the beneficiary by bringing timeliness, efficiency, effectiveness and transparency in the system.

According to 'Standard Operating Procedure (SOP) for DBT payments', issued by the Government of India (GoI) the following process is to be followed by the implementing Departments:

- Beneficiary identification and their enrolment in Department Scheme Management Software (SMS);
- Beneficiary validation/registration on Public Finance Management System (PFMS).
- Generation of payment file instructions.
- Processing of payment file and payment to beneficiary.

#### 2.2.2 Framework of DBT in National Capital Territory of Delhi

As per Census 2011, Delhi has a population of 167.88 lakh residents, out of which 16.96 lakh residents were below poverty line.

In order to aggregate benefit transfer information under DBT, a State DBT Portal ([dbt.delhi.gov.in](http://dbt.delhi.gov.in)) was created on 23 April 2018 and integrated with the DBT Bharat Portal ([dbtbharat.gov.in](http://dbtbharat.gov.in)). Main features of the State DBT portal are: (i) aggregated Dashboard of DBT Schemes; (ii) scheme and department wise reports; (iii) Progress Monitoring System for DBT applicable schemes/services; and (iv) DBT Scheme Code Management.

As per DBT Portal ([dbt.delhi.gov.in](http://dbt.delhi.gov.in)), Government of National Capital Territory of Delhi (GNCTD) has implemented DBT for 73 schemes which included 37 Centrally Sponsored Schemes (CSS) and 36 State Sponsored Schemes. These schemes were being implemented by 10 Departments of GNCT of Delhi.

A State DBT Cell (DBT Cell) was functioning under the Planning Department of GNCTD which coordinates with all Departments in compiling the list of schemes and programs to which DBT may be applicable. If it is found that DBT would be useful for any scheme, then filled-up proforma for uploading the scheme on the State DBT portal is submitted by the Department concerned to the DBT cell. The DBT Cell uploads the information provided by the Department on the DBT Bharat portal to create a unique code for the scheme.

After this, the unique code so generated and rest of the information in the proforma is uploaded on the State DBT portal. In this way, the scheme becomes operational on the State DBT portal for the Department concerned. A departmental user is created for each department and user-id and password are assigned for accessing the scheme placed on the State DBT portal.

DBT Cell monitors the progress made by Departments with regards to DBT on-boarding process viz. (i) beneficiary database digitization, (ii) seeding of beneficiary database with validated Aadhaar number, and (iii) transfer of cash benefits using electronic means.

### **2.2.3 Audit objectives**

The Performance Audit was conducted to ascertain whether -

- (i) necessary process re-engineering was done for implementation of DBT so as to minimize intermediary levels and delay in payments to intended beneficiaries, pilferage and duplication;
- (ii) the required infrastructure and organizational set up were put in place for effective management of DBT;
- (iii) identification of beneficiaries was adequate, foolproof and they actually received the benefits; and
- (iv) adequate grievance redressal mechanism was in place.

### **2.2.4 Sources of Audit Criteria**

The audit criteria were derived from the following:

- (i) Documents, circulars, orders, instructions and notifications issued by DBT Mission, GoI.
- (ii) Standard Operating Procedures, Handbook on DBT and Guidelines for State DBT Cell issued by DBT Mission.
- (iii) Guidelines of selected Schemes (Old Age Pension Scheme, Pension Scheme to Women in distress, and Uniform Subsidy Scheme of Department of Social Welfare, Department of Women and Child Development and Directorate of Education respectively).
- (iv) Documents, circulars, orders, instructions and notifications etc. issued by the Departments concerned.
- (v) Information Technology Act, 2000.

### **2.2.5 Audit Scope and Methodology**

For the purpose of audit, three out of total 73 DBT schemes, wherein the amount of benefit transfers was highest were selected for test-check. These schemes were -

- (i) Old Age Pension (OAP) Scheme of Department of Social Welfare (DSW);

- (ii) Delhi Pension Scheme for Women in Distress (DPSWD) of Department of Women and Child Development (DWCD); and
- (iii) Uniform Subsidy of Directorate of Education (DoE).

The Performance Audit covered the period from April 2017 to March 2021. Audit involved examination of records, survey of beneficiaries, physical verification and visit of Departments related to the three schemes selected for test-check. Audit also examined the records of Planning Department, GNCTD which is the nodal agency for implementation of DBT in NCT of Delhi. Audit also examined the database of 'e-District' and 'Edudel' portals pertaining to the three schemes using Information and Communication Technology (ICT) tools.

For detailed examination and surveys, 269, 284 and 161 beneficiaries of Uniform Subsidy Scheme, OAP Scheme and DPSWD respectively (out of total 2,73,459 beneficiaries:- 96,118 from Uniform Subsidy, 1,13,061 from OAP and 64,280 from DPSWD of three schemes from the selected Districts), were selected through random sampling method from the data of selected districts<sup>1</sup>. Entry conference was held with the stakeholders on 17 October 2020 to explain the objective, scope, methodology, etc. of audit. Exit conference was also held on 21 December 2021 to discuss the audit observations contained in the report.

### 2.2.6 Brief Introduction to the three selected schemes

The expenditure incurred under OAP Scheme and DPSWD during 2017-18 to 2020-21 were ₹ 4,760.17 crore and ₹ 2,702.69 crore respectively whereas ₹ 724.83 crore was incurred under Uniform Subsidy during 2017-18 to 2019-20. The expenditure on these three schemes constituted 66 per cent (2018-20) of the cumulative expenditure under DBT schemes.

#### i. Old Age Pension Scheme

This scheme is implemented by the Department of Social Welfare (DSW), GNCTD. It prescribes a monthly pension of ₹ 2,000 and ₹ 2,500 effective from 14 February 2017 to the eligible persons who are aged between 60 to 69 years and 70 years and above respectively.

Eligibility criteria for the beneficiaries are:

- Residence of minimum five years in Delhi before the date of application;
- Annual family income<sup>2</sup> of less than ₹ 1,00,000 from all sources;
- The applicant should have a 'single-operated' account in any Bank in NCT of Delhi; and

<sup>1</sup> West B, South-West A and North East Districts in respect of Uniform Subsidy Scheme, South and South-West Districts in respect of OAP Scheme and South and West Districts in respect of DPSWD

<sup>2</sup> Applicant will need to give a self-declaration regarding income

- Must not be receiving any pension/financial assistance from Central Government/ State Government/ other governmental local bodies or any other source for this purpose.

## **ii. Delhi Pension Scheme for Women in Distress**

Delhi Pension Scheme for Women in Distress (DPSWD) is implemented by Department of Women and Child Development (DWCD), GNCTD. This scheme prescribes a monthly pension of ₹ 2,500 effective from 3 March 2017 to a woman above the age of 18 years, who is Widowed, Divorced, Separated, Abandoned, Deserted or Destitute. Other eligibility criteria for DPSWD is the same as that of OAP Scheme except for income. For benefits under DPSWD, the applicant's annual income (instead of annual family income) should be less than ₹ 1,00,000 from all sources.

For both the above schemes, applicant has to submit the application in the prescribed form and scanned copies of supporting documents online at *e-District*<sup>3</sup>. The applicant can submit the form at *e-District* portal on their own or through district offices of the implementing Department. After approval of the application, the pension/financial assistance amount is transferred to the approved beneficiaries through PFMS.

## **iii. Uniform Subsidy Scheme**

GNCT of Delhi adopted Direct Benefit Transfer for payment of Uniform Subsidy Scheme from the academic year 2017-18. All students enrolled in a government or government aided school of Delhi are eligible for uniform subsidy. From 2017-18, the rate of uniform subsidy was ₹ 1100 for students from Nursery to Class V, ₹ 1400 for students from Class VI to VIII and ₹ 1500 for students from Class IX to XII.

The expenditure made under Uniform Subsidy Scheme during the period from 2017-18 to 2019-20, is given in **Table-2.2**. Uniform subsidy was not distributed during the year 2020-21 as schools were not functioning due to Covid pandemic.

---

<sup>3</sup> Web portal of GNCTD for various welfare services

**Table-2.2.: Expenditure under Uniform Subsidy Scheme**

(₹ in crores)			
Year	Government School	Aided School	Total
2017-18	217.97	15.64	233.61
2018-19	226.68	18.52	245.20
2019-20	227.89	18.13	246.02
<b>Total</b>	<b>672.54</b>	<b>52.29</b>	<b>724.83</b>

Source: Demand for grants of GNCTD

On admission/enrolment of a student in a government or aided school, the student details are fed on the module available on the *Edudel* website ([www.edudel.nic.in](http://www.edudel.nic.in)) by the Head of School which automatically create a Student-ID. The student details available on the *Edudel* are extracted in batches and sanction is taken from the competent authority for making payment by the Planning Branch of DoE. Thereafter student details are uploaded to the beneficiary data page of PFMS by the Planning Branch. Before payment is made, beneficiary data is circulated to all the schools through Email/Circular for verification of details. Approval is done in two stages, firstly Maker (Statistical Assistant) upload the beneficiary data to the PFMS and secondly, Checker (Statistical Officer) checks and uploads data for payment.

For detailed verification of DBT payments, 23 Government schools and seven Government aided schools were selected on the basis of maximum disbursement of subsidy paid under each category of Aadhaar based subsidy, ECS based subsidy and total subsidy by picking five *per cent* of schools from each of the three selected Districts.

## **Audit Findings**

### **2.2.7 Planning Department**

#### **2.2.7.1 Shortcomings in Capacity Building**

SOP on DBT issued by the GoI stipulates that that the State DBT Cell shall work in tandem with the Centre and make the process of delivering benefits on the DBT platform more reliable, user-friendly and time-bound. It shall primarily work towards coordinating the implementation of DBT in various schemes. The Cell shall act as a nodal point for all the activities and matters related to DBT in the State.

It was the responsibility of State DBT Cell to impart training and capacity building of state officials so that the schemes could be run effectively.

Audit observed that the State DBT Cell did not conduct any training or organize workshops/seminars to build capacity of the state officials implementing DBT Schemes. User manual/guide for officials implementing DBT was also not prepared.

Further, SOP on DBT stipulates conducting benchmark studies on best practices, based on which, a roadmap was to be developed for incorporating those practices in the state operations. Audit, however, observed that no benchmark studies were conducted and no roadmap was developed by the State DBT Cell for incorporating in the State DBT operations.

In the absence of trainings, benchmark studies and roadmap required for smooth and successful implementation of DBT, officials implementing DBT schemes were not in a position to manage DBT Scheme effectively. This resulted in vital information of the beneficiaries remaining uncaptured; ineligible beneficiaries getting benefit of schemes; duplication of beneficiaries etc. These are discussed in the following paragraphs:

#### **2.2.7.2 Weak grievance redressal mechanism**

As per SOP for implementation of DBT, the State DBT cell was to constitute dedicated bodies at different layers to deal with complaints and grievances of beneficiaries pertaining to various issues like delays in receiving subsidy amount in the bank account of beneficiaries, incorrect or delayed feedback, incorrect set of entitlements received by the end beneficiary, etc., in a fair and timely manner.

Audit observed that the DBT Cell did not establish any mechanism for redressal of grievances from the beneficiaries/applicants. Further, weak grievance redressal mechanism was observed in all the three selected schemes as -

- (i) Delhi Pension Scheme for Women in Distress, DWCD - 1,475 grievances were received in six months (October 2020 to March 2021) after constitution of Grievance Redressal Cell (GRC). Out of these 1,475 grievances, 665 grievances i.e., 45 *per cent* remained unresolved as of 16 April 2021. It was further observed that as against the timeline of three days for resolution of grievances, 170 grievances remained unresolved even after more than 100 days.
- (ii) Old Age Pension Scheme, DSW – A dedicated Grievance Redressal Cell was not established. 1,345 grievances were received via Public Grievance Management System (PGMS) and Lieutenant Governor (LG) Listening<sup>4</sup> from April 2017 to December 2020. Out of these, 1,331 grievances (99 *per cent*) remained unclosed.
- (iii) Uniform Subsidy, DoE - No dedicated grievance redressal mechanism was in existence in DoE for dealing with DBT issues. All kinds of grievances related to uniform subsidy were addressed at Head of School level. In the absence of a unified grievance redressal mechanism as per SOP of DBT, DoE could not provide records

---

<sup>4</sup> LG's Listening post is a facility provided by LG's office through which general public can register complaints through telephone, website or letters.

relating to the details of complaints received, resolved and action taken at school/district/Headquarters level. During audit survey of 256 students, three students responded that they had complained to the school authorities on non-receipt of subsidy but the complaints were not resolved.

### **2.2.7.3 Delay in constitution of DBT Advisory Board**

As per guidelines issued by DBT Mission, GoI, a DBT Advisory Board has to be constituted by the State to provide the Cell's executive body a holistic, well-rounded advisory and consulting inputs. The Board was to meet once in a quarter or in any other regular interval, as deemed fit.

Audit noted that DBT Advisory Board of GNCTD comprising 23 members of different Departments of GNCTD under the Chairmanship of Chief Secretary, GNCTD was constituted on 8 February 2021 i.e., after eight years of launch of DBT. As of July 2021, no meeting was held by Advisory Board. Resultantly, the execution of DBT in the State was devoid of expert advice and consult inputs which the Board would have provided.

## **2.2.8 Delhi Pension Scheme for Women in Distress**

### **2.2.8.1 Lackadaisical approach towards dissemination of information about the scheme among potential beneficiaries**

One of the main objectives of DBT is to ensure accurate targeting of the beneficiaries. As per the SOP of DBT, identification of beneficiaries for respective schemes is the responsibility of the department concerned. In order to ensure maximum coverage, the foremost requirement is that adequate awareness generation is done among the potential beneficiaries, so that they may apply for the benefits.

Audit, however, observed that DWCD neither advertised scheme details of DPSWD through print/radio/digital means nor organized any camps, wherein the potential beneficiaries could be informed of the benefits. The citizen charter of DWCD was also deficient as the requisite details regarding service standards and remedies available, were not explained. Further, the Government did not undertake any exercise to assess the actual number of eligible residents.

Thus, the Government displayed a lackadaisical approach towards dissemination of information about the scheme among potential beneficiaries.

DWCD stated (December 2021) that to ensure maximum coverage, camps were organized and banners/posters were displayed in District Offices. Helpdesk has also been established at Head Office. The reply is not tenable as coverage was limited to the people visiting these offices.

### **2.2.8.2 Details of legacy beneficiaries not migrated to SMS (e-District portal) resulting in irregular payment of pension**

Prior to the introduction of online applications on *e-District* portal under DBT for DPSWD (from 12 December 2018), offline (physical) applications were submitted by the beneficiaries. Audit, observed that as of March 2021, out of total 3.32 lakh beneficiaries under DPSWD, details of 2.67 lakh (80 *per cent*) offline/legacy beneficiaries were not migrated to *e-District* portal but maintained in MS-ACCESS database which was used for release of payment to their Bank Accounts through PFMS. It was imperative for the Government to migrate these legacy cases to *e-District* portal so that payment of pension to all the beneficiaries are made after processing through SMS. Thus, digitization of details of 80 *per cent* of the beneficiaries of 'Delhi Pension Scheme for Women in Distress' has not been done by the Government.

Not migrating legacy cases to *e-District* deprived the Government of an automated system to cross-check the legacy/offline cases with online applications. During examination of records in two selected districts (South and West Districts), audit observed that 45 beneficiaries, who were receiving pension on the basis of physical application, applied for pension online also. They were sanctioned pension, on the basis of online application also, along with arrears for the period during which the applications were pending. This duplication was there due to not migrating offline (legacy) beneficiaries' details to *e-District* portal. Payment of pension to these 45 beneficiaries on the basis of both online and offline applications, along with arrears (online), resulted in irregular payment of pension amounting to ₹ 8.08 lakh. Considering the huge number of offline beneficiaries, the possibility of making irregular double payments to a considerable number of beneficiaries cannot be ruled out. The Government needs to validate and migrate the offline cases to *e-District* at the earliest so that such irregularities could be avoided.

Audit also verified the details of 126 selected offline (legacy) cases maintained in MS-ACCESS by the Department but supporting physical records (applications and supporting documents) in respect of 109 were not provided/traceable at the test-checked district offices. Thus, the genuineness of these legacy cases could not be verified and is doubtful.

DWCD stated (December 2021) that the beneficiary data has been ported on NSAP-PPS Portal and is being tested prior to roll out.

### **2.2.8.3 Unreliable details of beneficiaries due to inadequate input validation in SMS**

Input controls are the application controls which seek to minimize the risk of incorrect data entry by making validation checks, duplicate checks and other related controls. The accuracy of data input to a system can be controlled by imposing a number of computerised validity checks on the data presented to

the system. This provides the earliest opportunities to detect and correct possible mistakes.

Delhi Pension Scheme for Women in Distress is managed through *e-District* portal. During analysis of data, it was found that there was a lack of input validation in *e-District* portal. This facilitated pension to ineligible beneficiaries as discussed below:

- i. One of the eligibility criteria for DPSWD is ‘the applicant should have a ‘singly-operated’ account in any Bank in NCT of Delhi’. This can be verified by validation of IFSC entered in the application. Audit, however, observed 177 DPSWD cases in *e-District* data, where pension was credited to bank accounts outside NCT of Delhi, indicating that validation check for this was not put in place.

DWCD stated (December 2021) that it has no control over credit to account outside Delhi as Aadhaar based payment system remits credits automatically to the last account mapped with Aadhaar.

The reply is not tenable, since it is the responsibility of DWCD to ensure that payments are made to bank accounts in Delhi.

- ii. One of the eligibility criteria for DPSWD is ‘Residence of minimum five years in Delhi before the date of application’. Accordingly, *e-District* portal requires an applicant to inform whether he/she fulfills this criterion. Audit, however, observed 306 cases wherein the application was accepted and case processed despite the fact that applicant selected ‘No’ against fulfilment of residence criterion.

The matter was referred to the Government, reply was awaited (May 2022).

- iii. Audit observed two cases of pension for women in distress wherein a future date was submitted as the date of death of husband. This is due to lack or failure of validation checks, as a future date for ‘date of husband’s death’ should not be accepted while submitting the application.

In response, the Department of Women and Child Development stated (August 2021) that in one case, the date of death of husband was actually earlier than the application for pension which has now been rectified. In second case the pension has been stopped and the process for recovery of pension and to take penal action against the beneficiary has been initiated. However, the reply is silent regarding action taken to introduce validation checks for input data.

#### **2.2.8.4 No end-to-end digitization of the process as absence of linkage between SMS and PFMS**

One of the objectives of the DBT was end-to-end digitization of the process i.e., from the date of applying for benefits under the scheme to disbursement of benefits. As per Standard Operating Procedure for DBT payments, after satisfactory completion of payment conditionality, the implementing department will generate payment file instructions either in SMS or in PFMS directly and push the payment file on PFMS (in case of former) and authorize the same for payment processing.

Audit noted that in DPSWD, the payment file instructions are not being generated in SMS or PFMS. Instead, the details of newly approved online cases are imported from *e-District* to an Excel Sheet every month and merged with existing cases (offline as well as online) in MS-ACCESS (Master database). Thereafter, a combined list of beneficiaries to whom payment is to be released is extracted from the master database in Excel format which is then uploaded to PFMS portal for making payment.

The procedure adopted by DWCD was not in consonance with the spirit of DBT framework whereby transfer of benefits should be done directly to the beneficiaries through SMS/PFMS without any manual intervention. In audit's opinion, once the upto-date list of eligible beneficiaries, both offline and online, is maintained in the SMS, the payment file instructions should automatically be generated and pushed to PFMS for making payment. Manual processing of beneficiary data and uploading of beneficiary data for payment to PFMS is fraught with risks, as beneficiary details can be easily modified/created/deleted in an Excel sheet.

The matter was referred to the Government, reply was awaited (May 2022).

#### **2.2.8.5 Multiple registrations of beneficiaries in PFMS**

The SOP for DBT requires registration of beneficiary in PFMS after successful validation of bank account/postal account or validation of Aadhaar number on National Payment Corporation of India Aadhaar Mapper. After successful registration on PFMS, it assigns a unique beneficiary code to each beneficiary. This is a one-time process except for cases involving registration failure or updation of beneficiary records in SMS.

Audit observed that as of March 2021, there were 5,52,055 beneficiaries registered on PFMS. Out of these, 4,83,784 beneficiaries were registered on PFMS using 2,41,835 Aadhaar numbers more than once. Thus, the authentication process to ensure uniqueness of each beneficiary before getting them registered on PFMS was unreliable.

### **2.2.8.6 Irregularities in sanction of pension**

After an applicant submits the form and supporting documents for DPSWD through *e-District* portal, the Department scrutinizes the applications which includes verification of documents submitted by the applicants. Audit observed various issues in sanction of pension as discussed in the succeeding paragraphs.

#### **(i) Delay in sanction of pension**

The applications for DPSWD were required to be processed for sanction by the District Officer within 45 days from the date of application. Audit, however, observed that the pension was sanctioned after 45 days of receipt of application in 32,578 test-checked cases (54.17 *per cent*) in DWCD. The delay ranged up to 22 months. The delay in sanction of pension is against the core objective of the DBT Scheme.

#### **(ii) Sanction of pension without verification of documents**

There was no Standard Operating Procedure (SOP) defined for verification of the documents submitted by applicants to establish their eligibility e.g., there was no SOP to verify the husband's death certificate, Voter ID etc. with the issuing Department.

Audit requisitioned application forms and supporting documents of 161 beneficiaries of DPSWD, out of which only 52 application forms (offline and online cases) were provided to audit. In nine out of these 52 cases, husband's death certificate was not found on issuer department's website. During beneficiary survey of these 161 beneficiaries, it was found that husband of four beneficiaries were alive. Thus, it is evident that Department was not verifying the documents submitted by the applicant diligently, resulting in sanction of pension to ineligible applicants. The possibility of existence of many ineligible beneficiaries in the absence of verification of documents cannot be ruled out. This may be examined in detail; ineligible beneficiaries may be weeded out and responsibility may be fixed for the same.

DWCD accepted the fact and stated (December 2021) that it has requested all MCsD to share the data of death with NIC for verification of death certificates through digital mode.

### **2.2.8.7 Delay in transfer of payments to beneficiaries' account**

In DPSWD, monthly pension payments are to be transferred to the beneficiary's account. As per the timeline prescribed (27 September 2019) for various stages of the payment process starting from capturing of eligible beneficiaries' data from *e-District* portal to uploading of payment data file to PFMS portal, the pension should be credited to bank accounts of eligible beneficiaries by the 20<sup>th</sup> of the month.

During test-check of records, audit observed that pension for the months from February 2019 to April 2019 was credited into beneficiaries' bank accounts on 22 May 2019. Thus, there was delay in transfer of payments to the accounts of the beneficiaries.

DWCD accepted the facts and stated (December 2021) that delay was due to manual process of payment as per legacy data, application received online through *e-District* and the correction cases.

#### **2.2.8.8 Pension being paid to a large number of ineligible beneficiaries identified by DWCD itself**

Eligibility of the beneficiaries need to be assessed periodically as the status of beneficiary may change over time due to various reasons. As per Rule 12 (v) of the Delhi Pension Scheme for Women in Distress Rules, 2010, review and evaluation of the scheme as well as verification of the beneficiaries are to be conducted every three years. Audit noted that in a survey of 2,30,412 beneficiaries conducted (2018-19) by the Department, 43,516 beneficiaries did not fulfil the eligibility criteria on various grounds such as re-marriages, left area, duplicate pension, etc. However, no corrective action was taken by the Department to stop payment of pension and effect recoveries from these beneficiaries' found ineligible by the Department itself. This issue needs critical scrutiny at the highest level in GNCTD and remedial measures must be taken to stop irregular payment of pension. Considering the large number of ineligible beneficiaries, responsibility for the lapse needs to be fixed.

During a survey of 161 selected cases, conducted by Audit, two cases were observed where the beneficiary had shifted out of Delhi rendering these beneficiaries ineligible for pension and in one case, the beneficiary had died. However, pension was being paid in these cases due to absence of a mechanism for periodical re-assessment of eligibility.

DWCD stated (December 2021) that it has initiated a proposal for assessment of the eligibility of beneficiaries.

#### **2.2.8.9 Irregular disbursement of financial assistance to female beneficiaries under both OAP and DPSWD**

In the DBT schemes, beneficiaries' database is digitized and thus, can be easily analysed at State level to identify the beneficiaries availing benefits under multiple schemes.

The eligibility criteria of 'Old Age Pension Scheme' and 'Delhi Pension Scheme for Women in Distress' prohibits beneficiaries from receiving any pension from other Central/State/ULBs, etc., schemes for this purpose.

Audit compared the database of two schemes for the year 2020-21 and observed that 1,423 beneficiaries received pension under both the schemes. These 1,423 beneficiaries received ₹ 4.05 crore and ₹ 3.72 crore under 'Delhi Pension Scheme for Women in Distress' and 'Old Age Pension Scheme' respectively. However, Government has not devised any mechanism to compare the beneficiaries under various DBT schemes under the Government in order to identify multiple payments. This is a serious lapse and corrective action must be taken at the earliest. Based on a detailed examination of the issue responsibility may also be fixed on the concerned functionary.

DWCD stated (December 2021) that the matter would be sorted out when beneficiaries' data of both Departments (DSW and DWCD) is uploaded to NSAP portal. It has uploaded beneficiaries' data to NSAP portal and the matter is under submission with Planning Department, GNCTD.

### **2.2.9 Old Age Pension Scheme**

#### **2.2.9.1 Lackadaisical approach towards dissemination of information about the scheme among potential beneficiaries**

One of the main objectives of DBT is to ensure accurate targeting of the beneficiaries. As per the Standard Operating Procedure (SOP) of DBT, identification of beneficiaries for respective schemes is the responsibility of the department concerned. In order to ensure maximum coverage, it is the foremost requirement that adequate awareness generation is done among the potential beneficiaries, so that they may apply for the benefits.

However, it was observed that:

- (i) DSW did not undertake any exercise to assess the actual number of eligible residents for OAP scheme. Moreover, it has fixed a 'cap' to limit the total number of beneficiaries who are to be covered under this scheme (at present it is 5.30 Lakh), the basis of which was not provided to audit. This limit has been further divided into quotas for each Assembly Constituency, in the ratio of the existing number of beneficiaries of the scheme. This Assembly Constituency quota system disallows fresh applicants, who are otherwise eligible to avail the benefits of the scheme, if the quota of their constituency is full, even though overall vacancies exist. The cap on the total number of beneficiaries goes against the spirit of the Scheme which was to provide pension to all the eligible old persons in Delhi.
- (ii) As per the Citizen's Charters Handbook of Department of Administrative Reforms and Public Grievances, Ministry of Personnel, Public Grievances and Pension, in the Citizen Charter, a mention should be made against each service, the entitlement of the user; service standards and remedies available to the user in case of the non-adherence to standards. It was observed in audit that in the 'Citizen

Charter' link available in the website of DSW, details of various Financial Assistance Schemes operated by DSW were given. In respect of OAPS, it was mentioned that 'normally, the applications were to be disposed-off within 45 days of receipt of applications, unless circumstances dictate otherwise'. The time taken by DSW in sanctioning of pension has been examined and discussed in the para titled 'Irregularities in sanction of pension'. The Charter does not mention about redressal mechanism available to the applicants. Thus, the 'Citizen Charter' is deficient with regard to essential and useful information for empowering citizens to get benefit timely.

- (iii) It was also observed that Old Age Pension Scheme was not advertised widely through print/radio/digital means nor any camps were organized, wherein the potential beneficiaries may be informed of the benefits and applications can be submitted.

Thus, the Government not only displayed lackadaisical approach towards dissemination of information about the schemes among potential beneficiaries, but also restricted the number of beneficiaries in an unscientific manner, as no surveys were conducted to identify the actual number of eligible applicants.

In respect of the issue of ceiling in the number of total beneficiaries, DSW replied (December 2021) that it is a policy decision and the observations of Audit are duly noted for factoring at policy level in future to the extent possible. As regards publicizing the scheme, DSW stated that, due to a ceiling prescribed for the scheme and unavailability of vacancies during 2018-19 to 2020-21, the scheme was not advertised in print/radio. The reply is not acceptable since number of beneficiaries can go below the cap whenever a beneficiary become ineligible due to death, shifting of residence etc. and new beneficiaries can be covered under the scheme against these vacancies.

#### **2.2.9.2 Details of legacy beneficiaries not migrated to SMS (e-District portal)**

Prior to the introduction of online applications on *e-District* portal under DBT for OAP (from 7 January 2017), offline (physical) applications were submitted by the beneficiaries. Audit, observed that out of total 5.69 lakh beneficiaries as of March 2021, details of 4.52 lakh (79 per cent) offline/legacy beneficiaries were not migrated to *e-District* portal but maintained in MS-ACCESS database which was used for release of payment to their Bank Accounts through PFMS. It was imperative for Government to migrate these legacy cases to *e-District* portal so that payment of pension to all the beneficiaries are made after processing through SMS. Thus, the digitization of details of 79 per cent of the beneficiaries of 'Old Age Pension' has not been done by the Government.

Not migrating the legacy cases to *e-District* also deprived the Government of an automated system to cross-check the legacy/offline cases with online applications. Government needs to validate and migrate the offline cases to *e-District* at the earliest.

Audit also called for the records of the offline applications (legacy cases) whose details were maintained in the MS-ACCESS database by the DSW. However, the selected district offices have replied that the supporting physical records (applications and supporting documents) of 246 out of 247 selected offline beneficiaries (114 from South District and 133 from Southwest District) were not traceable. Thus, the genuineness of such legacy cases could not be verified by Audit and is suspect.

DSW replied (December 2021) that due to technical issues, the integration of legacy data could not be achieved. The Department further intimated that now it has integrated legacy data and that of *e-District* portal with NSAP-PPS portal, further linking it with PFMS, thus enabling end-to-end digitization of the scheme.

### **2.2.9.3 Unreliable details of beneficiaries due to inadequate input validation in SMS**

In the SMS, through which details of beneficiaries are filled, adequate input validation checks should be incorporated. Validation of inputs is an initial check and an important feature for optimal/satisfactory interaction with the user; by detecting invalid data at the time of filling the application itself, so that the applicant/department official can fix it right away. If it gets to the server and is then rejected at the time of processing or payment, it would cause undue delay in providing benefits to the beneficiaries. Lack of input validation and erroneous application processing may also result in approval of ineligible beneficiaries and thereby, irregular payments.

The Old Age Pension Scheme is managed through *e-District* portal. During analysis of beneficiary data, it was found that there was lack of input validation in *e-District* portal as discussed below:

- (i) Bank Account details (Account number and IFSC) are one of the most critical entries to be filled in the application for OAP, as incorrect Account details would lead to a failed transaction and denial/delay in transfer of benefits to the beneficiary. IFSC (Indian Financial System Code) represents an alpha-numeric code that uniquely identifies a bank branch participating in any RBI regulated funds transfer system. Audit observed that there was no validation control for IFSC code in the beneficiary data compiled by the Department from *e-District* and legacy data and there were 7,518 cases in which the IFSC code of the beneficiaries were found incomplete.

- (ii) One of the eligibility criteria for the OAP is ‘the applicant should have a ‘singly-operated’ account in any Bank in NCT of Delhi’. The requirement of bank account in NCT of Delhi can be verified by validation of IFSC Code entered in the application. Audit, however, observed 559 OAP cases in *e-District* data where the pension was credited to bank accounts outside NCT of Delhi, indicating that the said validation was not incorporated in the portal.

The DSW replied (December 2021) that all IFSC codes are validated on *e-District* portal prior to being mapped. The reply is silent about the validation of IFSC code of legacy/offline cases. The reply is not acceptable as the validation of IFSC codes should have been done for all beneficiaries including legacy beneficiaries who had submitted their details in physical forms.

In respect of 559 cases where pension was being credited to the bank accounts located outside Delhi, the Department replied (December 2021) that it is the feature of Aadhaar Enabled Payment System (AEPS) that DBT remittances are automatically credited to the last account mapped with Aadhaar on NPCI. Therefore, while all beneficiaries submit their accounts in Delhi, at the time of payment, the Department has no control over the credit to accounts outside Delhi.

The reply is not tenable as it is the responsibility of the implementing Department to ensure that the eligibility criteria of the scheme is fully met by the beneficiaries.

#### **2.2.9.4 No end-to-end digitization of the process as absence of linkage between SMS and PFMS**

As already pointed out in case of DPSWD, in OAP scheme also, the procedure prescribed under the SOP of DBT was not being followed and the details of newly approved online cases were imported from *e-District* to an Excel Sheet every month and merged with offline cases in MS-Access (Master database). Thereafter, a combined list of beneficiaries to whom payment was to be released was extracted from the master database in excel format which is uploaded onto PMFS portal for making payment. Transfer of data through excel sheets is fraught with risks, as the beneficiary details can be easily modified/created/deleted from an Excel sheet without an audit trail. Ideally, the legacy data of beneficiaries should be migrated to the SMS and the SMS should be integrated with PFMS for transferring payment related data directly without manual intervention.

#### **2.2.9.5 Multiple registration of beneficiaries in PFMS**

The SOP for DBT requires identification as well as authentication of the beneficiaries by the implementing department using the bio-metric authentication of UIDAI to establish identity of the individual. Audit observed

that Aadhaar authentication process has not been followed in OAP Scheme by GNCTD.

After successful registration on PFMS, it assigns a unique beneficiary code to each beneficiary. Correct beneficiary IDs are necessary in order to identify the beneficiaries in beneficiary data and PFMS without which probability of payment to fake beneficiaries or multiple payment to the same beneficiary cannot be ruled out.

As of March 2021, there were 7,68,522 beneficiaries found registered on PFMS Portal under OAP scheme. However, the master database contained only 5,69,488 registered beneficiaries indicating multiple registration of same beneficiaries in PFMS. It was noted that in OAP scheme, 4,53,052 beneficiaries were found registered in PFMS using 2,15,560 distinct Aadhaar numbers more than once indicating unreliable authentication process to ensure uniqueness of each beneficiary before getting them registered on PFMS.

The Department replied (December 2021) that after transitioning to PFMS portal for payment to beneficiaries, the beneficiary data was ported on different codes (Central/State codes) at different times. Further, the beneficiary details are validated for both AEPS as well as NEFT payment due to which two codes are generated for the beneficiary. However, only one code is used for remittances, preferably the Aadhaar based code. The registration IDs generated on different codes are not deleted as the payment status/previous transactions can be searched only through specific PFMS code. The reply is not tenable because there are 5.69 lakh beneficiaries in the master database maintained by the Department and in PFMS, 2 Lakh additional beneficiaries were found registered which is a significant number. The Department should have taken steps to avoid multiple registration of same beneficiary by clearly identifying the beneficiaries based on their mode of payment of pension (AEPS or NEFT).

#### **2.2.9.6 Irregularities in sanction of pension**

After an applicant submits the form and supporting documents for Old Age Pension Scheme through *e-District* portal, the Department scrutinizes the application which includes verification of documents submitted by the applicant. Audit observed the following issues in sanction of pension.

##### **(i) Delay and arbitrariness in sanction of pension**

The applications for OAP were required to be processed for sanction by the District Officer, Department of Social Welfare within 45 days from the date of application.

However, analysis of beneficiaries' database of *e-District* portal in respect of DSW has revealed the following irregularities in the sanctioning process:

- a. OAP was sanctioned after 45 days in 1,07,373 cases (91 *per cent*). The delay ranged up to more than three years.
- b. 21,537 OAP applicants were sanctioned pension despite having unattended queries or adverse remarks made by the sanctioning authority. There was no information in the database as to whether these queries/remarks were attended to before release of pension.
- c. In 239 rejected cases, the applications were rejected without giving any reason. In eight cases, the applications were pending for approval but rejected without specifying any reason for the same.

The delay in sanction of pension, sanction of pension with unattended objections, and rejections without giving reasons are against the core objective of the DBT Scheme and also depicts arbitrariness in pension sanctioning process. Reply of the DSW was awaited (May 2022).

#### **(ii) Delay in transfer of payments to beneficiaries' account**

In the OAP Scheme, monthly pension payments are to be transferred to the beneficiary's account by the fifth day of the month. In order to ensure timely payments to the beneficiaries, Department of Social Welfare specified that payment files of each month should be uploaded by end of each month so that payment is credited to bank accounts of eligible beneficiaries by fifth day of the next month.

Audit, however, observed from the scrutiny of PFMS data and test check of sanction files that expenditure sanction for any month is generally received in the next month. As a result, payment files pertaining to a particular month are always uploaded in the next month and payments are credited by the end of the next month only. Test check of records revealed that the payments were processed with delay ranging from one to 14 months.

#### **2.2.9.7 Periodical re-assessment of eligibility of the beneficiaries not conducted**

Eligibility of beneficiaries need to be assessed periodically as the status of beneficiary may change over time due to various reasons. Rule 11(iii) of the Old Age Assistance Rules, 2009 stipulates review and evaluation of the scheme as well as verification of the beneficiaries to be conducted every three years. Besides, Rule 5 *ibid* also stipulates test-check of five *per cent* of all beneficiaries through physical verification by the District Social Welfare Officer. Audit, however, observed that these orders were not complied with, as no such review was conducted till date.

During the beneficiary survey conducted by Audit, 16 cases were observed where the beneficiary had died, requiring the payment of pension to be discontinued. However, pension was being paid to the accounts of these beneficiaries due to absence of a mechanism for periodical re-assessment of

eligibility. The result of the few test checked cases indicate that the number of such ineligible cases would be huge in the whole population of existing beneficiaries. This depicts serious omission on the part of the Department as not conducting the requisite periodical physical verification resulted in payment of pension to the beneficiaries who became ineligible due to change in status.

The Department replied (December 2021) that it has initiated a proposal for third party verification of all beneficiaries at their doorstep through biometric authentication.

## 2.2.10 Uniform Subsidy

### 2.2.10.1 Unreliable details of beneficiaries due to inadequate input validation in SMS - *Edudel*

The accuracy of data input to a system can be controlled by imposing a number of computerised validity checks on the data presented to the system. This provides the earliest opportunities to detect and correct possible mistakes. The details of students are fed/uploaded on Student Module of *Edudel* by the IT Assistant/staff of the school. In this regard, audit noted that the Student Module has no inbuilt validation checks for student data entered by Schools. In the absence of proper validation controls, there is scope for entering incomplete or invalid data.

The beneficiary data of students of Government and aided schools for the period 2017-18 to 2020-21 was examined and it was found that there were discrepancies in the beneficiary data which shows lack of input validation in *Edudel* portal, as discussed in the succeeding paragraphs.

#### (i) Incomplete beneficiary data

Audit observed that key fields such as Bank Account number, IFSC, Aadhaar, contact number and name of father/mother were missing in the records of student database of *Edudel* portal. This indicates that there were no inbuilt validation checks as the portal should not have allowed generation of Student ID without these essential details. Number of cases in which details were blank/missing are as given in **Table-2.2.2**.

**Table-2.2.2: Number of cases with missing details**

Year	Total beneficiaries	Blank Bank A/c	Blank Aadhaar	Blank contact no.	Blank father's/ mother's names
2017-18	1752997	26214	35524	177161	Nil
2018-19	1792871	23609	28078	178382	203
2019-20	1796231	34526	31288	187744	205
2020-21	1832377	84247	40068	15598	02

**(ii) Same Bank account numbers against multiple students in the beneficiary data**

As per the guidelines of DBT, a pre-requisite for implementation of DBT is opening of individual bank accounts of beneficiaries as the financial benefit is to be transferred directly to the beneficiary's bank account.

An analysis of beneficiary data revealed that there were 9752, 10662, 12223 and 22270 numbers of student records during the years 2017-18, 2018-19, 2019-20 and 2020-21 respectively without unique bank account numbers, i.e., multiple students were linked to same bank accounts(**Annexure 2.2**). The details of payment against these cases were analysed by Audit and is reported in paragraph 2.2.10.4.

**(iii) Same Aadhaar number against more than one student**

In the beneficiary data for the period 2017-18 to 2019-20, Audit noted six instances where same Aadhaar number was shared by two students each. Student data for the year 2020-21 did not contain full Aadhaar numbers, hence Audit could not ascertain whether Aadhaar number is unique to each student.

**(iv) Same student details in the beneficiary data**

Analysis of student data revealed that there were instances where student's name, father's name, mother's name and student's date of birth were shared by two to three students totaling 2855<sup>5</sup> student records. Also, four students had the same above details. Similarly, in 1094<sup>6</sup> student records, same student name, father's name, mother's name and contact numbers were found repeated two to three times. This may have resulted in same student availing benefit more than once.

**(v) Discrepancies in beneficiary data of selected samples vis-à-vis school records**

Audit attempted to verify the data in respect of 269 selected beneficiaries with school records. However, Audit could verify beneficiary data in respect of only 228 students as the schools did not provide records of remaining selected students. In four cases, Aadhaar numbers mentioned in the beneficiary data did not match with Aadhaar numbers as per school records. In 16 cases, bank account numbers in the beneficiary data did not match with bank account numbers as per the bank passbooks/school records.

It is evident from the above that Edudel did not have adequate input controls and validation checks to eliminate duplicate bank account numbers and Aadhaar numbers and to check blank records while capturing enrolment data. This indicated that the data cleansing exercises were not conducted to eliminate erroneous data entry and giving benefits to ineligible beneficiaries.

---

<sup>5</sup>  $5 \times 3 + 1420 \times 2 = 2855$

<sup>6</sup>  $2 \times 3 + 544 \times 2 = 1094$

This also shows inadequacy of manual checks and controls at the time of verification of records before uploading data at school level.

DoE replied (January 2022) that as per Right to Education Act, admission up to class 8<sup>th</sup> have to be made in the age appropriate class without insisting for any certificate/documents like age, transfer certificate etc. This led to multiple registration across the schools within DoE. However, since DoE was aware of these facts, it should have taken necessary measures to weed out duplicate cases before processing for payment.

### 2.2.10.2 Irregularities in payment of uniform subsidy due to incorrect/incomplete beneficiary data

#### (i) Irregular payment of subsidy amounting to ₹ 42.64 crore

All students studying in a Government or aided schools are eligible to get uniform subsidy through DBT. DoE intimated that the names of all students struck off or to whom School Leaving Certificate has been issued are removed from the enrolment data before uploading for payment to the PFMS. As per beneficiary data of DoE for the years 2017-18 to 2019-20, out of a total 53,42,099 enrolled students, the current status of 4,49,356 students (8 per cent) were shown as 'struck off'. Audit observed that 2,93,493 out of these 4,49,356 students were paid Uniform Subsidy during this period. This resulted in irregular payment of uniform subsidy of ₹ 42.64 crore as per the details given in Table-2.2.3.

**Table-2.2.3: Details of irregular payment of Uniform Subsidy**

Year	Total Enrolment	Number of students left schools during the year	Total number of students who received subsidy	Number of students not studying paid	Amount of uniform subsidy paid to students not on the rolls of schools (₹)
2017-18	1752997	146415	1298512*	84528	122766800
2018-19	1792871	155662	1720794	112777	163680100
2019-20	1796231	147279	1712199	96188	139958400
	<b>5342099</b>	<b>449356</b>	<b>4731505</b>	<b>293493</b>	<b>426405300</b>

\* Does not include payment to 401768 students, which were not processed through DBT but were paid at district/school level.

Audit also noticed that in 938 out of 15,186 cases pertaining to selected 30 schools, payments were made though the name of the students were struck off before the date of payment. 51 students were paid three to six months after their names were struck off, three students were paid six to twelve months after their names were struck off and four students were paid more than one year after their names were struck off from the school rolls. This shows that beneficiary data was not updated timely and DoE did not ensure the correctness of beneficiaries before making payment through PFMS resulting in payment to ineligible beneficiaries. This is a grave irregularity and needs to be investigated by GNCTD and responsibility may be fixed on the functionaries concerned.

DoE replied (January 2022) that enrolment status as on the date of transfer of DBT is taken into account. Students subsequently leave the school so there is no scope of correction and recovery from the student is not feasible.

The reply is incorrect as audit observation is based on the beneficiary data used for processing payment which showed these students as struck off from the school rolls.

**(ii) Eligible beneficiaries left out of the scheme due to inaccurate/incomplete beneficiary data**

Analysis of failed/error payment cases of uniform subsidy scheme of DoE of the students of Government and Government aided schools made through PFMS for the years 2018-19 and 2019-20 revealed that out of 32,86,161 students, 70581 (2.15 *per cent*) could not get the cash subsidy for uniform for the years 2018-20 due to various reasons such as wrong/invalid/incomplete bank account details, duplicate account numbers, Aadhaar not seeded, network failure etc. as per the details in **Annexure 2.3**.

DoE stated (March 2021/January 2022) that failure of payment/error in student data is circulated to all schools for updation/correction of student particulars such as bank accounts details, Aadhaar etc. at school and student level. The failed cases were further considered for payment in the next batch. It was further stated that the onus of furnishing Aadhaar numbers and bank accounts to the school rests on parents/students and as per the admission policy, providing of Aadhaar and bank account details is voluntary. However, DoE organized camps in the schools for opening of bank accounts.

The fact remains that 70581 students did not receive uniform subsidy even after the end of the academic year.

**2.2.10.3 No end-to-end digitization of the process as absence of linkage between Edudel Portal and PFMS**

One of the objectives of the DBT was end-to-end digitization of the process from the date of application for benefits under the scheme to disbursement of benefit. This required that there should not be any manual intervention in the process. However, in Uniform Subsidy scheme, every year, details of more than 16 lakh beneficiaries are uploaded from Edudel to PFMS for payment. Ideally, the SMS should be integrated with PFMS for transferring payment related data directly without manual intervention.

**(i) Multiple registration of beneficiaries in PFMS**

The SOP for DBT requires identification as well as enrolment of the beneficiaries by the implementing department using the bio-metric authentication of UIDAI to establish identity of the individual. However, Aadhaar authentication process has not been followed by the school

authorities before entering data in Edudel. After successful registration of beneficiaries, the beneficiary data is uploaded from *Edudel* to PFMS.

Audit noticed that 1,079 students (2,158 payment cases) were paid uniform subsidy twice through Aadhaar Payment Bridge System using PFMS. In the case of 1,073 students, the bank accounts details were also found the same. In all the cases, name of the students were also found same but with different student ID or NIL student ID. This resulted in irregular/excess payment of ₹15.23 lakh as per details given in **Table-2.2.4**.

**Table-2.2.4: Details of irregular/excess payment of Uniform Subsidy**

Year	Mode of payment	No. of double payment cases	No. of excess payment	Total excess paid amount
2019-20	APBS	1908	102@1100, 374@1400 & 478@1500	1352800
2018-19	APBS	220	23@1100, 64@1400 & 23@1500	149400
2017-18	APBS	30	03@1100, 03@1400 & 09@1500	21000
		<b>2158</b>		<b>1523200</b>

This also confirmed the fact that Aadhaar was not being used as a unique identifier in PFMS due to which same Aadhaar was allowed to be used multiple times to register a beneficiary in PFMS. Department needs to investigate the matter and recover all such irregular payments.

DoE accepted (January 2022) the audit observations and stated that payment of Uniform Subsidy to government and aided school children is done under different scheme names in PFMS and some of the students got admission in both government and aided schools, which was not checked. It further stated that directions will be issued to schools in this regard.

**(ii) Excess payment of subsidy to students against same student ID**

Student ID is the field in the beneficiary data to identify a specific student. As per the DBT guidelines, it was the responsibility of DoE to carryout de-duplication exercise in order to avoid multiple payments to the same student. It was noticed from the payment data that multiple payments were made against the same student ID more than once in the case of 6,115 student IDs (12,232 cases) during the period from 2017-18 to 2019-20. This has resulted in excess payment of ₹ 85.78 lakh as detailed in **Table-2.2.5**.

**Table-2.2.5: Details of excess payment**

Sl. No.	Year	No. of duplicate student ID cases	Through APBS both times	Through NEFT multiple times	APBS once and NEFT once	No. of Excess payment cases	Total excess payment
1	2017-18	74 (37x 2)	74 (37x 2)	--	--	26 @1400 11 @1500	52900
2	2018-19	5416 (2708x2)	3096 (1548x2)	656 (328x2)	1664 (832x2)	243 @1100 1520 @1400 945 @1500	3812800
3	2019-20	6742 (3368x2 + 2x3)	40 (20x2)	6662 (3328x2+2x3)	40 (20x2)	11 @1100 3349 @1400 8 @1500 2 @2800	4712700
<b>Total</b>							<b>85,78,400</b>

DoE should have put manual controls and procedures to ensure that student ID was not repeated in the beneficiary data before initiating PFMS payment. Release of multiple payments in a year against the same student ID needs to be examined by the Government. Corrective action needs to be taken and responsibility to be fixed in the matter.

DoE accepted (January 2022) the audit observations. It stated that payment of uniform subsidy to government and aided school children is done under different scheme names in PFMS and some of the students got admission in both government and aided schools which could not be checked. DoE also stated that directions will be issued to schools in this regard.

#### **2.2.10.4 Beneficiary specific bank account for grant of uniform subsidy not ensured violating DBT guidelines**

As per the guidelines of DBT, pre-requisite for implementation of DBT is opening of individual bank accounts of beneficiaries as the financial benefit is to be transferred directly to the beneficiary's bank account.

(i) Generally, Uniform Subsidy is paid once in a year. In the DBT payments made via NEFT using PFMS, it was observed that there were 22,069 cases (18,165 in 2019-20 and 3,904 in 2018-19) where payments were made more than once to the same bank account with same IFSC code. After excluding cases which have also same student ID and which are mentioned under Para 2.2.10.3(ii), there were duplicate payments to bank accounts in 19537 cases (16264 in 2019-20 and 3273 in 2018-19). This resulted in irregular payment of ₹ 1.40 crore.

(ii) In respect of two aided schools (ID-2127103 and ID-1924118), the payments of Uniform Subsidy for 2018-19 and 2019-20 were released to bank accounts of respective schools in 1032 cases. This is a serious lapse and needs a detailed investigation. This was totally against the spirit of DBT and not DBT at all.

(iii) It was also observed that subsidy in respect of 55 students of a government school (ID-1923019) was paid to a single bank account in the year 2018-19. Similarly, two more bank accounts were credited with subsidy

in respect of 52 and 30 students (students from multiple schools) during the year 2019-20. Details of multiple payment to the same bank account are given in **Annexure 2.4**.

On being pointed out by the Audit, DoE confirmed (January 2022) payment of uniform subsidy of 55 students to a single bank account in school ID-1923019 and intimated that recovery from the parents/students who received the excess payment in respect of 54 other students has been done. DoE further replied that schools with ID-2127103 and 1924118 are run by charitable societies and are providing all amenities like school uniform, books, shoes, food, clothing and boarding etc. free of charge to its students who are orphan/destitute children. Therefore, the uniform subsidy in respect of the students were credited to two bank accounts of the institutes in the case of school ID-2127103 and 1924118 as all expenditure of the students were to be met by the institute.

Reply is not acceptable as it was mandatory to credit the benefit to individual beneficiary bank accounts as per DBT guidelines and in case deviation from this procedure was required and justified, necessary approval should have been taken from the competent authority. However, it is not clear whether such approval was taken.

It indicates that the DoE worked against the spirit of DBT as crediting school account instead of DBT beneficiary grossly violated the scheme guidelines. This also establishes that DoE does not have in-built controls in *Edudel* to prevent multiple payments to the same bank accounts. GNCTD may ascertain the reasons for violation of the scheme guidelines and responsibility may be fixed.

#### 2.2.10.5 Delay in transfer of payments to beneficiaries' account

In the Uniform Subsidy Scheme, subsidy amount is transferred annually. The timeline for transferring the subsidy is April to May of every year except for new admissions. For new admission students, subsidy was to be transferred by the end of September. The details of delay in payment of subsidy is given in **Table-2.2.6**.

**Table-2.2.6: Delay in payment of Uniform Subsidy**

Year	Total no. of payment cases	Period of payments			
		Apr - Jun	Jul -Sep	Oct-Dec	Jan - Mar
2019-20	1712199	716151	840195	128941	26912
2018-19	1720794	1268344	119904	47906	284640
2017-18	1298512 <sup>7</sup>	934463	286341	0	0

It can be seen from the Table 2.2.6 that in 3,32,546 cases (19.32 per cent) pertaining to the year 2018-19 and 1,55,853 cases (9.10 per cent) pertaining to

<sup>7</sup> During the year 2017-18, uniform subsidy to 4,01,768 students involving an amount of ₹ 56.04 crore was not distributed through DBT and hence were not checked during audit

the year 2019-20, payments were made after six months from the start of the academic year. Apart from the above, payment of uniform subsidy to 791 government school students for 2018-19 were made in April 2019 i.e. after the end of the academic year. Undue delay in payment is against the core objective of the DBT Scheme.

### **2.2.11 Conclusion**

There was lack of adequate awareness generation and information dissemination among public about the DBT schemes and Government had not assessed the eligible number of beneficiaries in OAP and DPSWD schemes on its own either. Moreover, Government had capped the number of beneficiaries in OAP scheme, which may deprive eligible beneficiaries of benefits.

Regarding implementation of DBT schemes, details related to legacy (offline) beneficiaries were not migrated to the SMS, i.e., *e-District*. This resulted in beneficiaries getting double benefits. As the Departments failed to provide physical records in respect of legacy beneficiaries, the genuineness of legacy beneficiaries, which accounted for more than 79 per cent of the beneficiaries in OAP and DPSWD schemes could not be verified and is doubtful.

The input validation checks in SMSs were not adequate as several cases of invalid data (e.g., numerical IFSC) were found to be accepted by the systems. Besides this, the SMS (*e-District* and *Edudel*) and payment portal (PFMS) were not integrated, leaving scope for manual intervention and manipulation of the data. Audit observed wide variations between master database of beneficiaries and payment database, such as multiple registration of a beneficiary in PFMS. As a result, ineligible applicants got the benefits of the schemes. As observed in test checked cases, non-digitization of details of beneficiaries resulted in irregular payment of benefits both under OAP Scheme and DPSWD. Disciplinary action should be taken for mismanagement of funds as brought out in irregularities. This being sample findings, the implication on the total amount of irregular payment would be much more which needs investigation by the Government and fixing of responsibility for the grave lapses.

There was lack of an SOP for verification of documents submitted by the applicant in support of eligibility. Also, there was no mechanism for periodical re-assessment of eligibility of a beneficiary due to which beneficiaries becoming ineligible due to marriage, death, receiving benefits under other schemes etc. remained in the system and kept drawing benefits. The Government did not take any corrective action to stop the pension or recover excess payments in spite of their own findings to this effect which shows reluctance and lack of intent to target the genuine needy for these schemes.

Serious irregularities in the implementation of Uniform Subsidy scheme like same bank account number against multiple students, payments of huge amount subsidy to students after being struck off from school rolls, excess payment of subsidy to students against the same student ID, payment of subsidy to school account etc merit special attention of the GNCTD and responsibility for the same may be fixed.

There was no monitoring system in the implementing Departments to address various issues related to delay in processing and subsequent credit of payment to the beneficiaries. There was weak monitoring by the DBT Cell to ensure proper implementation of the schemes at department level and to address grievances of the beneficiaries. The existing grievance redressal system of the implementing Departments was ineffective in dealing with grievances of the beneficiaries. The advantages of DBT remained mostly on paper in GNCTD in the absence of identification of genuine beneficiaries, delays in providing benefits and absence of proper mechanism to address grievances in time.

#### **2.2.12 Recommendations**

The Government should -

- Ensure end to end digitization of DBT process.
- Periodically cleanse the data to weed out ineligible beneficiaries.
- Undertake exercise to assess the actual number of beneficiaries under OAP and DPSWD and create awareness of the schemes so that benefits reach all deserving persons.
- Ensure adequate validation controls built into the software so that mandatory data is system- validated at the input stage itself.
- Develop a proper SOP for verification of documents to check arbitrariness in identification of beneficiaries.
- Take action against false and duplicate claims so that the benefits could reach the most deserving in view of cap on number of claims.
- Strengthen the monitoring system to prevent leakages and to ensure that benefits reach all authentic and eligible beneficiaries.
- Establish dedicated Grievance Redressal Mechanism and fix responsibility for delays in timely crediting of benefits through DBT.
- Implement the DBT scheme in the real sense as envisaged wherein the financial benefit is transferred directly to the beneficiary's bank account without the intermediary agency.

## Department of Home

### 2.3 Blockade of funds of ₹ 4.02 crore and avoidable expenditure of ₹ 70.41 lakh

**Acquisition of a plot of land which did not meet the requirements, by Forensic Science Laboratory, resulted in blockade of funds of ₹ 4.02 crore incurred on purchase of the land and avoidable expenditure of ₹ 70.41 lakh on its ground rent.**

With a view to resolve the high pendency of cases for examination in the Forensic Science Laboratory (FSL), Department of Home, GNCTD requested (April 2013) Delhi Development Authority (DDA) to suggest suitable plots of land measuring 10,000 square meters each in East, South and West Delhi for establishing three Regional Forensic Laboratories. A piece of land measuring 5,425 sqm was allotted (March 2014) by DDA to FSL for setting up of Regional Forensic Science Laboratory. This land was allotted on perpetual lease hold basis at a premium of ₹ 4.02 crore with annual ground rent of ₹10.06 lakh. As per condition of allotment, the building was to be completed within two years of taking possession of the land.

Though the size of the plot was much less than required, FSL took possession (August 2014) of the land. Later, FSL approached (January 2015) DDA for allotment of another plot of land measuring 6467 sqm, adjacent to the already allotted one, citing insufficient size of the plot already allotted. In spite of FSL pursuing the matter of allotment of the additional piece of land through several reminders during April 2015 to May 2016, no response was received from DDA.

In a report placed before the High Court of Delhi in May 2016, it was stated that the FSL Complex at Rohini has enough Floor Area Ratio to accommodate another 12 storey building by replacing existing guest house and surface parking which can accommodate additional labs. Thereafter, the Department decided (January 2017) that the allotted land of 5,425 sqm was not required for FSL anymore and the said land was to be handed over to Public Works Department (PWD), GNCTD for using it for construction of Hospital, School or any other uses. However, no further efforts were made to utilize the land or return the land to the lessor, i.e., DDA. Instead, FSL continued paying ground rent of ₹10.06 lakh annually.

Thus, acquisition of a plot of land which did not have the required size for establishment of a Regional Forensic Laboratory and failure to dispose off the same resulted in blockade of funds of ₹ 4.02 crore for more than seven years. Retention of the plot which was not required also resulted in avoidable expenditure of ₹ 70.41 lakh on account of ground rent paid to DDA. Out of this, expenditure of ₹ 40.24 lakh incurred on ground rent was for 2017-18 to 2020-21, i.e., after deciding that the land was not required.

The matter was referred to the Government in September 2021, reply was awaited (May 2022).

## Irrigation and Flood Control Department

### 2.4 Unfruitful expenditure of ₹ 81.56 lakh

**Failure of Irrigation and Flood Control Department to ensure hindrance free sites before awarding of three works resulted in foreclosure of these works rendering an expenditure of ₹ 81.56 lakh incurred on these works unfruitful.**

Para 4.2 of CPWD Manual Volume-II stipulates that availability of the site should be ensured at the planning and designing stage of the work itself and the preparation of detailed estimates and drawing and design stage should be taken up only after availability of the land is assured. Further, para 3.3(2) provides that the estimates should be sent to the client department after fully ascertaining the necessary site and topographical details, technical feasibility etc. In case site survey is necessary, a small estimate may be sent to the client for the purpose of assessing the suitability and availability of the land for the proposed work. It is the responsibility of the Department to provide hindrance free site before approval of Notice Inviting Tender through prior survey. The Superintending Engineer, IFCD-IV, Irrigation and Flood Control Department (IFCD) had also instructed (April 2016) that, before award of work, the Executive Engineer should ensure that site was free from any encroachment, dispute, court cases and other hindrances etc. to avoid withdrawal/cancellation of award at later stage.

Audit observed that in three works, IFCD did not ensure that the site is free from encroachment before undertaking the construction as mentioned in the succeeding paragraphs.

(i) The construction of 3500 metres (m) boundary wall on left side of Najafgarh Drain<sup>8</sup> was awarded in April 2016 at a tendered cost of ₹ 177.11 lakh. The stipulated date of start and completion was 26 April 2016 and 25 April 2017 respectively. The work was halted after completing only 426 m of wall due to hindrance created by the villagers after completion of excavation work. DJB has constructed boundary wall for a length of 300 m out of 3500 m. The balance 2774 m length of boundary wall could not be constructed as records of IFCD was not updated since 1970 and the land was not demarcated by the Revenue Department. In spite of pursuing the issue with Revenue Department, the demarcation was not carried out and the work was finally foreclosed in November 2017 after incurring an expenditure of ₹ 38.93 lakh.

(ii) The work of the construction of boundary wall covering ridge land from Kh. No. 1012/2 to 1921 of Vasant Kunj Enclave was awarded (March

<sup>8</sup> from Goela outfall to Kakraula Village bridge

2015) at a cost of ₹ 30.37 lakh which was to be completed by 6 August 2015. After execution of 50 *per cent* of the work, the work was held up from 23 November 2015 due to unavailability of demarcated land. Though the land was demarcated in February 2017, the work could not be completed as it required demolishing of some houses which was not possible. The IFCD finally foreclosed the work in December 2017 with effect from 23 November 2015 and the contractor was paid ₹ 17.00 lakh for the completed portion of the work.

(iii) The work of extension of Nasirpur drain on DDA land up to railway line was awarded at a cost of ₹ 33.77 lakh to be completed by 17 June 2014. The contractor commenced the work but the field staff of the Railway Department did not allow the agency to execute the work of the drain as the work was near the railway line. The IFCD finally foreclosed the work (July 2016) with retrospective effect from May 2016. However, by then, contractor had completed 68 *per cent* of the work and was paid ₹ 25.63 lakh (August 2016).

Thus, failure of the IFCD in ensuring encroachment/hindrance free site for the above three works before preparation of NIT and awarding of the works resulted in foreclosure of works leading to unfruitful expenditure of ₹ 81.56 lakh.

IFCD replied (October 2021) that in the first case, the work was halted due to hindrance created by villagers. The reply needs to be viewed in the light of the fact that the records of IFCD were not updated from 1970 and demarcation was required. In the case of construction of boundary wall of ridge land, IFCD stated that the site was demarcated partially due to some portion of land of private house situated on land owned by the Forest Department which was the client department and IFCD had no locus standi in the matter of encroachment. The reply is not acceptable since IFCD did not ensure encumbrance free site before issuing NIT. As regards the work relating to extension of Nasir Pur Drain, it was stated that the Railway Department did not allow the contractor to execute the work though Railway's representatives were present in the technical acceptance committee meeting where the said scheme was cleared. However, minutes of the meeting was not provided in support of the reply in the absence of which it is not clear whether the Railway agreed to the project initially.

## Department of Social Welfare

### 2.5 Compliance Audit on 'Implementation of the Rights of Persons with Disabilities Act, 2016'

#### 2.5.1 Introduction

Article 41 of the Indian Constitution mandates the state, to make effective provisions for securing the right to education, work and public assistance for people affected by disability within the limits of its economic capacity and development. Further, India is a signatory to the United Nations Convention on the Rights of Persons with Disabilities 2006 and ratified the same on 1 October 2007. To give effect to the principles laid down in the said Convention, Government of India (GoI) enacted 'Rights of Persons with Disabilities Act, 2016' (Act) which came into force with effect from 19 April 2017, repealing the earlier 'Persons with Disabilities Act, 1995'. The new Act provides for defining the meaning of disability for the first time and form VI under Rule 18(1) extended the recognized categories of disability from seven to 21<sup>9</sup>. It conferred various rights and entitlements on Persons with Disabilities<sup>10</sup> (PwD). These rights and entitlements include equality and non-discrimination, community life, protection against cruelty and inhuman treatment, access to justice, etc. The Act also mandates Governments to take necessary measures/frame schemes and programmes in social security, health, rehabilitation, recreation, skill development, etc. for effective empowerment and inclusion of PwD. All educational institutions funded by the Government are to provide inclusive education to the children with disabilities. Thereafter, exercising the powers conferred by Section 100(1) of the Act, Rights of PwD Rules, 2017 have been framed (June 2017). The Government of National Capital Territory of Delhi (GNCTD), by exercising powers conferred by Sub-Section (1) of Section 101 of the Act, enacted the Delhi Rights of Persons with Disabilities (DRPwD) Rules, 2018 on 27 December 2018.

As per Census 2011, out of the 121 crore population in India, about 2.68 crore persons had some form of disability, which is 2.21 *per cent* of the total population. In the NCT of Delhi, 1.4 *per cent* (2,34,882) of the total population of 1,67,87,941 had some form of disability.

---

<sup>9</sup> 1. Locomotor Disability, 2. Leprosy Cured Person, 3. Cerebral Palsy, 4. Dwarfism, 5. Muscular Dystrophy, 6. Acid Attack Victims, 7. Blindness, 8. Low-Vision, 9 Deaf, 10. Hard of Hearing, 11. Speech and Language Disability, 12. Intellectual Disability 13. Specific Learning Disabilities, 14. Autism Spectrum Disorder, 15. Mental Illness, 16. Chronic Neurological Condition, 17. Multiple Sclerosis, 18. Parkinson's Disease, 19. Hemophilia, 20. Thalassemia, 21. Sickle Cell Disease.

<sup>10</sup> Persons with Disability means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others.

### **2.5.2 Departments involved in implementation of the Act**

In Delhi, the Department of Social Welfare (DSW), GNCTD is the nodal department for implementation of the Act. The Department is headed by Principal Secretary, who is assisted by Director, Special Director, 12 Deputy Directors, Assistant Director (Planning) and Ten District Social Welfare Officers (DSWO). An independent State Commissioner (Disabilities) (SCPD) coordinates and monitors the programmes and schemes for PwD. SCPD also investigates complaints relating to deprivation of rights of PwD. In addition, the Delhi SC/ST/OBC/Minority/Handicapped Finance and Development Corporation (the Corporation) finances, facilitates and promotes the economic development activities for PwD.

Further, other departments are also responsible for implementation of various provisions of the Act, viz. issuing disability certificate by Health Department (as of March 2021, total number of Disability Certificates issued was 1,83,160), issues in respect of barrier free built environment (Section 40 to 46) by Department of Urban Development and education to students with disabilities by the Directorate of Education, and all the departments/ PSUs/ABs for employment of PwD.

### **2.5.3 Audit Objectives**

The objective of this audit was to assess whether -

- (i) The governance framework as envisaged under the Act, has been set in place and whether appropriate and timely actions were taken by the appropriate authorities in that regard.
- (ii) Adequate measures were taken for identification and certification of persons with all types of disabilities to allow them to enjoy the benefits under this Act;
- (iii) Educational opportunity for PwDs were ensured by the Government.
- (iv) Adequate measures were undertaken to ensure Social Security and Rehabilitation of PwD.

### **2.5.4 Audit Scope and methodology**

The Audit was conducted during April to September 2021 covering the period from April 2017 to March 2021 (four years). To assess the implementation of the provisions of the Act, policies and schemes, Audit selected and examined the records of the DSW Headquarters, office of the State Commissioner (Disabilities), three out of 10 District offices, four out of seven special schools for disabled, four out of six Homes for mentally challenged, four out of five half way/ long stay homes for mentally ill, all four functional hostels for college/ school going visually, speech and hearing impaired students, six NGOs, one training-cum-production center and one Sheltered workshop for differently abled (Male) under the DSW. Records relating to financial

assistance disbursed by Delhi SC/ST/OBC/Minority and Handicapped Finance and Development Corporation Limited were also examined. Details of units selected for examination of records are given in **Table-2.5.1**.

**Table-2.5.1: Details of selected units**

Sl. No.	Name of Unit
1.	Department of Social Welfare (Headquarters)
2.	Office of the State Commissioner for PwD, Mata Sundari Road, Delhi.
3.	DSWO (West), Near Punjab and Sind bank, Tilak nagar, New Delhi-18.
4.	DSWO (North- West- I), NPS Building near Vishram Chowk, Sector-IV, Rohini, Delhi-85.
5.	DSWO (North West-II), NPS Building near Vishram Chowk, Sector-IV, Rohini, Delhi-85.
6.	Government Middle School for the Deaf (N.P.S.D) Vishram Chowk, Sector-4, Rohini, Delhi- 110085.
7.	Govt. Sr. Sec. School for Blind Boys (GSSSB), Sewa Kutir Complex, Kingsway Camp Delhi – 09.
8.	Government Lady Noyce Senior Secondary School for the Deaf & Dumb (G.L.N.S), Delhi Gate, Delhi -110002.
9.	School for Mentally Retarded Children (S.M.R.C), Mayur Vihar, PH-I, Delhi-110091.
10.	Home for Mentally Retarded Persons (Children) (HMRP-C) (for Male), Asha Kiran Complex, Avantika, Sector – 1, Rohini, Delhi-85.
11.	Institute for Severe and Profound Retarded Persons (ISPMR) (for Female), Asha Kiran Complex, Avantika, Sector – 1, Rohini, Delhi-85.
12.	School & Home for Mentally Retarded Persons (SHMRP) (for Female), Asha Kiran Complex, Avantika, Sector – 1, Rohini, Delhi-85.
13.	Asha Deep Homes for Mentally Challenged (for Male), Narela, Delhi.
14.	Nav Kiran I, Halfway/Long-stay Home for Women, Rohini, Sector-3, Delhi – 85
15.	Nav Kiran II Halfway/Longstay Home for Women, Rohini, Sector-3, Delhi – 85.
16.	Nav Chenta Halfway Home for Men, Rohini, Sector-22, Delhi – 85.
17.	New Rachna Halfway Home for Men, Dwarka, Sector-03, Delhi
18.	Hostel for college going Blind students (Boys), Sewa Kutir Complex, Kingsway Camp, GTB Nagar, Delhi -110009
19.	Hostel in Government Sr. Secondary School for the Blind Boys, Sewa Kutir Complex, Kingsway Camp, Delhi-110009
20.	Hostel for Girls in Government Lady Noyce Sr. Secondary School for the Deaf & Dumb, G.L.N.S Complex, Delhi Gate, Delhi -110002
21.	Hostel for Boys in Government Lady Noyce Sr. Secondary School for the Deaf & Dumb, G.L.N.S Complex, Delhi Gate, Delhi -110002
22.	The Blind Relief Association (NGO)
23.	AWWA Asha School (NGO)
24.	Amar Jyoti Charitable Trust (NGO)
25.	The Vinayak Blind Women Welfare Society (NGO)
26.	Aradhana Parents Support Group (Regd.) (NGO)
27.	Masoom Foundation (NGO)
28.	Training-cum-Production Centre, Tilak Nagar, Delhi
29.	Sheltered workshop for Physically Handicapped (Male), Ramesh Nagar, Delhi
30.	Delhi SC/ST/OBC/Minority and handicapped Finance and Development Corporation Limited, Rohini

### 2.5.5 Audit Criteria

Audit criteria was derived from the following sources:

- (i) The Rights of Persons with Disabilities Act, 2016.
- (ii) The Rights of Persons with Disabilities Rules, 2017.
- (iii) Delhi Rights of Persons with Disabilities Rules, 2018.
- (iv) Guidelines of various schemes for welfare of PwD.
- (v) Annual plans, policy guidelines and budget announcements, if any, by the Government.
- (vi) Operational guidelines/modalities of the schemes.
- (vii) General Financial Rules and Receipt and Payments Rules, 1983, Government Accounting Rules, 1990, Budget Manual, directives, circulars, orders, instructions and guidelines issued by the Government/ competent authority from time to time.

## **Audit findings**

### **2.5.6 Poor Governance framework**

#### **2.5.6.1 Delay in notifying Delhi RPwD Rules by the GNCT of Delhi**

Section 101 of the Act provides that the State Government may, subject to the condition of previous publication, by notification, make rules for carrying out the provisions of the Act, not later than six months from the date of commencement of the Act. The Act came into effect on 19 April 2017.

The Social Welfare Department of all State Government/Union Territories were reminded (13 June 2017) by the Ministry of Social Justice and Empowerment, GoI that the State Rules be notified before 19 October 2017. However, DSW, GNCTD notified the rules in this regard only on 27 December 2018 i.e. after a delay of 14 months from due date. This delayed implementation of various provisions of the Act.

In response, DSW stated (October 2021 and January 2022) that the State Rules could be framed after notification conferring powers on the Hon'ble Lieutenant Governor for making rules under this Act. The said notification was issued only on 12 December 2017. Thereafter, the draft rules were notified on 22 May 2018 to invite suggestion and comments from the stakeholders. After due consultative process, the final rules were notified on 27 December 2018.

Reply of the Department is not acceptable as all the due process and formalities could have been completed in advance and the Rules could have been notified upon conferring powers in this regard on the Hon'ble Lieutenant Governor.

#### **2.5.6.2 Delay in constitution of State Advisory Board on Disability**

As per Sections 66 and 71 of the Act, 2016, every State Government was to constitute a State Advisory Board (Board) on disability matters to facilitate

continuous evolution of a comprehensive policy for empowerment of persons with disabilities and full enjoyment of rights. The Board's functions included advising the State Government on policies, programs, legislation and projects with respect to disability, develop a state policy to address issues concerning persons with disabilities, review and coordinate the activities of all departments of the state government and other organizations, etc. The Board was to be under the chairpersonship of Minister in charge of the Department dealing with disability matters and the Minister of State or Deputy Minister as vice-chairperson. Secretaries to the state Government in charge of the various Departments<sup>11</sup>, three Members of Legislative Assembly, five members who are experts in the field of disability and five members to represent the districts, etc. were to be members of the Board.

The Board, once constituted, would have been able to give impetus to implementation of the provisions of the Act with its members being senior officers of the Government and experts in the field of disability. However, it was observed that the proposal for constitution of the Board was initiated only in September 2018 and came into effect from January 2021, i.e., after delay of about four years since commencement of the Act. Delay in constitution of the Board indicated lack of intent and seriousness of the Government in matters relating to PwD.

DSW replied (January 2022) that constitution of the Board was delayed owing to certain changes made at the level of Office of the Hon'ble Minister of Social Welfare and time taken for selection of MLAs as members. It was also stated that the matter was also delayed due to code of conduct imposed during parliament and assembly elections in 2019 and 2020.

The reasons for delay given in the reply does not justify the delay of almost four years in constitution of the Board.

### **2.5.6.3 Undue Delay in designation of certifying medical authority for issuing disability certificates**

As per Section 2 (zc) of the Act, 21 types of disabilities were notified which included 14 new categories of disabilities. Section 57 of the Act provides that, the Government shall designate persons, having requisite qualifications and experience, as certifying authorities, who shall be competent to issue the certificate of disability. As per Section 57(2), the Government shall also notify the jurisdiction within which and the terms and conditions subject to which, the certifying authority shall perform its certification functions.

---

<sup>11</sup> Disability Affairs (DSW), School Education, Literacy and Higher Education, Women and Child Development, Finance, Personnel and Training, Health and Family Welfare, Rural Development, Panchayati Raj, Industrial Policy and Promotion, Labour and Employment, Urban Development, Housing and Urban Poverty Alleviation, Science and Technology, Information Technology, Public Enterprises, Youth Affairs and Sports, Road Transport and any other Department, which the State Government considers necessary.

Audit observed that authorities (various Hospitals) for certification of all 21 types of disabilities were designated only on 2 May 2019 i.e., after a delay of more than two years of the commencement of the Act. This delay in designation of authorities for issuing of disability certificates had delayed extending the benefits of their rights and benefits to eligible PwD.

DSW stated (January 2022) that the Department of Health and Family Welfare had notified medical authorities for all 21 types of disabilities on 2 May 2019, only after notification of DRPwD Rules on 27 December 2018.

The reply confirms the delay and also demonstrates the adverse impact of delay of notification of DRPwD Rules on various aspects of implementation of the Act.

#### **2.5.6.4 Long vacancy of the post of State Commissioner**

Section 79 (1) of the Act, 2016 stipulates that the State Government may, by notification, appoint a State Commissioner for PwD (SCPD) for the purposes of this Act. The Office of the Commissioner for Persons with Disabilities was established as a Statutory Authority under section 60 of the Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1995 which started functioning in Delhi from August 2009.

During audit, it has been noticed that four Commissioners/ State Commissioners were appointed by the GNCT of Delhi from May 2009 (since inception) to June 2021 and the post remained vacant for periods ranging from six to 15 months as given in **Table-2.5.2**.

**Table-2.5.2: Absence of State Commissioner for PwD**

Sl. No.	Period of Vacancy	Period of vacancy in months
1.	27.05.2012 to 02.12.2012	06
2.	03.12.2015 to 16.03.2017	15
3.	01.01.2020 to 27.01.2021	13

Source: Information provided by SCPD

Absence of State Commissioner for long periods deprived the PwD in Delhi of the benefit of an Authority with statutory powers to safeguard their rights and interests.

DSW replied (January 2022) that due care shall be taken to avoid delays in future.

#### **2.5.6.5 Annual reports not laid before the State Legislature**

As per Section 83 of the Act and Rule 50 of DRPwD Rules, 2018, the Commissioner shall prepare and submit an annual report giving full account of its activities during the previous financial year to the State Government and may at any time submit special reports on any matter, which, in its opinion, is of such urgency or importance that it shall not be deferred till submission of the annual report. The State Government shall cause the annual and the special reports to be laid before the State Legislature along with a

memorandum of action taken or proposed to be taken on the recommendation of the Commissioner and the reasons for not accepting the recommendations, if any.

During audit, it was noticed that the State Commissioner (Disabilities) prepared and submitted Annual Reports for 2017-18 and 2018-19 but the DSW did not place these reports in the State Legislature as per details in **Table-2.5.3**.

**Table-2.5.3: Status of Annual Reports**

Sl. No.	Period of Annual Report	Prepared by the State Commissioner office
1.	2017-18	Prepared and sent to DSW
2.	2018-19	Prepared and sent to DSW
3	2019-20	Under process (June 2021)
4	2020-21	Under process (June 2021)

Source: Information provided by SCPD

DSW stated (January 2022) that the reports for the years from 2010-11 to 2017-18 were compiled and sent to the departments concerned for seeking their comments but replies are pending from some departments. It was further stated that after receiving replies, these will be put up for laying before the State Legislature.

Such delays weaken the Legislative oversight over implementation of the Act by the Government.

#### **2.5.6.6 Delay in constitution of District Level Committee**

As per Section 72 of the Act read with Rule 39 of DRPwD Rules, 2018, the State Government was to constitute District-level Committees (DLCs) on disability to advise the district authorities on matters relating to rehabilitation and empowerment of PwD, monitor the implementation of the provisions of the Act and Rules, etc. Audit observed that one DLC (Central District) was constituted in December 2019, i.e. after more than two years of commencement of the Act and nine more were constituted in June-August 2021 after another two years. As of October 2021, DLCs were constituted in 10 out of 11 districts. In South East District, the DLC was yet to be constituted. Delay in constitution of DLCs compromised the ability of DSW to implement the Act properly and efficiently.

DSW stated (January 2022) that after notification of the State RPwD Rules, Divisional Commissioners (Revenue) were requested in June 2021 to constitute DLCs on disability and DLCs have been constituted in all Districts except in District-South East and District Magistrate concerned was being requested to expedite the same.

The reply is not acceptable as there was a delay of more than two years in issuing directions for constitution of DLCs after notification of the Rules.

#### **2.5.6.7 State Fund for Persons with Disabilities (PwD) not constituted**

Section 88 (1) of the Act provides for the constitution of a Fund to be called the State Fund for Persons with Disabilities by a State Government in such manner as may be prescribed by the State Government. Further, Rule 53 of Delhi RPwD Rules, 2018 prescribes that the State Fund shall be utilized for (a) financial assistance in the areas which are not specifically covered under any scheme and programme of the Government of National Capital Territory of Delhi; (b) administrative and other expenses of the Fund, as may be required to be incurred by or under the Act; and (c) such other purposes as may be decided by the governing body constituted for the Fund.

The State Fund for PwD has not been created as of January 2022 even after more than four years of commencement of the Act. This indicates lack of commitment of GNCTD towards the welfare of PwD.

DSW stated (January 2022) that steps have been taken for setting up the State Fund for PwD.

#### **2.5.6.8 Weak Complaint redressal mechanism**

(i) Section 80 (b) of the Act envisages that the State Commissioner shall inquire, suo-moto or otherwise, deprivation of rights of PwD and safeguards available to them in respect of matters for which the State Government is the appropriate Government and take up the matter with appropriate authorities for corrective action. Further Rule 49 (2) of the RPwD Rules, 2018 states that the State Commissioner, on receipt of a complaint, shall refer a copy of the complaint to the opposite party or parties mentioned in the complaint directing to submit their version of the case within a period of 30 days or such extended period not exceeding 15 days as may be granted by the State Commissioner. Rule 49 (8) also states that the State Commissioner shall decide the complaint as far as possible within a period of three months from the date of receipt of notice by the opposite party.

During scrutiny of records in office of the State Commissioner (Disability), the following deficiencies were noticed:

(ii) No separate complaint register was maintained to watch the receipt and disposal of complaints from PwD. All the letters and other communications received including complaints are entered in a single diary register (Receipt/Inward register -consolidated). There was no system to watch the pendency of decision in respect of other complaints. Therefore, the settlement of complaints/ grievances in time could not be verified in audit.

In response, DSW stated (January 2022) that complaint register is being maintained meticulously and also in excel format and every complaint is registered with all the details. It was also stated that a circular has been issued directing all officials dealing with grievances to maintain Assistant Diaries and the same is being maintained by dealing assistants.

The reply is not tenable as during audit, it was observed that only a combined diary register was being maintained and no supporting documents regarding maintenance of separate complaint register was provided with the reply.

(iii) In respect of a system for receiving complaints/grievances from PwD over phone, viz. 24 hour help line number, the office stated that requisition for the same has been made to the Administrative Reforms Department of GNCTD.

Further, as per office order no. 68 dated 25 May 2000 issued by the DSW, the DSWO is the public grievance officer of his/her respective district and shall attend to all public grievances relating to his/her district every Tuesday and Saturday with a report to the Headquarter. During audit, it was noticed that no record of grievance redressal was available in the three selected districts. Thus, GNCTD failed to provide a robust grievance redressal mechanism to PwD.

No reply was received from DSW in this regard.

#### **2.5.6.9 Absence of Social Audit of schemes and programmes concerning Persons with Disabilities**

Section 48 of the Act provides that the appropriate Government shall undertake social audit of all general schemes and programmes involving the persons with disabilities to ensure that the schemes and programmes do not have an adverse impact upon the persons with disabilities.

As per information furnished by DSW, it has not conducted any Social Audit and informed that the matter has been referred to the State Commissioner for PwD. Disability Branch, DSW stated (October 2021) that it will include the component of social audit in the schemes.

DSW stated (January 2022) that newly set-up RTE Branch has been requested to undertake social audit of schemes and programmes concerning persons with disability and component of social audit shall be incorporated in schemes being formulated.

#### **2.5.7 Awareness campaigns and its related activities not conducted**

Section 39 of the Act provides that the Government, in consultation with the State Commissioner, shall conduct, encourage, support or promote awareness campaigns and sensitization programmes to ensure that the rights of the persons with disabilities provided under the Act are protected. Further, rights of PwD were to be included in the curriculum in Universities, colleges and schools.

As per the information/record provided by DSW, it has not conducted any programmes or campaigns to promote values of inclusion, tolerance, empathy and respect for diversity. Similarly, DSW did not take any steps to ensure that the rights of PwD are included in the curriculum in Universities, colleges and

schools except sending letters to the Departments concerned about the provisions in the Act.

DSW stated (January 2022) that International Day for PwD is celebrated since 2015 and people are encouraged to participate in the activities of Homes/Institutions for promoting inclusion and awareness. Further, a workshop was also organized on awareness generation of various stake holders in December 2021.

Reply of the Department is not acceptable as only one workshop was organized and no programme was launched to promote values of inclusion, tolerance, empathy and respect for diversity for the last 4 years. Further, no reply has been given with regard to ensuring inclusion of rights of PwD in the curriculum in Universities, colleges and schools.

### **2.5.8 Inadequate monitoring and inspection of the Institutions and Organizations for the welfare of PwD**

As per office order no.68 dated 25 May 2000 issued by the Department of Social Welfare, the District Social Welfare Officers (DSWOs) shall be the supervisory officers of their respective districts and regular inspections of all the units within their districts shall be their primary responsibility. They are required to conduct inspections themselves and send their reports to Headquarter as follows:

- i) Inspection of Homes/Institutions, once in a month and report to Joint Director (Programme) on prescribed formats.
- ii) Surprise Inspection at night of Homes/Institutions once in a month and report to Joint Director (Programme) in the prescribed formats.

During the scrutiny of records of three selected Districts, it was noticed that during the audit period 2017-21, only nine inspections against 192 required were conducted in West District. No inspection of homes, schools or institutions which deals with intellectually impaired children, speech and hearing impaired students and intellectually impaired persons under their respective jurisdiction, were carried out in two districts (North West I and II) (**Annexure 2.5**). Inadequate monitoring of institutions serving PwD shows Government's laxity towards welfare of PwD.

The Department stated (January 2022) that various inspections/surprise inspections were made but records were not maintained and in future records will be maintained and forwarded to Joint Director for necessary action.

### **2.5.9 Non-observance of mandatory accessibility norms**

Sections 41 to 46 of the Act and orders of the State Commissioner dated 26 November 2019 stipulate that the appropriate Government shall take suitable measures to ensure accessibility of the existing built environment and transport, among other things, under an action plan, within five years from the

date of notification of such Rules (15 June 2022). Further, Rule 20 (1) (a) of the Delhi RPwD Rules 2018 provides that every establishment shall comply with the standards for public buildings as specified in the Harmonised Guidelines and Space Standards for Barrier Free Built Environment for PwD and Elderly Persons issued by GoI in 2016. Deficiencies in implementation of these provisions are discussed in the succeeding paragraphs.

### **2.5.9.1 Inadequate monitoring**

The SCPD had taken suo-moto cognizance of inaccessible built environment in GNCTD for PwD in July 2017 and issued notices to the Urban Development Department, Municipal Corporations of Delhi, Delhi Cantonment Board and Delhi Transport Corporation. Due to lack of response to the notices, SCPD conducted hearings on the issue and a Monitoring Committee was constituted by Urban Development Department to monitor implementation of action plans to ensure accessibility of the existing built environment for PwD under the chairpersonship of Principal Secretary (Urban Development Department). After holding nine hearings during the period from October 2017 to November 2019, SCPD issued various instructions through its final orders on 26 November 2019 in this regard.

As per the above orders, the Chairman of Monitoring committee was to submit consolidated quarterly reports (by 10<sup>th</sup> of the month succeeding each quarter) of all departments/agencies<sup>12</sup> to the SCPD indicating progress made over previous quarter on implementation of action plans and report of the physical checks. However, the Monitoring Committee did not furnish any report to SCPD. The SCPD had also found that 14 institutions for PwD run by DSW and nine schools of Education Department were not fully accessible for PwD<sup>13</sup>. Thus, the efforts of SCPD to make public infrastructure accessible to PwD was undermined by lack of adequate efforts and response from the Government.

DSW, in its reply (January 2022), stated that status of accessibility of buildings is appraised every month through e-Samiksha and progress reports to the Government of India. Further, due to outbreak of COVID-19 pandemic and ban on construction activities during winter months on account of pollution; the progress on retrofitting has been hampered.

Reply of the Department is not satisfactory as no progress reports were made available to audit. Further, COVID lockdown of six months and construction ban of a few months was not sufficient to explain the delay of more than four years in implementing the above provisions of the Act.

---

<sup>12</sup> Urban Development Department, Public Works Department, Corporation, Council, DDA, Police, Transport Department, DUSIB, DTIDCL, DSIIDC, DSIIDC, I&FCD and Education Department

<sup>13</sup> in inspections conducted during 2017-18 to 2020-21

### **2.5.9.2 Accessibility to places of worship not ensured**

SCPD had directed all 11 District Magistrates in May 2018 to take appropriate action to make all the places of worship accessible for PwD and furnish details regarding accessibility of places of worship for PwD and timelines for making the same accessible to PwD. SCPD had also issued two reminders and suo-moto notices to these districts. As per responses received, out of total 2329 religious places in Delhi, only 547 (23.49 *per cent*) were accessible to the PwD. Moreover, out of 11 districts, only two districts had given target dates to make all the religious places under their jurisdiction accessible to PwD. After five hearings on the issue, SCPD ordered (October 2019) to GNCTD to take up this issue with management of religious places concerned and issue appropriate directions to make all religious places accessible to PwD within two to three months. Action taken by the Districts was to be monitored by the Monitoring Committee. From the records of the final hearing, it was observed that in spite of the efforts made by SCPD, no progress was reported by various district authorities from May 2018 to October 2019. No evidence of any action on the orders of SCPD was found in the records of SCPD nor any report of the Monitoring Committee after October 2019. Thus, the GNCTD failed to ensure accessibility to places of worship to PwD.

Reply of the Department was awaited (May 2022).

### **2.5.9.3 Despite huge expenditure, identified buildings not made accessible to PwD**

The Department of Empowerment of Persons with Disabilities (DEPwD), GoI had launched the Accessible India Campaign (AIC) on 3 December 2015 as a nationwide flagship campaign for creating universal accessibility for PwD in Built Environment, Transport System, and information and communication technology ecosystem.

DEPwD had also released ₹ 13.94 crore in the years 2017-19 to DSW for making 19 identified buildings barrier free for PwD by August 2020. Even after incurring an expenditure of ₹10.68 crore by the Public Works Department, GNCTD and Delhi Jal Board, only one building has been made accessible to PwD (July 2021) and work was ongoing in other buildings.

Reply of the Department was awaited (May 2022).

### **2.5.9.4 Websites not made disabled friendly**

Section 42 of the Act envisages that the appropriate Government shall take measures to ensure that all contents available in audio, print and electronic media are in accessible format; persons with disabilities have access to electronic media by providing audio description, sign language interpretation and close captioning; and electronic goods and equipment which are meant for everyday use are available in universal design.

Audit observed that DSW has not taken any measure to implement the above provisions of the Act for the last four years since its enactment (September 2021). It was also noticed that websites of various Departments of GNCTD did not provide audio description, sign language interpretation and close captioning as envisaged under the Act.

Reply of the Department was awaited (May 2022).

### **2.5.10 Persons with Disabilities not identified**

#### **2.5.10.1 No data on population of Persons with Disabilities**

(i) Identification of all the beneficiaries is the first step towards ensuring that all eligible persons are provided the mandated services and benefits under any scheme. It was observed that DSW did not have any data on PwD in Delhi as it did not conduct any survey to enumerate PwD in Delhi. State Advisory Board, in its first meeting (April 2021) had also advised the State Government to conduct the ground survey of PwD. The only data available with the Government was that of Census 2011 which was deficient as it categorized only seven types of disabilities whereas the Act recognises 21 different categories of disabilities. Absence of data on PwD limited the ability of the Government to formulate various schemes and welfare measures for them, estimate the resource requirements and preparation of an action plan.

On being pointed out, the DSW stated (October 2021) that a proposal in this regard is being put up.

(ii) Section 17 of the Act stipulates that the Appropriate Government and the local authorities shall conduct survey of school going children in every five years for identifying children with disabilities, ascertaining their special needs and the extent to which these are being met. The first survey was to be conducted within a period of two years from the date of commencement of the Act i.e., by April 2019. However, the Government has not conducted any such survey to identify school going children with disabilities thereby failing to attend to their special needs.

Further, under Section 25 (2) of the Act, the Government was to take measures and make schemes and programmes to promote healthcare and prevent the occurrence of disabilities. For this purpose, Government was to undertake surveys, investigations and research concerning the cause of occurrence of disabilities and screen all the children at least once in a year for the purpose of identifying ‘at-risk’ cases.

A survey of the State Sample of 76<sup>th</sup> National Sample Survey on ‘Survey of Persons with Disabilities’ was conducted by the Directorate of Economics and Statistics, GNCTD. The survey report came out only in July 2021 and the Government was yet to take any action on the same. Thus, even after four years of commencement of the Act, the Government did not conduct any

exercise to assess the extent of disability. It also did not screen all children for identifying 'at-risk' cases.

DSW replied that GoI has written to Census Commission to include enumeration of PwD in the census and DSW has also asked Chief Electoral Officer and Education Department to share their data of PwD voters/students for undertaking a focused ground level survey of PwDs. The reply indicates that the Department did not take any survey to identify all the PwD in Delhi.

#### **2.5.10.2 Undue delay in implementation of the UDID Scheme of the GoI**

For effective implementation of the Act, GoI launched UDID (Unique Disability ID) Project with the objective of creating a National Database for PwD. Under UDID Project, UDID cards were to be issued to every PwD which will help in tracking the physical and financial progress of benefit delivery. It also creates a National Database of PwD for transparency, online availability of data, prevents duplication of PwD data and effective management of implementation of the Act.

Audit observed that though issuing UDID cards was started in May 2019 in NCT of Delhi, the DSW has issued only 7938 cards till September 2021 against the total disabled population of 2.35 lakh (as per Census 2011). This is an unacceptable situation and needs a thorough examination by GNCTD and responsibility for the same may be fixed for not implementing UDID project which otherwise could have been very useful for PwD.

In reply, DSW stated (January 2022) that UDID cards could be issued only after hospitals eligible to issue disability certificates was finalized by the Department of Health and Family Welfare, GNCTD and all hospitals had been directed to complete the pendency of disability certificates in a time bound manner. However, the delay in finalizing the list of hospitals for issuing disability certificates was also attributable to the Government.

#### **2.5.10.3 Not organising/Short organising of Special Disability Camps and General Disability Camps**

As per Section 39 of the Act, the appropriate Government, in consultation with the State Commissioner, shall conduct, encourage, support, or promote awareness campaigns and sensitisation programmes to ensure that the rights of the persons with disabilities provided under this Act are protected. DSW, under the National Programme for Rehabilitation of Persons with Disabilities Scheme (NPRPD), organizes General Disability Camps where Disability Certificate by authorized hospitals, Identity Card by DC Office, DTC Passes, etc., are issued to disabled persons. It also organizes Special Disability Camps for distribution of Aids and Appliances and services for educational and vocational rehabilitation of PwD.

During audit, the following shortcomings were observed in NPRPD Scheme: -

- (i) During 2017-18, 2018-19 and 2020-21, no General or Special Disability Camps were organized by the Department.
- (ii) In 2019-20, only five General Disability Camps were organized against the target of 12, while no Special Disability Camps were organized.
- (iii) Due to short fall in organizing camps, the Department could not utilise the budget allocation of ₹ 131.00 lakh for the years 2017-21 in full and only ₹ 5.34 lakh of this allocation was utilised.

In response, the Department stated (June 2021 and January 2022) that circular designating Hospitals for issuance of Disability certificates was issued only in May 2019 with respect to the Disability. Therefore, Disability camps could be organized only in 2019-20. Further, only five camps could be organized till February 2020 due to sudden outbreak of COVID-19 pandemic. It was further stated that steps are being taken for organizing 30 UDID camp/General Disability Camp in designated Hospitals for issuance of disability certificate and UDID Cards.

Reply of the Department is not acceptable as delay in designation of hospitals for issue of disability certificate was attributable to the Department and GNCTD and even after designation of hospitals for issuing disability certificate, only five camps were organized till February 2020. Thereafter also, as of January 2022, no camp was organised even after the full COVID-19 unlock.

### **2.5.11 Educational opportunity for PwD not ensured**

#### **2.5.11.1 Abysmal condition prevailing in Special schools for PwD provided by Department of Social Welfare**

There are seven special schools for differently abled students run and managed by DSW, GNCTD. Out of these seven special schools, five were for speech and hearing impaired students, one for visually impaired children (boys) and one for intellectually impaired children. There is no special school for visually impaired girls in NCT of Delhi. Out of these seven special schools, four special schools<sup>14</sup> were selected for detailed audit examination.

Audit noticed that the conditions, facilities, and services provided by the special schools were not satisfactory. Further basic infrastructure capacity of the school building and campus was not fully utilized as discussed in succeeding paragraphs.

<sup>14</sup> Government Lady Noyce Sr. Secondary School for Deaf and Dumb, Delhi Gate, Government Middle School for Deaf and Dumb (NPSD), Rohini, Government Sr. Secondary School for Blind Boys, Sewa Kutir Complex and School for Mentally Retarded Children, Mayur Vihar

(i) **Utilisation of school buildings by other offices**

All the four selected special schools have their own school buildings and campuses. However, it was observed that school buildings were also occupied by various offices of the Department of Social Welfare and Department of Women and Child Development, GNCTD as given in **Table-2.5.4**.

**Table-2.5.4: Details of offices functioning from school buildings**

Sl. No.	Name of School and Address	Other offices in the building	Remarks
1.	Government Lady Noyce Sr. Secondary School for Deaf and Dumb, Delhi Gate,	The Building also accommodates DSW office.	528 students are studying in the school in classes' pre-primary to XII. Due to shortage of class rooms, classes IX to XII were running in one room each in spite of having 96 to 113 students. Besides, there was shortage of space for Library, Science lab, drawing classroom, common room for teachers and staff, etc.
2.	Government Middle School for Deaf and Dumb (NPSD), Rohini	There are four offices functioning from the building viz. two District Social Welfare Offices and offices of Department of Women and Child Development.	Due to presence of other offices, out of 39 rooms in four floors of the building, only 12 rooms on first floor was available for running the school and training of PwD student by an NGO. Due to this, only seven rooms were available for teaching 211 students and 12 classes (four for nursery and eight for classes one to eight) were being accommodated in seven rooms. Therefore, two classes were being conducted simultaneously with at least 35 students in one room. It was also noted that each classroom was actually designed for only ten students.
3.	Government Sr. Secondary School for Blind Boys, Sewa Kutir Complex, Kingsway Camp.	No other offices	Three halls and one room were available for accommodating 131 students for class I to XII. Thus, three to four classes were conducted simultaneously in one room/hall.
4.	School for Mentally Retarded Children, Mayur Vihar (National Primary School for Deaf also functions from the building).	The building also accommodates six offices belonging to the Department of Women and Child Development	Building occupied by six other offices causing shortage of space for the two schools.

Source: Information provided by special school authorities under DSW.

Functioning of other offices in the same building where schools for PwD are running is not conducive to learning and development of these children, besides reduced space for schools. Further, these children are vulnerable in many ways and therefore, their sharing of toilets, drinking water, corridors, staircases, entrance of entire building/ campus, etc., with other office staff and visitors is fraught with the risk of physical and emotional distress to these vulnerable children.

The DSW replied (January 2022) that steps have been taken to shift DSW Headquarter at GLNS complex and other offices operating from school located at Rohini, kalkaji and Mayur Vihar to other locations.

**(ii) School operating from unsafe building**

Government Sr. Secondary School for Blind Boys (GSSSBB), Sewa Kutir was operating from a building which was declared unsafe by Public Works Department, GNCTD in the year 2018. However, the school building was neither strengthened/renovated nor the school shifted to a safe building as of September 2021 and the School was still functioning in the unsafe building which is dangerous for the life of students.

DSW stated (January 2022) that records in this regard is being sought from PWD/GSSSBB and action will be taken by the District Estate Officer as per report of PWD.

**(iii) Absence of regular Principal in schools**

Three out of the four selected schools were to be headed by a Principal having Masters degree with a degree/diploma for teachers of PwD of relevant category from a recognized university with 10 years of teaching experience in a teaching institution for PwD. Audit, however, observed that in Government Lady Noyce Sr. Secondary School for Deaf and Dumb (Lady Noyce School), the post of Principal was lying vacant since 2018-19. In June 2021, Headmaster of a secondary school who did not have the required qualification was given additional charge as Principal (Academic) of the senior secondary school. Similarly, in Sewa Kutir School, the post of the regular Principal was vacant and an official of the Department who was not having adequate qualification was posted as Principal (Academic). It was also observed that there was no provision of post of Principal (Academic) in the Department's manual.

DSW replied (January 2022) that amendment in existing Recruitment Rules is under submission to the Union Public Service Commission for their concurrence and as an interim arrangement, Education Department has been requested to deploy Principals on diverted capacity.

**(iv) Shortage of teaching and other staff in schools**

Audit observed that, in all the four special schools selected for audit, there was acute shortage of teaching and other staff.

- a) Lady Noyce School – The school has 528 students and there were only 29 teachers posted against a sanctioned strength of 79 teachers (shortage of 63 *per cent*) during 2020-21. As regards other staff, only 32 persons were available against a sanctioned strength of 49.
- b) The Government Middle School for Deaf and Dumb, Rohini (Middle School, Rohini) – The school caters to 211 students and there were only eight teachers posted against 20 teachers required (shortage of 60 *per cent*). The school has a sanctioned strength of eight non-teaching

staff but the posts of Aya and Bus attendant have been vacant since 2017-18.

- c) GSSSB – The school has 131 students against a capacity of 100 students whereas there were only 13 teachers (Regular -6, Contractual -4 and Outsourced/Guest -3) available against sanctioned strength of 22 teachers (shortage of 40 *per cent*). Since this is a Sr. Secondary School, availability of specialized teachers for different subjects was important. However, there were no teachers for Maths, Science, Sanskrit, English, Music, Craft and Hindi.
- d) School for Mentally Retarded Children (SMRC), Mayur Vihar has 54 students against the capacity of 50 students. There were sanctioned posts of two TGT teachers and one basic teacher and all the three sanctioned posts were vacant since the year 2017-18. A Guest teacher was working in lieu of the regular basic teacher. There was shortage of other staff also with only one person posted out of sanctioned strength of 9 (during 2020-21). It was also observed that the posts of Peon, Aya, Chowkidar, Cook and Helper have been vacant since 2017-18.

Absence of adequate teaching and other staff is detrimental to proper education of the PwD children in the schools. Apart from limiting their educational development, absence of support staff also creates difficulties in providing basic services to children. Absence of Aya in schools create problems for girl students who may have to depend on lady teachers when any help is needed. Many of these children have special needs. Shortage of staff in the SMRC was also pointed out by the State Commissioner for PwD in the observation report of February 2021, but action was yet to be taken on the same by DSW (September 2021).

DSW stated (January 2022) that requisition has been sent to Delhi Subordinate Services Selection Board to fill up these vacant posts.

**(v) School Management Committee not formed**

In terms of Rule 3 of Delhi Right of Children to Free and Compulsory Education Rules, 2011, a School Management Committee (SMC) with no less than 16 members was to be constituted in every school with 75 *per cent* of the members from amongst parents or guardians of the students. Such Committees in special schools for PwD would go a long way in addressing various difficulties faced by the children. However, it was observed that the Committee was constituted only in one of the selected four special schools (Middle School, Rohini), that too in July 2021.

In reply, DSW stated (January 2022) that SMC has been set up in two schools i.e. Lady Noyce School and SMRC Mayur Vihar and process is underway for setting up SMCs in the remaining schools.

**(vi) Insufficient IT systems and computers**

Three out of four selected schools were having only one computer system each which was not sufficient to make IT systems and technology accessible to PwD students apart from official work. Lady Noyce School had four internet terminals for 528 students. Further, the computer at SMRC was not functioning since long. Hence, PwD students in these three schools had virtually no exposure to skills to access computers or IT systems.

DSW stated (January 2022) that the audit observation has been noted for future compliance.

**(vii) Delay in payment of Uniform and Book subsidy**

Uniform and Book subsidies are paid to speech and hearing impaired students for purchase of books and uniform. Since books and uniform are required at the beginning of the academic year, timely payment of subsidy is important. Audit observed delays in processing and payment of this subsidy to students except in 2018-19. The subsidies for academic year 2017-18 was paid in August 2018 whereas subsidies for the years 2019-20 and 2020-21 were paid only in March 2021. Delay in payment of subsidy defeated the purpose of helping the students in purchasing books and uniform.

DSW, in its reply (January 2022), stated that the delay in payment of subsidy in 2017-18 was due to many students staying outside Delhi and unavailability of their accounts. The delay in 2020-21 was attributed to error in accounts and technical problem in students' data in addition to opening of PFMS account in Bank. The disbursing money was under process in December 2021. The fact remains that the subsidies were not paid in time to any of the students. No reason for delay in payment of subsidy for 2019-20 was given in the reply.

**(viii) Unavailability of safe drinking water and toilets**

Safe drinking water was not available in three out of four test checked schools. Three water purifiers and water coolers were installed in Lady Noyce School, but none of them were functional since opening of school in February 2021. Middle School, Rohini, functioning in the first floor of the building, did not have their own drinking water system and students were compelled to use the water-cooler installed on ground floor of the building. GSSSB also did not have safe drinking water as the purifier system was not functional.

It was also observed in audit that none of the four selected special schools were having disabled friendly toilets available to children.

DSW stated (January 2022) that the audit observation has been noted for future compliance.

**(ix) Dirty and unhygienic school campus**

It was observed that in all the four test checked special schools, the campus was dirty and in unhygienic condition.

In Lady Noyce School campus which accommodates Boys and Girls Hostels also, construction waste and garbage was lying in the premises of the school. There were wild vegetation and bushes around the malba, which was infested with snakes. There were pits in school campus with iron rods protruding out as some construction was abandoned midway. This is a potential hazard for special needs students.

**Picture 1: Wild vegetation and garbage in Lady Noyce School campus**



Middle School, Rohini, campus was found flooded with sewer water during audit which was stated to be due to blockage of sewer in main road. Further, the main entrance of the school building was found blocked by vehicles parked by the employees and outsiders/visitors of six other public offices in the building.

GSSSBB was dirty due to old, discarded mattresses and garbage lying/decomposing inside the School and Hostel campus at several places, giving a bad smell and posing a health hazard. Hostel compound was very dirty, and staircases and walls were dirty with patches of pan and gutkha spits. There were no garbage container/dustbins in the school campus.

SMRC was facing water logging problem on the roof of hall and on playground behind school building making it unhygienic. Several letters were

written by the SMRC to the Public Works Department, GNCTD and to DSW during 2018-19 to 2020-21 but no action was taken to address these issues.

DSW replied (January 2022) that during audit there was heavy rain due to which there were water logging in the area which drained out after the blockage was opened by MCD. However, no reply was given with regard to construction waste, bushes, discarded old mattresses and other wastes lying in the campus.

**(x) Unavailability/short availability of transport facility for PwD students**

As per Section 16 (viii) of the Rights of Persons with Disabilities Act, 2016 all educational institutions funded or recognized by the Government shall provide transportation facilities to the children with disabilities. Out of four selected special schools, GSSSB was fully residential. Lady Noyce School provides transport facility to students of classes up to fifth only and not to students of classes VI to XII to attend the classes. Middle School, Rohini has only one bus for transporting 211 students against a requirement of three buses due to which, transport facility was provided only to primary school students.

In its reply, DSW stated (January 2022) that if the parents of students of Middle School, Rohini approached school for transport facility, process for providing school buses will be initiated. As regards Lady Noyce School, it was stated that the matter has been referred to the competent authority and action will be taken accordingly. Reply is not acceptable as the transport facility was required to be provided by the Department as per the Act.

**(xi) Unavailability of learning aids in schools**

As part of specific measures to be taken by the Government to promote and facilitate inclusive education under Section 17(g) of the Act, the Government was to provide books, other learning materials and appropriate assistive devices to PwD students free of cost up to the age of 18 years. Audit observed that group hearing aid was not functional at Lady Noyce School whereas the equipment was not available in Middle School, Rohini. Further, learning aids and appliances for imparting effective education was not available in GSSSB Complex.

DSW stated (January 2022) that the observation has been noted for compliance.

**(xii) Overcrowding of Schools**

There was overcrowding of children in three out of four test checked special schools. In SMRC, the occupancy ranged between 54 and 65 against a capacity of 50 during the years 2017-18 to 2020-21 and therefore, they did not invite applications for fresh admissions of children during this period. It was

stated by the School that, even then, those who came to school for admission were considered on merit, thus all PwD students were not admitted for lack of space.

GSSSB was having 121 to 153 students against a capacity of 100 during the years 2017-18 to 2020-21. Similarly, in Middle School, Rohini, the occupancy ranged between 211 and 236 against a capacity of 180 during the said period.

Thus, the above schools were not having enough capacity to cater to all the PwDs needing education.

As regards SMRC, it was stated by DSW (January 2022) that the observation has been noted for future compliance. In Sewa Kutir School, it has been stated that the school and hostel have now been separated to create more capacity.

**(xiii) Special Educators for PwD not appointed by Department of Education**

Section 16 of the Act, provides that all educational institutions funded or recognized by the Government shall provide inclusive education to the children with disabilities. The Directorate of Education (DoE), GNCTD, vide its Order dated 4 June 2018, directed Heads of Schools of the Government and Government aided schools to ensure that Special Education Teachers (SETs) are engaged in work related to inclusive education. High Court of Delhi in respect of WP(C) No. 6771/2008, had also directed (16 September 2009) the Schools to ensure availability of two Special Educators in each School of Delhi within six months.

The DoE was requested to provide the total number of schools under them and number of SETs posted in these schools. In response, DoE, had furnished the vacancy position of SETs in government schools during 2020-21, details of which are given in **Table-2.5.5**.

**Table-2.5.5: Vacancy position of SETs in DoE schools in 2020-21**

Category of schools	Sanctioned strength	Persons in position	Vacancy (Percentage)
Primary	Nil	Nil	Not applicable
Secondary	1757	721	1036 (59)
Sr. Secondary	301	0	301 (100)

Source: Information provided by Directorate of Education, GNCTD.

As can be seen there were no SETs in Primary and Sr. Secondary Schools whereas 59 per cent posts of SETs in Secondary Schools were lying vacant during the period 2020-21. Thus, the DoE failed to provide inclusive education to the PwD students of the schools under them as envisaged under the Act in spite of specific directions from the Delhi High Court in this regard.

DoE stated (October 2021) that proposal for creating 450 Primary Teachers (SET) is under process. As regards Trained Graduate Teacher (TGT)-SET, it has been stated that results of the examination conducted for recruitment of 978 post of TGT-SET was awaited. Further, 268 TGT-SETs were promoted as Post Graduate Teacher (PGT)-SETs in January 2021.

### 2.5.11.2 Inadequate hostel facilities for PwD students

#### (i) Poor condition of hostels for differently abled students

There are four hostels<sup>15</sup> for differently abled students run and managed by the Department of Social Welfare, GNCTD, two at Lady Noyce School (one for boys and one for girls) and two at Sewa Kutir complex (one for students of Sewa Kutir School and one for college going visually impaired boys). Audit conducted joint inspections of these hostels with the hostel authorities. The deficiencies observed are enumerated in the succeeding paragraphs.

The boys and girls hostels at Lady Noyce School were not fully accessible for differently abled students as these did not have accessible routes/pathways, accessible parking, accessible reception and accessible lift for upper floors for them. Both the hostel buildings were in dilapidated condition with seepage, broken tiles, broken window panes, peeling plaster, etc.

**Picture 2: Dilapidated condition of Boys and Girls Hostels at Lady Noyce School**



<sup>15</sup> Hostel for college going blind students (Boys) Sewa Kutir, Hostel for Blind Boys in Government Sr. Secondary School for the Blind Boys Sewa Kutir (HGSSSB), Hostel for Deaf & Dumb Girls in Government Lady Noyce Sr. Secondary School (GHGLNS), Hostel for Deaf & Dumb Boys in Government Lady Noyce Senior Secondary School for the Deaf & Dumb (BHGLNS).



The toilets in Boys Hostel were not functioning since last two years and the boys residing there were forced to use toilets in other locations in the school. The boys' hostel also did not have drinking water and students had to get water from girls' hostel. The kitchen in girls' hostel was not functional as there was no cook and the food was being prepared in boys' hostel kitchen. Neither of the hostels had a reception room.

GSSSBB at Sewa Kutir is a residential school and all the students are accommodated in the hostel in the same building. Although the building was declared unsafe by Public Works Department in August 2018 but the hostel was still functioning from the same building. There was no drinking water facility at the hostel and bottled water was being provided. There was also no regular warden for the hostel. Further, the hostel was also over crowded with 131 students staying there against a capacity of 100. Due to overcrowding, parents of eight children who were granted admission were required to give an affidavit that they will not claim hostel facilities.

The building of Hostel for College Going Blind Boys, Sewa Kutir, Kingsway Camp was in poor condition with peeling plaster, broken tiles, seepage, exposed and rusting steel rods in concrete ceiling, deformed ceiling, etc. as shown in **Picture 3**.

**Picture 3: Dilapidated condition of Hostel for College Going Blind Students (boys), Sewa Kutir, Kingway Camp**



The occupancy was also a little more than the capacity of 100. Hostel did not have accessible routes/pathways, accessible parking, accessible corridor, accessible toilets, etc. Further, toilets in the Hostel were broken with many of them unusable for want of repairs. The door to the toilet complex was obstructed by water pipelines running above the floor in front of the gate making it potentially dangerous for the physically challenged students. The computer room was also not functional as there was seepage from roof and walls and the electric wiring very old.



Thus, the Government could not ensure even basic requirement such as drinking water, toilet facilities, fully accessible building, etc. to the differently abled students in these hostels.

DSW replied (January 2022) that they are in the process of making the building accessible to PwD. The fact that these children are physically

challenged compounds the problem of lack of facilities and action is being taken only after being pointed out by audit.

**(ii) Delay in construction of Hostel for College Going Visually Impaired Boys**

100 bedded hostel for college going visually impaired boys at Sewa Kutir Complex was approved in December 2012. In the budget speech of 2013-14 also, two new hostels, one each for boys and girls, were announced to be constructed in view of the need for more hostel accommodation for visually impaired university students. Accordingly, a preliminary estimate of ₹ 12.68 crore was submitted by Public Works Department (PWD), GNCTD in December 2014 for construction of hostel for college going blind students (boys), stipulated to be completed within ten months of receipt of Administrative Approval and Expenditure Sanction (AA&ES) for the same. Audit noted that approval (AA&ES) was pending as of January 2022 due to inordinate delay on the part of DSW/PWD in responding on the observations of the Finance Department of GNCTD on two occasions (November 2015 and January 2019). Thus, the hostel for college going visually impaired boys was not constructed even after more than nine years of taking a decision in this regard.

DSW stated (January 2022) that a letter seeking clarification has already been sent to Principal Secretary, PWD.

**(iii) Delay in construction of Hostel for College Going Visually Impaired Girls**

There is no hostel for college going visually impaired girls in NCT of Delhi. Audit observed that GNCTD had planned (May 2011) to construct a hostel for college going visually impaired girls at Sewa Kutir Complex and later the site was changed to Bal Sadan, Timarpur (September 2012). Approval of the Lieutenant Governor of NCT of Delhi was accorded in September 2013 for demolition of existing pucca structure at the site for construction of the hostel. The construction work was entrusted to PWD, GNCTD and the design prepared by PWD was approved by the competent authority in December 2013. Thereafter, it took four years for the DSW and PWD to obtain necessary approvals from local authorities, preparation of estimates etc. and expenditure sanction of ₹ 12.20 crore was issued only in January 2018. The construction was to be completed within 21 months. Only 50 *per cent* work of construction of hostel had been completed till October 2019. Thus, even after 10 years of initiating of the project in 2011, the college going visually impaired girls were deprived of hostel facility in Delhi.

DSW stated (January 2022) that construction of hostel for college going visually impaired girls has been completed and to be inaugurated soon.

However, the fact remains that DSW took more than 10 years to construct the Hostel.

## 2.5.12 Social Security and Rehabilitation of PwD

### 2.5.12.1 Schemes for welfare of Persons with Disability

#### (i) Unoperational schemes/Schemes not formulated

Section 24 of the Act provides for formulating various schemes and programmes by appropriate government to safeguard and promote the right of persons with disabilities for adequate standard of living so as to enable them to live independently or in the community. These include providing community centres with good living conditions, facilities for PwD who have no family or have been abandoned or are without shelter/livelihood, caregiver allowance to PwD with high support needs, etc.

Audit observed that six welfare schemes for PwD were announced by the Deputy Chief Minister of GNCTD, five in budget speech 2019-20 and one in budget speech 2020-21. The details of these schemes and budget allocation for these schemes for 2019-20 and 2020-21 was as given in **Table-2.5.6**.

**Table-2.5.6: Details of schemes and budget allocation**

(₹ in lakh)

Sl. No.	Name of Scheme	2019-20		2020-21	
		Budget Estimate	Revised Estimate	Budget Estimate	Revised Estimate
1	Setting-up Institute for Rehabilitation & Allied Services for person with Disability	100.00	101.00	100.00	1.00
2	Sugamya sahayak – Schemes to facilitate Mobility to differently abled students	100.00	10.00	100.00	1.00
3	Term fixed deposit for the differently abled students	100.00	1.00	100.00	1.00
4	Financial Assistance for marriage of daughter of differently abled parents	100.00	10.00	100.00	1.00
5	Scheme for skill development and rehabilitation of beggars, differently abled persons & economically weaker sections	100.00	1.00	100.00	1.00
6	Mukhyamantri Divyangjan Punarwas Sewa Yojana	Not applicable	Not applicable	1000.00	100.00

Source: Plan document, Planning Department, GNCTD.

However, no expenditure was incurred and the above schemes remained un-operational as of September 2021 as necessary guidelines and modalities were not finalized. Further, it was observed that there was no scheme for care-giver allowance to PwD with high support needs or facilities for abandoned/destitute PwD including children. This indicates that GNCTD is not at all serious in its approach for providing adequate standard of living to PwD to enable them to live independently with dignity.

DSW replied (January 2022) that component of caregiver allowance for PwD with High Support needs has been referred to FAS Branch in January 2021 for

incorporation in the existing Financial Assistance Scheme through notification of the amended scheme which is under active consideration of the FAS branch. However, DSW did not give any reply regarding implementation of other six schemes referred to above.

**(ii) Delays in sanctioning Financial Assistance (pension) to PwD**

DSW's order dated 31 March 2017 stipulated that completion of the processing and sanction of pension to PwD should be done within 45 days of receiving the application. During test check of records of District Social Welfare Offices I and II for the year 2017-18 to 2020-21, it was found that there were long delays ranging from 63 to 540 days in sanctioning of pension to PwD (**Annexure 2.6**). In 13 out of 26 cases, the pension was yet to be sanctioned even after a delay of 381 to 1502 days (July 2021). Considering the fact that GNCTD did not have information about the number of PwD and PwD need to apply themselves for pension, such a huge delay is unacceptable. A detailed examination needs to be done in this regard and responsibility for such delays needs to be fixed.

DSW attributed (January 2022) the delay to insufficient staff and stated that the observation has been noted for future compliance.

**2.5.12.2 Huge backlog of vacancies reserved for PwD**

Sections 33 (1) and 34 of the Act stipulate that the Government shall identify posts in the establishments which can be held by respective category of persons with benchmark disabilities in respect of the vacancies reserved and appoint, in every Government establishment, not less than four *per cent* of the total number of vacancies in the cadre strength in each group of posts meant to be filled with persons with benchmark disabilities. Before this Act (December 2016), there was reservation of three *per cent* in every establishment (Section 33 of the Act 1995) for PwD.

During audit, it was noticed that the SCPD had written to all Principal Secretaries/Secretaries/Special Secretaries of GNCTD on 5 May 2017 to furnish the details of vacancies as on 25 February 2016. It was also directed that special recruitment drive to fill up the reserved vacancies may be organized, if the same was not already initiated, and the reserved vacancies be filled in a time bound manner. However, SCPD issued orders only during February-December 2019 to three Departments of GNCTD to take action to fill up the backlog of reserved vacancies for PwD on priority basis, preferably through special recruitment drives as per details given in **Table-2.5.7**.

**Table-2.5.7: Details of backlog vacancies**

Sr. No.	Name of the Department and Bodies	Vacancies filled since 1996	Vacancies filled with PwD	Backlog of PwD vacancies (in percentage)	Order issued for filling up the backlog vacancies on
1.	Health and Family Welfare	7991	70	333 (82.63)	31.12.2019
2.	Social Welfare	170	13	3 (18.75)	13.02.2019
3.	Services Department	5642	125	56 (30.93)	20.09.2019
	<b>Total</b>	<b>13803</b>	<b>208</b>	<b>392 (65.33)</b>	

Source: Information provided by SCPD

Out of the above, Services Department had already taken action for filling up their backlog vacancies by sending a request to Delhi Subordinate Services Selection Board in October 2019. All other Departments of GNCTD were yet to take any action in this regard as of June 2021. This indicates lack of seriousness and intent on the part of the Government to provide employment opportunities to PwD and insensitivity towards employment problems faced by PwD.

DSW stated (January 2022) that there is no backlog of vacancies reserved for PwD in the Department. The reply does not address the issue of backlog of vacancies in GNCTD as a whole as, being the nodal Department for implementation of the Act, DSW is responsible for ensuring prescribed percentage of PwD staff in all Government Departments.

### 2.5.12.3 Deficiencies in Halfway / Long stay Homes

Half way and Long stay Homes are intended to provide social integration and socio-economic rehabilitation of mentally improved patients (for 1-2 year stay period for halfway home inmates and extended period for long stay home) and provide day care to around 100 improved patients referred by the community. These were formulated as per directions of Hon'ble High Court in 2011. As of March 2021, three Homes Nav Kiran I and II (two homes for female) Sector 3, Rohini and Nav Chetana (for male), Sector 22, Rohini were functioning out of two buildings. Occupancy of all these three Homes was less than capacity during the audit period. As of March 2021, the combined occupancy of Nav Kiran I and II was 76 against a capacity of 80 and in case of Nav Chetana, occupancy was 14 against capacity of 25. Audit observed various shortcomings in functioning of these Homes as discussed in the succeeding paragraphs.

#### (i) Poor maintenance of Homes

(a) **Non-functional Lifts:** One lift was installed in each building at the time of construction. None of these were functioning. Since there are some aged residents (Nav kiran and Nav chetna) with mobility problems viz

arthritis, knee ache, body ache, etc., use of stairs by such patients for moving from one floor to another is fraught with the risk of injuries and accident.

**(b) Fire-fighting equipment not functioning:** The Homes were equipped with internal fire-fighting equipment, but these were not in working condition.

**(c) Non-functional Solar water heating system:** Solar water heating systems were installed in these Homes but the same were not functional since last three years. Since there are no geyser systems in the washrooms, the residents either use cold water during winter season or water heated with the help of heating rod.

**(d) Electrical fault:** In both the buildings, electric wiring and switches were not in good condition as the homes were not maintained by any agency for last three years (as of July 2021). Due to frequent fault of wire and switches, fans, coolers and lights were not functioning in many rooms creating difficulties for residents during the extreme summer and winter seasons.

**(e) Unavailability of cooking system:** In respect of Nav Chetna Home, Sector 22, Rohini, piped gas supply connection was not available in the kitchen due to which food was not being prepared in-house. Lunch and dinner was being brought from the Nav kiran Home (Sector 3 Rohini), and breakfast and tea arrangements were being made through electric heater.

**(f) Water logging and blocked toilets:** In Nav Chetna Home, Sector 22, Rohini, there was water logging outside the building. Water logging (more than 3 inches) was also observed in the basement of the building which may cause weakness of the infrastructure. Further, most of the toilets were found blocked, which were causing unhygienic conditions in Nav Chetna Home.

**(g) Broken/un-utilised equipment:** Three water dispensers were procured for Nav Chetna Home in June 2018 which were not working since January 2020. Further, there were two televisions which were not functional. Gym equipment viz treadmills and related instruments, yoga items and physiotherapist equipment, etc., procured for residents were lying idle due to unavailability of staff.

Apart from the above, the Deputy Director (Disabilities) during inspection (July 2019) of Nav Kiran I and II also observed that the height of railings on second and third floor terrace needs to be increased to seven feet for the safety of residents.

In reply, DSW stated (January 2022) that estimates received from DSIIDC for maintenance work of halfway homes is under consideration. However, DSW needs to address issues relating to maintenance regularly and promptly to ensure healthy and safe living conditions to the residents.

**(ii) Shortage of clinical staff**

There was no regular Psychiatrist, General Duties Medical Officer (GDMO), Clinical Psychologist or Occupational Therapist at the Nav Chetna home. Further, Physiotherapist was also not available in the home during 2020-21. While Psychiatrist and GDMO visited the Home once in a week, Clinical Psychologist and Psychiatric Social Worker visited this home twice and thrice in a week respectively. In the absence of proper staff, the Home was not in a position to continuously provide the required services to the residents.

DSW, in its reply of January 2022, stated that as per requirement, medical, para-medical and other therapist have been posted in Asha Kiran Homes on regular basis and roaster is also implemented whereby clinical and para-medical staff are deputed on specific days of the week in various homes including Nav-Chetna.

**2.5.12.4 Poor management of Homes for intellectually impaired persons**

The DSW is running three Homes for taking care of persons with intellectual impairment (Asha Kiran Complex, Rohini; Asha Deep, Narela and Asha Jyoti, Hari Nagar). Deficiencies in functioning of test checked Asha Kiran and Asha Deep are discussed in the succeeding paragraphs.

**(i) Overcrowding in Homes**

Para 3.6 of DSW's Manual for Functionaries of Institutions and Services prescribes that the strength /number of inmates /beneficiaries in each institution /service should be maintained to its optimum level to justify its working. Asha Kiran Complex is a residential home for destitute persons with mild to profound intellectual impairment across all age groups and gender. There are four Homes in the Complex accommodating adult male, adult female, child male and child female residents, functioning since 1989. As of August 2021, there were 971 residents in the Complex against its designed capacity of 570. It was observed during joint inspection of the Complex that due to overcrowding, 53 residents were compelled to live in a cottage/dormitory. Although Governing Council of the Complex has been mentioning overcrowding of the Home in its meetings, DSW did not take any corrective action to create more capacity and decongest the complex.

DSW stated (January 2022) that issue of decongestion is being catered to by shifting of residents from Asha Kiran to Asha Deep and Asha Jyoti as and when the number of occupants fall below sanctioned strength. Further, proposals for shifting of residents to a Working Women Hostel of Department of Women and Child Development, construction of new building in Asha Kiran and construction of a new complex in Lampur are under consideration. Considering the extent of overcrowding, shifting of a few residents to other Homes will not address the huge gap between requirement and availability of accommodation.

**(ii) Lack of regular cook and dietician**

There was only one regular cook for cooking of food for the residents in female kitchen. Otherwise cooking helpers and house aunties (care givers for females) prepare food for the residents. Further, there was no dietician appointed for Asha Kiran complex where 552 out of 962 residents with severe and profound intellectual impairment are residing. Absence of dietician and regular cooks puts additional burden on other staff who may have to compromise with their duties apart from failing to ensure proper nutrition to the residents.

DSW stated (January 2022) that requisition has been sent to Delhi Subordinate Service Selection Board for filling up the vacant posts of Cooks.

**(iii) Shortage of medical, para-medical and other therapist staff**

For overall wellbeing (physical and mental) of intellectually impaired persons, there should be adequate Medical, Para-Medical and other therapist staff appointed in the Medical Care Unit (MCU) of Asha Kiran Complex, so that proper and adequate health facilities can be provided as most of the residents (552 out of 962 residents were of severe and profound intellectual impairment in July 2021) are not able to explain their problems due to intellectual impairment. During audit, it was noticed that there was a huge shortage of medical, paramedical and other therapist staff in the complex. Against a requirement of 125 staff of different cadres in health care, only 89 were available, indicating a shortage of 29 *per cent* (**Annexure 2.7**). Further, some of those included in the actual strength only visit the Home periodically. These medical staff also performed ministerial work due to shortage of staff. Similarly, in Asha Deep Complex with 114 residents, the posts of GDMO, Clinical Psychologist, Dresser and Nursing Orderly were lying vacant and only eight Auxiliary Nurse Midwife was available against a requirement of 11.

In reply, DSW stated (January 2022) that recruitment of staff is in process.

**2.5.13 No action by State Channelizing Agency to facilitate and support employment opportunity to PwD**

Section 19 (1) of the Act envisages that the Government shall formulate schemes and programmes including provision of loans at concessional rates to facilitate and support employment of PwD especially for their vocational training and self-employment. Delhi SC/ST/OBC/Minority and handicapped Finance and Development Corporation Limited (Corporation) was notified as the State Channelising Agency (SCA) in the financial year 2002-03 for disbursement of loan to PwD under National Handicapped Financial and Development Corporation (NHFDC), a Central Government entity.

### 2.5.13.1 Negligible disbursement of loans to PwD

The maximum amount of loan varied from ₹ one lakh to 7.5 lakh under different schemes. The loan is given to PwD for setting up of small business, purchase of vehicles, pursuing higher professional education, etc., and larger loan to set up big business.

Audit observed that NHFDC had allocated funds amounting to ₹ 384 lakh for 627 beneficiaries to the Corporation out of which only ₹ 33.50 lakh (8.72 per cent of total allocation) was disbursed to 31 beneficiaries (4.94 per cent of the targeted beneficiaries) in the last four years as per details given in **Table-2.5.8**.

**Table-2.5.8: Details of fund allocation and loan disbursed**

(₹ in lakh)

Year	Funds allocated by NHFDC		Amount released by NHFDC	Amount disbursed	Number of PwD benefited	Achievement (percentage) w. r. t. allocation	
	No. of Beneficiaries	Amount				In terms of amount	In terms of Number of cases
2017-18	211	105	11.10	7.95	5	7.57	2.37
2018-19	211	105	14.27	11.78	6	11.22	2.84
2019-20	124	93	20.0	9.77	13	10.50	10.48
2020-21	81	81	0	4.0	7	4.94	8.64
<b>Total</b>	<b>627</b>	<b>384</b>	<b>45.37</b>	<b>33.50</b>	<b>31</b>	<b>8.72</b>	<b>4.94</b>

Source: Information provided by Delhi SC/ST/OBC/Minorities and Handicapped Financial Development Corporation/State channelising Agency.

DSW stated (January 2022) that target could not be achieved as there were not sufficient loan applications. This indicates that the Corporation was not proactive in implementing the scheme and the objective to facilitate and support employment of PwD especially for their vocational training and self-employment could not be achieved.

### 2.5.13.2 Lack of awareness programme

The success of any welfare scheme depends upon the awareness of the beneficiaries about the scheme. Therefore, wide publicity of benefits under the schemes becomes imperative for mobilizing maximum number of PwD for availing such benefits. Audit observed that no awareness program was carried out during last four years either by the Corporation or GNCTD. SCPD had directed (December 2019) DSW and the Corporation to decide the marginal money<sup>16</sup> and fund arrangement for awareness of the schemes within two months but no action has been taken in this regard as of August 2021.

In response, the Corporation stated (September 2021) that awareness programme could not be run due to unavailability of funds. Further, DSW

<sup>16</sup> Upfront down payment

stated (January 2022) that request for margin money component for the loan scheme is under consideration.

The reply is not correct as Corporation could use only 8.72 *per cent* of the funds allocated to it between 2017-18 and 2020-21.

### **2.5.13.3 Loan scheme ‘Financing NGOs working in area of disabilities’ not implemented**

NHFDC had launched a loan scheme (May 2013) known as Micro Credit Scheme (MCS) to provide financial assistance in the form of loan to NGOs working in the area of disabilities to make disabled persons social entrepreneurs by setting up/expansion of an income generating activity for the benefit to the disabled persons. The nature of income generating activity will be such that it involves the PwDs directly and income will be distributed among the PwDs. The maximum amount of loan to an NGO is limited to Rupees five lakh. Audit observed that the Corporation did not implement MCS as is evident from the fact that no demand for funds for the scheme was raised by it with NHFDC during last four years (2017-18 to 2020-21). Failure to implement this scheme indicates lack of intent on the part of GNCTD in improving the economic condition of PwD.

DSW stated (January 2022) that the Corporation shall be requested to publicise the scheme so that NGOs could be made aware of the same. The reply indicates that GNCTD did not take any action to implement the scheme.

### **2.5.14 Inordinate delay in releasing grants to NGOs engaged in the welfare of PwD**

Section 27 of the Act provides that the Government may grant financial assistance to Non-Governmental Organizations (NGOs) to undertake services and programmes of rehabilitation in the areas of health, education and employment, etc., for all persons with disabilities.

Audit observed that during the period 2017-18 to 2020-21, grants were released (in three instalments) to 15 NGOs for welfare of PwD by the DSW. In the first two instalments, grant totaling 50 *per cent* of grant released in the previous year is released after receiving utilization certificate for the previous year’s grant. Thereafter, the quantum of eligible grant is worked out on the basis of inspection by DSW and number of beneficiaries and the balance amount of grant is released as third instalment. Out of 15 NGOs, six were selected for audit. It was seen that DSW has not released Grant-in-Aid (GiA) to any NGO for the year 2020-21. Further, the third instalment of GiA totalling ₹ 4.87 lakh in respect of two NGOs (The Blind Relief Association, Delhi and Masoom Foundation, Delhi) and entire GiA of ₹ 7.84 lakh in respect of one NGO (AWWA Asha School, Delhi) for the year 2019-20 has not been released as of January 2022.

Delay in payment/non-payment of GiA compromised the ability of these NGOs in providing various services to PwD.

Failure to disburse/short-disbursements of GiA to NGOs also resulted in huge savings ranging from 26 *per cent* to 100 *per cent* out of the budget allocations as per details given in **Table-2.5.9**.

**Table-2.5.9: Disbursement of GiA to NGOs**

(₹ in lakh)

Financial year	Budget allocation	GiA Disbursed	Savings	Percentage of savings
2017-18	75.00	37.29	37.71	50.28
2018-19	80.00	59.02	20.98	26.23
2019-20	89.00	15.80	73.20	82.25
2020-21	89.00	0.00	89.00	100

Source: Information provided by DSW, GNCTD

DSW stated (October 2021/January 2022) that the disbursement of GiA depends on the final recommendation of the GiA committee. The reason for GiA not getting disbursed in the financial year 2019-20 was that meeting of GiA could not be held in time as regular Deputy Director was on medical leave. After movement of the proposal from different branches through Finance Department, the same was lying with the Finance Department as of January 2022. Although the GiA committee meeting was held on 29 June 2021 for 2020-21, the proposal could not be sent to Finance Department as budget was insufficient and additional budget allocation was yet to be made. It was also stated that the observations are noted for future compliance. Administrative delays must be avoided through strict monitoring and responsibility needs to be fixed.

### 2.5.15 Meagre financial assistance to NGOs

GNCTD provide GiA to social welfare institutions/organisations under 'Grants to Social Welfare Institutions/Organisations National Capital Territory of Delhi Rules, 2008'. Under the Rules, GiA on recurring expenditure is limited to 90 *per cent* of the total expenditure on approved items or ₹ 500 per inmate per month or as may be revised by the Government, whichever is less. It has been observed that though the cap of ₹ 500 per inmate per month was fixed in 2008 and more than 12 years have passed, the cap has not been revised. Since the cost of living has increased, not revising the cap on maximum assistance to the institutions/organisations which were helping the Government in fulfilling its mandated functions, deprived them of adequate financial support.

DSW, in its reply (January 2022) stated that action for enhancing assistance in Delhi Grants Rule, 2008 has been initiated and is under process.

### **2.5.16 Research and Development for enhancement of habitation and rehabilitation not conducted**

Section 28 of Act provides that the Government shall initiate or cause to be initiated research and development through individuals and institutions on issues which shall enhance habitation and rehabilitation of Pwd and on such other issues which are necessary for the empowerment of persons with disabilities. Audit observed that Department has not taken any action in pursuance to these provisions of the Act.

DSW stated (January 2022) that organisations in Delhi are availing assistance for this purpose from a scheme of GoI and action for wider publicity of the scheme is being initiated. The reply did not provide any information about the efforts of GNCTD for research on the subject.

### **2.5.17 Poor condition of vocational training/skill development centers for PwD**

Audit observed that there were only two centres for vocational training and skill development of PwD, Training-cum-Production Centre (TCPC) and Sheltered Workshop for Physically Handicapped (SWPH) both located at Ramesh Nagar. Both these centres are for males only.

Audit examined records of both these institutions and noticed deficiencies in their functioning. Both these centers were running in one hall at 1-B block, Ramesh Nagar, Delhi. The work of stitching of clothes for inmates of Homes, Halfway/Long stay Homes, Hostels, etc., under the Department of Social Welfare, GNCTD was done in the TCPC and SWPH. Each center has a sanctioned capacity of 50 trainees each but neither of these institutions were giving training to PwD. In these institutions, 3-4 PwDs were working as tailors since long but have not taken any training in the last five years. Also, there were no instructors in these institutions for giving training for development of skills of PwD.

Thus, DSW did not do anything to address the important aspect of vocational training of PwD so as to enable them to be self-employed as mandated under the Act. Inaction on the part of GNCTD indicates lack of seriousness on their part in improving the living standards of PwD.

In reply, DSW stated (January 2022) that vocational training is being imparted in Nav Kiran Halfway/Long Stay Homes for treated mentally ill females in collaboration with ICICI foundation and in Asha Kiran Complex also in 10 trades. It was also stated that the Department, in collaboration with Sun Foundation, is imparting vocational training to the students of Special School for Hearing Impaired. As regards TCPCs and SWPHs, it was stated that a comprehensive proposal would be moved for reviving them after evaluation.

### **2.5.18 Conclusion**

The Rights of Persons with Disability Act, 2016 (Act) was enacted by the Government of India for ensuring rights of equality, non-discrimination, community life, education, social security, health, rehabilitation, etc. to the PwD. Audit observed that the efforts of Government of National Capital Territory of Delhi (Government) in implementing various provisions of the act lacked intent and there were serious shortcomings in ensuring the rights of PwD in almost all the areas where PwD needed welfare measures from the Government, such as social security, health facilities, accessibility to public places, educational and employment opportunities etc.

Implementation of the Act by the Government lacked momentum ab-initio as there were delays in notification of State Rules and creation of institutions for this purpose such as State Advisory Board, Committee on Research and District Level Committees, etc. The Government did not have any data as to the number of PwD in Delhi as it did not conduct any survey to identify persons with disabilities (PwD). Instead, it relied on Census 2011 data which had data on population with only seven out of 21 types of disabilities listed in the Act. Thus, the Government did not have the data necessary for planning and formulation of schemes and programmes for the welfare of the PwD. There were also delays in designation of authorities to certify disability for PwD which delayed availability of welfare measures for PwD.

Education facilities provided to children with disabilities were inadequate in terms of quality as well as quantity and institutions providing education suffered from shortage of teachers, residential accommodation, transport facility etc. Buildings of three out of four special schools for PwD were also being occupied by various other Government offices. Due to this, these schools were overcrowded. Another school was functioning from a building which was declared unsafe by the Public Works Department. All the school campuses were unhygienic and dirty. The schools also suffered from shortage of teaching and non-teaching staff and lack of basic infrastructure such as barrier free environment, safe drinking water, toilets, etc. Audit also observed that there were no special schools for visually impaired girls. In Delhi Government schools, there were shortage of Special Education Teachers to cater to the educational needs of PwD.

There were four hostels for differently abled students run by the Department of Social Welfare, GNCTD, three for school going children and one for college going visually impaired boys. There was no hostel for college going and school going visually impaired girls. The deficiencies in the existing hostels included unhygienic and dirty campuses, dilapidated hostel building, lack of basic facilities such as safe drinking water, accessible toilets, etc. The

hostel for visually impaired school going boys at Government Sr. Secondary School for Blind Boys at Sewa Kutir Complex was functioning from an old and unsafe building. The hostel was also overcrowded with 131 students against a capacity of 100. Decision regarding construction of one hostel each for college going visually impaired boys and girls were taken up more than 10 years ago but was yet to be completed. Homes for intellectually challenged persons also did not fare any better with overcrowding and shortage of medical, para-medical and other staff.

The approach of the Government in providing employment opportunities to PwD was lackadaisical. Two institutions established by the GNCTD for providing vocational training to PwD did not provide training to PwD during the last 10 years. Further, NGOs engaged in providing rehabilitation services to PwD were provided Grants-in-Aid with delay and at very old rates. The rates were prescribed in 2008 and have not been revised till date (October, 2021). There were also huge backlog of vacancies reserved for PwD in various Departments of GNCTD.

Six schemes for the welfare of PwD were announced in the budget speech 2019-20 and 2020-21, but none of them were made operational as the modalities and guidelines were not finalized.

#### **2.5.19 Recommendations**

The Government may -

- Take immediate action to identify all the PwD in Delhi so as to plan availability of adequate facilities and services under the Act to them.
- Assess the requirement of special educational and other institutions and take adequate action for establishing the same and mitigating shortage of teaching, medical and other staff in various institutions for PwD including Special Education Teachers in Government Schools.
- Ensure adequate infrastructural and other facilities such as safe, clean and barrier free environment, hostel facilities, etc., in special schools and other institutions for PwD and in all government buildings and public transport.
- Impart vocational training and skill development to more PwD so that they get employment and become economically independent.

## Department of Tourism

### 2.6 Compliance Audit on Tourism activities in National Capital Territory of Delhi

#### 2.6.1 Introduction

National Capital Territory of Delhi has large potential for tourism as it is not only the capital of the Country, it is also enriched due to its vast cultural heritage and history as way back as the epic period. It has seen empires come and go, each having its own distinct imprint and architectural marvels. As it was the seat of government for many of these empires and continues to be used as a gateway for travelers to other cities of tourist interest, it has considerable scope for being developed as a tourist destination. Tourism also has high revenue potential for the government if tourists could be attracted by strategising the requirements through a sound Tourism Policy.

Department of Tourism (DoT), Government of National Capital Territory of Delhi (GNCTD) is the nodal department for formulation, implementation and monitoring of tourism related schemes/plans for promotion of tourism, creation of tourism infrastructure and essential services and coordination and regulations related to tourism matters. The schemes/activities of DoT are implemented through the Delhi Tourism and Transportation Development Corporation (DTTDC), which was incorporated by the GNCTD in the year 1975 to promote tourism in Delhi. DTTDC's functions include dissemination of tourism related information, providing tourism related services, recreational facilities, creating tourism infrastructure and training of manpower for tourism sector. GNCTD provides limited tourism related services in NCT of Delhi such as Hop-On Hop-Off (HOHO) Bus Service, Bed and Breakfast Scheme, and facilitation for shooting of films in Delhi.

Apart from the Department of Tourism and DTTDC, Departments of Archaeology and Delhi Archives of GNCTD also play a role in promotion of tourism in Delhi through preservation of cultural heritage. The Department of Archaeology is responsible for protection and maintenance of ancient monuments of local importance in NCT of Delhi, and the Department of Delhi Archive is responsible for preservation of rare documents, manuscripts, books, maps and other record materials. Till November 2021, conservation of 65 sites/ monuments were under the purview of the Archaeology Department, GNCTD. The monuments of national importance are declared as centrally protected monuments and maintained by the Archaeological Survey of India, Government of India (ASI-GoI). However, protection and maintenance of ancient monuments of local importance is the responsibility of respective State Governments.

## **2.6.2 Scope of Audit & Methodology**

This audit was conducted to assess whether the initiatives taken by GNCTD to promote tourism in Delhi were adequate and effective. The records of Department of Tourism, DTTDC and Department of Archaeology of GNCTD of the period from 2017-18 to 2020-21 were examined. Audit also conducted joint physical verification of different monuments and sites managed by these Departments/DTTDC.

## **Audit Observations**

### **2.6.3 Absence of Tourism Policy and Long-Term/Strategic/Master Plans**

(i) To achieve the overall vision for development of Tourism, the following objectives need to be achieved by an effective tourism policy:

- Positioning and maintaining tourism development.
- Enhancing and maintaining competitiveness of the place as a tourist destination.
- Improving the existing tourism products and expanding these to meet new market requirement.
- Creation of world class infrastructure.
- Developing sustained and effective marketing and advertising plans and programs.

(ii) The National Tourism Policy (NTP), 2002 was formulated by the Ministry of Tourism (MoT), Government of India (GoI) with an objective to position 'Tourism' as a major economic growth engine in the country.

However, no Tourism Policy to achieve the overall vision of tourism development in line with NTP has been formulated by the GNCTD despite Delhi's rich cultural heritage and its advantageous location as a transit hub. Moreover, no long-term /strategic plans have been prepared by DoT or DTTDC, the main entities involved in promotion of Tourism.

The DoT stated (January 2022) that DTTDC has submitted a draft policy in January 2022 which was under consideration before the higher authorities. The reply confirms the fact that no tourism policy has been finalised so far (January 2022). The lackluster attitude in this regard has led to a direction less approach to an important source of revenue and foreign exchange and a missed opportunity to develop Delhi as a tourist hub.

### **(iii) Absence of Tourist Data information**

Ministry of Tourism (MoT), GoI compiles the number of domestic and foreign tourists visiting different states and union territories. This is compiled from the information shared by the respective State Governments, which are in turn collected from hotels and other establishments providing accommodation to tourists.

Audit observed that GNCTD does not collect such data and hence, no data was shared with MoT, GoI either. In the absence of data, GNCTD does not have a sound basis to analyse important information about existing and potential tourists and their requirements and develop a strategy to boost tourism with a deeper understanding of the market.

Hence, absence of Tourism policy as well as any long-term strategic master plans and failure to collect information regarding tourists' inflow reflects complete neglect of 'Tourism' sector by the GNCTD.

This issue was also highlighted in the Report of Comptroller and Auditor General of India on Social and Economic Sector (PSU) for the year ended 31 March 2014 vide Paragraph 2.2.3.1. However, no compliance on audit observation was made by the Government during the last seven years.

Neglect of the 'Tourism' sector by GNCTD is evident from the fact that no new tourism-related project has been initiated by the GNCTD during the Audit period of last four years, i.e., from April 2017 to March 2021. Even the operation and maintenance of existing facilities /projects /monuments /tourist sites was found deficient by Audit on multiple aspects, which is discussed in the subsequent paragraphs.

#### **2.6.4 Advisory Council for ancient and historical monuments and archaeological sites and remains of state importance not constituted**

As per the Delhi Ancient and Historical Monuments and Archaeological Sites and Remains Act, 2004, an Advisory Council was to be constituted for the purpose of advising the Government on matters of policy relating to ancient and historical monuments and archaeological sites and remains of State importance.

Audit observed that the Advisory Council was yet to be constituted even after 17 years of commencement of the Act. This indicates laxity on the part of GNCTD in conservation and maintenance of the monuments of State importance.

The Department of Archaeology stated (January 2022) that a proposal for constitution of Delhi Archaeological Advisory Council has already been submitted in August 2020 and approval of the Competent Authority is awaited.

#### **2.6.5 Insignificant/Nominal expenditure on 'Tourism'**

Details of expenditure incurred by Department of Tourism and DTTDC during the years 2017-18 to 2020-21 is detailed in **Table-2.6.1**.

Table-2.6.1- Details of expenditure

(₹ in crore)					
Details	2017-18	2018-19	2019-20	2020-21	Grand Total
<b>Department of Tourism (DoT)</b>					
Expenditure on salary and wages.	1.45 (9.91)	1.72 (10.12)	1.85 (4.57)	1.79 (6.83)	6.81 (6.92)
Grant in Aid (GIA) released to DTTDC and DIHMCT <sup>17</sup>	13.18 (90.09)	15.28 <sup>18</sup> (89.88)	13.19 <sup>19</sup> (32.55)	24.43 <sup>20</sup> (93.17)	66.08 (67.18)
Expenditure on other activities	0.00	0.00	25.48 <sup>21</sup> (62.88)	0.00	25.48 (25.90)
<b>Total expenditure</b>	<b>14.63</b>	<b>17.00</b>	<b>40.52</b>	<b>26.22</b>	<b>98.37</b>
<b>DTTDC (related to tourism)</b>					
<b>Total Income</b>	<b>62.51</b>	<b>48.12</b>	<b>135.55<sup>22</sup></b>	<b>30.60</b>	<b>276.78</b>
Expenditure on salary and wages	17.23 (26.83)	15.42 (31.72)	15.17 (12.25)	11.72 (27.40)	59.54 (21.31)
Expenditure on tourism related and Other activities	46.98 (73.17)	33.18 (68.28)	108.62 <sup>23</sup> (87.75)	31.06 (72.60)	219.85 (78.69)
<b>Total Expenditure</b>	<b>64.21</b>	<b>48.60</b>	<b>123.79</b>	<b>42.78</b>	<b>279.39</b>
<b>Profit/Loss (-)</b>	<b>(-) 1.70</b>	<b>(-) 0.48</b>	<b>11.76</b>	<b>(-) 12.18</b>	<b>(-) 2.61</b>

Note: Figures in bracket indicates percentage of total expenditure during the year.

It may be seen from Table 2.6.1 that:

- (i) DoT incurred nominal expenditure during 2017-18, 2018-19 and 2020-21 ranging between ₹ 14.63 crore and ₹ 26.22 crore. The expenditure during 2019-20 increased to ₹ 40.52 crore mainly due to payment of ₹ 25.48 crore for purchase of land for Delhi Sadan which is not related to tourism activities.
- (ii) DoT released GIA to DTTDC and DIHMCT for tourism related activities ranging between 32.55 to 93.17 per cent of its total expenditure in the respective year during the period 2017-21.

DTTDC incurs expenditure on tourism activities such as participation in National/International events, advertisement and publicity, organization of fair and festivals, strengthening of Tourist Information centres (TICs), beautification of entry points, from Grant in Aid

<sup>17</sup> Delhi Institute of Hotel Management & Catering Technology

<sup>18</sup> Includes GIA to DIHMCT of ₹ 5.42 crore

<sup>19</sup> Includes GIA to DIHMCT of ₹ 0.46 crore

<sup>20</sup> Includes GIA to DIHMCT of ₹ 2.50 crore

<sup>21</sup> Incurred for purchase of land for construction for Delhi Sadan (Delhi Sadan is to be developed for providing reliable and economic accommodation for staying of dignitaries/officers coming to Delhi for various purposes).

<sup>22</sup> Include ₹ 64.39 crore income from Mukhya Mantri Tirth Yatra Yojna (MMTYT).

<sup>23</sup> Major expenditure of ₹ 61.25 crore incurred on MMTYY out of funds of ₹ 81.45 crore received from Revenue Department, GNCTD. MMTYY is a scheme of Delhi Government devised with the aim to provide government assistance to those senior citizens who are not able to undertake the pilgrimage journey outside Delhi on their own. DTTDC was selected as Nodal Agency to operate the Yatra on behalf of Delhi Government.

received from DoT. However, no impact analysis has been done by GNCTD/DTTDC for expenditure incurred on these promotional activities by GNCTD/DTTDC.

- (iii) The expenditure of ₹ 108.62 crore during 2019-20 was on higher side as DTTDC booked expenditure of ₹ 61.25 crore and GST thereon of ₹ 3.22 crore incurred under MMTYY out of funds of ₹ 81.45 crore received from GNCTD during 2018-19 which did not relate to tourism activities in GNCTD. Thus nominal expenditure of ₹ 46.98 crore, ₹ 33.18 crore, ₹ 44.15 crore and ₹ 31.06 crore was incurred during the years 2017-18, 2018-19, 2019-20 and 2020-21 respectively by DTTDC on tourism related activities excluding salary and wages. Expenditure on salary and wages on tourism related activities ranged between ₹ 11.72 crore (2020-21) and ₹ 17.23 crore (2017-18).
- (iv) DTTDC incurred losses in all the years during 2017-21 on tourism related activities, except profit of ₹ 11.76 crore during the year 2019-20 which was mainly due to income from MMTYY (₹ 3.15 crore) and interest earned (₹ 3.43 crore) on Fixed Deposits.
- (v) The expenditure on Tourism activities by DTTDC during 2017-21 was only 3.11 to 8.80 *per cent* of total expenditure of the DTTDC.

Thus, it is evident that nominal expenditure was incurred by DoT/DTTDC on Tourism Activities in Delhi. It also shows that GNCTD could not generate much revenue from Tourism.

#### 2.6.6 'Tourism' not a priority area for DTTDC

DTTDC was setup for overall development and promotion of Delhi as a tourist destination for domestic and international tourists visiting India. Tourism related infrastructural works were also assigned subsequently to DTTDC. As per the Citizen Charter of DTTDC, the main functions of the Corporation were the following:

- To disseminate tourism related information;
- To provide tourist related services,
- To provide recreational facilities;
- To develop tourism infrastructure; and,
- To train manpower for tourism.

Audit analysed the deployment of manpower and expenditure on Tourism related divisions/activities, and observed that 'Tourism' was a low-priority activity for DTTDC.

**Manpower:** Out of 535 employees in DTTDC (as of January 2021), only 119 employees, i.e. 22 *per cent*, were deployed for tourism-related work while the

remaining 416 employees were deputed in Corporate office (99 employees) Liquor division (288 employees) and engineering division (29 employees).

**Expenditure:** During the period of audit, the expenditure on tourism activities ranged from 3.11 to 8.80 *per cent* of total expenditure, while the expenditure on liquor activities, ranged from 87.23 to 93.79 *per cent*.

Thus 'Tourism' occupied a low priority area for DTTDC, which was setup for promotion of tourism but has veered towards other areas, i.e., retail sale of Liquor<sup>24</sup>.

DTTDC stated (January 2022) that out of total expenses of ₹ 1,273 crore during 2020-21, ₹ 1200 crore relates to Indian Made Foreign Liquor and Country Liquor. So out of remaining ₹ 73 crore, around 89 *per cent* (₹ 65 crore out of ₹ 73 crore) was incurred on tourism related activities. The reply is misleading and does not address the audit contention that low priority was given to tourism activity.

### **2.6.7 Tourist Information Centers not setup at major arrival points**

Information regarding tourist places, boarding and lodging and transportation facilities can be disseminated to tourists through the Tourist Information Centers (TIC). Absence of correct information and existence of touts has been a major challenge in tourism sector.

DTTDC is running (June 2021) seven<sup>25</sup> Tourist Information Centers/ Counters/Desks to facilitate tourists by providing the information<sup>26</sup> about the city and other places around Delhi.

Audit, however, observed that TICs were not available at many important arrival points in Delhi, such as International Terminal of Delhi Airport, Old Delhi Railway Station, Inter State Bus Terminus (ISBT) Kashmiri Gate, etc. It was further observed that actual requirement of TICs has not been assessed during the period of four years from April 2017 to March 2021.

The Department stated (January 2022) that DTTDC was planning to restart an elaborate TIC (Tourist Information Counter) at International Airport to facilitate foreign tourists. Further, the TICs at Old Delhi Railway Station, ISBT Kashmiri Gate, etc., would be started on availability of opportunity and resources.

---

<sup>24</sup> As per the Excise Policy, 2021 of GNCTD, retail sale of Indian Made foreign Liquor and Foreign Liquor has been taken away from DTTDC from 16 November 2021.

<sup>25</sup> Connaught Place (two TICs), Janpath, Terminal-1 Domestic Airport Delhi, Dilli Haat-INA (two TICs) and New Delhi Railway Station.

<sup>26</sup> The information is provided by answering queries on telephone as well as to walk-in clients.

## 2.6.8 Deficiencies in tourism-related services rendered

GNCTD provides limited tourism related services in NCT of Delhi, which were Hop-On Hop-Off (HOHO) Bus Service, Bed and Breakfast Scheme, and facilitation for shooting of films in Delhi. However, these services were also not managed efficiently and audit observed the following deficiencies:

### 2.6.8.1 HOHO Bus Service

With the objective of facilitating and providing the tourists with an opportunity to explore Delhi and its heritage through sightseeing in a relaxed and flexible manner, the HOHO Bus Service was started in 2010 in Public Private Partnership (PPP) mode for a period of 10 years. Commuters can get on or get off these buses anywhere on the route, which covered various tourist spots in Delhi.

All the operational activities related to HOHO Bus Service was set up by operator after consultation with DTTDC which *inter alia* include route, frequency of buses, fare to be charged, fare collection mechanism and commercial arrangements for operation of HOHO Bus Service. The service was discontinued in July 2020, however, no efforts were made to restart the bus service. A proposal for running 25 new HOHO Buses was initiated in June 2019 but it could not be finalised.

Audit observed the following deficiencies in operation of HOHO Bus Service during the period of 10 years:

- There was lack of monitoring by DTTDC. In May 2011, a committee headed by Manager was constituted to compile a report on weekly progress on ridership on HOHO Bus Service. However, no such report was compiled by the DTTDC.
- DTTDC got GPS links of buses on 5 February 2016 from the Operator. However, it did not use the link for checking the frequency of buses and exact number of buses on route.
- As against the 14 buses originally envisaged, number of buses kept going down and only five buses were operational from 2017-18 onwards. DTTDC did not devise any mechanism to take riders' feedback about the bus service, or filing of complaints by the riders.
- HOHO bus service incurred losses since its inception and out of total dues amounting to ₹ 2.65 crore payable to DTTDC, being 12 *per cent* revenue share, the Operator had not paid ₹ 1.48 crore.
- As per proposal submitted by DTTDC in June 2019, the reasons for the poor response of existing HOHO bus service in Delhi were as under:
  - a) Buses were running only on the beaten track and missed many interesting tourist attractions of Delhi;

- b) Not able to retain interest of passengers through its on-board pre-recorded/live commentary;
- c) Long waiting period (minimum 45 minute waiting period) to catch HOHO bus for next tourist point;
- d) Lack of halting point/ bus stop with seating facility available at the site/monuments where the bus is going to stop;
- e) The bus service did not have professionally trained volunteers on board; and
- f) Lack of information communication and technology enabled smart service.

However, the present status of the proposal was not provided to Audit.

Thus, after July 2020 GNCTD did not provide any dedicated bus service for tourists visiting Delhi. DTTDC could not assess the quality of service and steps for betterment of service due to lack of monitoring of number of passengers and frequencies of buses etc.

The DoT stated (January 2022) that on expiry of existing contract of operation of HOHO bus service on 9 July 2020, it was not feasible to process fresh tenders for the bus service due to Covid-19 pandemic. As regard monitoring of Bus service, DTTDC stated that the same was monitored through Project Management Unit (PMU) which included senior officers of DTTDC as well as operator.

The reply regarding expiry of existing contract needs to be viewed in the light of proposal for 25 new buses initiated by DTTDC in June 2019 which could have been completed before the onset of the pandemic. The reply regarding monitoring of Bus service is factually incorrect as no information viz. number of passengers who availed bus service during a month, facilities in bus, training and education of bus staff was provided to Audit.

#### **2.6.8.2 Bed and Breakfast Scheme**

The Bed and Breakfast Scheme provides budget accommodation approved by Department of Tourism, GNCTD, to tourists who wish to enjoy traditional Indian home culture and gain the confidence of the families support and protection and go back with pleasant memories. The list of Bed and Breakfast Establishments approved is available on the website of DoT, GNCTD.

Audit observed that DoT did not put in place a mechanism for periodical inspection of establishments to ensure that the services provided were as per the norms prescribed.

DoT stated (January 2022) that it has been decided to carry out random and surprise checking to ensure that provisions made under this Act and Rules are not violated by them.

### 2.6.8.3 Single-window clearances for Film Shooting

GNCTD appointed (June 2012) DTTDC as the nodal agency for single window clearance for permission to film makers for shooting. Subsequently, a Film Shooting Facilitation Cell was created within the DTTDC with the objective that DTTDC will act as a bridge between the filmmakers and the stakeholder agencies for facilitating single window clearances of permission for film shootings in Delhi. An agency was selected for framing a policy document for Single Window Clearance Mechanism for film shooting facility in February 2020. The agency submitted the final draft in August 2020.

However, the objective for single-window clearance to film makers could not be achieved as no mechanism was devised by DTTDC even after more than nine years of appointment of DTTDC as the nodal agency.

DTTDC stated (January 2022) that when any film maker/ producer approaches them for seeking the film shooting permission in Delhi, DTTDC used to assist them through letters to various authorities for granting the permission. The reply confirms that DTTDC failed to provide single window clearance to film makers.

### 2.6.8.4 Theme-based Tourist Circuits not started

Ministry of Tourism, GoI launched (2014-15) the Swadesh Darshan Scheme<sup>27</sup> for integrated development of theme-based tourist circuits in the country, under which grants up to ₹ 100 crore were to be provided to each state.

For implementing this Scheme, a meeting of Secretary (Tourism), GNCTD and MD & CEO, DTTDC was held with the Secretary (Tourism), GoI (July 2016) for submission of proposals under Swadesh Darshan Scheme. It was decided in the meeting that funds under Swadesh Darshan Scheme can be made available to Delhi for development of seven heritage routes of Delhi with special focus on Mehrauli Node and spiritual circuit along with construction of elevated walkways connecting Qutub Metro Station to Qutub Minar.

Audit observed that GNCTD initiated action belatedly. Even after more than three years from the date of proposal (July 2016), Consultant for preparation of Detailed Project Report, etc., could not be appointed (March 2020). Audit further observed that DoT directed DTTDC in November 2017, April 2018 and June 2018 to look into the matter and furnish the latest status. However, no reply of DTTDC was found on record. Thus, GNCTD was unable to avail GoI grants as no proposal was finalised and submitted to GoI.

DoT stated (January 2022) that the RFP was floated for appointment of consultant in November 2019 but only a single bid was received, hence, tender was cancelled and fresh tender process was started in December 2019.

---

<sup>27</sup> Central Sector Scheme

But due to Covid 19 pandemic, not much progress could be made till August 2020. Later on, in July 2021, MoT informed that the Swadesh Darshan Scheme is under review and sanctioning of new projects under the scheme was subject to the outcome of the ongoing review.

The reply of DoT itself indicates that process was initiated very late at the fag end of the scheme period which was up to March 2020 and any action taken thereafter had no relevance.

Thus the lacklustre attitude and slow approach of the Department led to forgoing of the opportunity to improve theme based tourist circuit in Delhi and to receive grant of ₹100 crore from GoI.

### **2.6.9 Poor maintenance of tourism-related sites/infrastructure**

Archaeology Department, GNCTD has 65 monuments under its jurisdiction in NCT of Delhi, which are to be conserved and maintained properly. Besides these, few tourist spots such as *Dilli Haats*, Garden of Five Senses, etc., have also been setup by the DTTDC. Audit did joint inspection<sup>28</sup> (June 2021) of 18 monuments<sup>29</sup> and two other sites (Bhalswa Lake and Garden of Five Senses) to assess the facilities available and their condition. The deficiencies observed by Audit during joint inspection are indicated in **Annexure 2.8**.

#### **2.6.9.1 Poor upkeep and maintenance of monuments conserved**

- **No system for maintenance of monuments after their conservation:**  
Audit observed that Imambada, Zail Bawana and Garden Bagichi were in dilapidated conditions. Neither does the Department undertake maintenance of these monuments on their own, nor have they appointed any private agency to undertake day to day maintenance. Department incurred ₹ 75.84 lakh on conservation of the Imambada (₹ 26.34 lakh during 2014-16) and Zail Bawana (₹ 49.50 lakh during 2016-20). Despite incurring expenditure, these monuments were found in dilapidated condition. Photographs No. 1 and 2 indicates conditions of Imambada and Zail Bawana:

---

<sup>28</sup> Joint inspection conducted by Audit team with Management representative of Archaeology Department (for 18 monuments) and DTTDC (for two other sites).

<sup>29</sup> Sarai (Badarpur Village), Mahal (Mahipalpur Village), Katra (Mehram Nagar near domestic airport), Tomb at Gautam Nagar (near AIIMS), Gol Gumbad (near Lodhi Road), Mosque (Lodhi Garden), Kos Minar (Narela), Dara Shikoh Library (Mori Gate), Zail Bawana (Bawana), Imambada (Qutub Road near New Delhi Railway Station), Horse stable (Mehrauli Archaeological Park), two Tombs at Mehrauli Archaeological Park, Baradari (Sadhna Enclave, Sheikh Sarai), Jharna (Mehrauli), Mutiny Memorial (Northern Ridge near Hindu Rao Hospital), Sarai (National Zoological Park, Pragati Maidan), Garden Bagichi (Delhi Golf Club).

**Photograph - 1**



**Dilapidated condition of Imambada (Photograph taken on 22.06.2021 at 11.15 AM)**

**Photograph - 2**



**Seepage in Zail Bawana (Photograph was taken on 17.06.2021 at 1.15 PM)**

**Photograph - 3**



**Dilapidated condition of Garden Bagichi monument at Delhi Golf Club (Photograph was taken on 22.06.2021 at 1.15 PM)**

**Photograph - 4**



**Peeling out of outer plaster and discoloring of outer wall of Garden Bagichi at Delhi Golf Club (Photograph taken on 22 June 2021 at 1.20 PM)**

- **Monument Information Boards not installed:** Audit observed that monument information boards were missing at two monuments (Katra and Garden Bagichi). In one monument (Sarai), the board was found to be covered with bushes.

**Photograph - 5**

**Monument board covered with bushes at Sarai**



**Monument Board covered with bushes at the monument Sarai at National Zoological Park (Photograph taken on 23.06.2021 at 11.45 AM)**

The Department stated (January 2022) that the conservation work at Katra and Garden Bagichi was commenced by the Department of Archaeology which could not be completed due to permission issue raised by the Defence Estate Office. The Cultural Notice Boards on these monuments will be installed after completion of its conservation work. First phase of conservation work of monument known as Sarai at National Zoological Park has been completed. After completion of the 2<sup>nd</sup> phase of its conservation, a new Board at prominent location will be installed.

- **Absence of security:** Safety is important not only for the upkeep of the monuments but also for the visitors going there. Audit observed that none of the 18 test-checked monuments had security guards as well as safety devices such as CCTV cameras and firefighting equipment (refer **Annexure 2.8**). The Department in its reply accepted the audit observation and stated that (January 2022) a feasibility study would be carried out for installation of CCTV cameras and firefighting equipment.

- **Unavailability of toilets:** Audit observed that toilet facilities were not available in any of the 18 test-checked monuments.
- **Inaccessible to differently abled persons:** Audit observed that none of these monuments were accessible to differently abled persons, as wheelchairs accessibility and information in brail script were not available in any of the monuments. This was also in violation of Persons with Disabilities (Equal Opportunities, Protection of Rights and Full Participation) Act, 1996. The Department accepted the audit observation and assured to carry out feasibility report on this issue.
- **Gates found closed:** During joint inspection, entry gates of two monuments (Zail Bawana and Mutiny Memorial) were found locked though these were stated to be open for public.

**Photograph - 6**



**Gate found locked Zail Bawana  
(Photograph taken on 17.06.2021 at 13.15 PM)**

**Photograph - 7**



**Gate locked at Mutiny Memorial  
(Photograph taken on 26.08.2021 at 2:49 PM)**

### 2.6.9.2 Deficiencies found in two other tourists sites

- a) **Bhalswa Lake:** Bhalswa lake was handed over to DTTDC by Village Panchayat in year 1992 to provide recreational boating to public of Delhi. DTTDC developed and maintained this facility. Audit observed that although Bhalswa Lake had good potential for attracting tourists, however, no CCTV camera was available at the lake to ensure safety of tourists.
- b) **Garden of Five Senses:** The Garden of Five Senses is a park developed by DTTDC in February 2003 spread over about 20 acre of land. The Garden has been conceptualized with a view to stimulate one's sensory responses to the environment, with an amalgamation of colour, fragrances and texture and for evoking awareness of touch, smell, sight, sound and environment in the Garden. Audit observed that no guides were available in Garden of Five Senses.

### 2.6.9.3 Vacant stalls in *Dilli Haat* at Pitampura and Janakpuri

*Dilli Haat*, INA was opened (March 1994) to provide marketing space for artisans, where stalls (food stalls and craft stalls) have been allotted to various States to popularize their regional crafts and cuisines. Thereafter, *Dilli Haats* were opened at Pitampura (April 2008) and Janakpuri (July 2014) as well.

Audit observed that *Dilli Haats* at Pitampura and Janakpuri witnessed nominal footfalls ranging between 487 to 1,023 visitors per day, which could be attributed to high percentage of vacant stalls (65 to 78 per cent) during the period 2017-18 to 2019-20 as detailed in **Annexure 2.9**.

In *Dilli Haat*, Pitampura (DHPP), food stalls were lying demolished (as per photograph given below) since 2016 but the debris/construction material was not removed till date (29.09.2021). This also led to poor footfalls.

#### Photograph 8 and 9



Scrap material at DHPP as on  
21.09.2021



Scrap material at DHPP as on  
21.09.2021

DoT while accepting the fact stated (January 2022) that less footfall at *Dilli Haat* Janakpuri and Pitampura was due to areas surrounded by many *bazaars* /

commercial markets / malls, as such visitors have more choices for shopping and eateries. This renders the business of food and craft stalls less viable and loss making. The reply is not tenable because DTTDC/DoT had assessed the market and financial viability of Janakpuri Dilli Haat as Mega Tourism Project after preparation of Business Plan, Fixation of Tariff of commercial spaces, etc.

As regards debris at DHPP, DoT stated (January 2022) that the debris has been removed and the structure is being re-constructed. Fact remains that the debris was removed after being pointed out by Audit.

#### **2.6.10 Training**

GNCTD established (1983) the Delhi Institute of Hotel Management and Catering Technology (Institute). Audit observed that since April 2017, the Institute has not conducted any market survey for skills requirement to design its courses accordingly.

The Institute offered courses in four foreign languages<sup>30</sup> in 2018-19 and two foreign languages<sup>31</sup> in 2019-20. However, none of these courses were affiliated to any council/board. The number of seats in each course was 25 against which 74 and 117 students were enrolled during 2018-19 and 2019-20 respectively. However, the institute has not carried out any study to assess the impact of training on tourism.

The Institute framed (May 2015) a scheme, '*Atma Nirbharta Ki Aur*', for skill development of unemployed youth in hospitality sector. However, the scheme was yet to be implemented even after six years.

#### **2.6.11 Conclusion**

A successful Tourism Policy is based on deep understanding of the Tourism potential and requirement of existing and potential tourists. Data and research form the basis of such a Policy. The Department of Tourism and DTTDC had neither framed a tourism policy nor maintained any data on tourists visiting Delhi. Tourism requires inter-departmental consultation and co-operation as tourists look for information, transport, safety, shelter and suitable packages. The Archaeology Department did not constitute an Advisory Council depriving GNCTD of expertise of other departments. Absence of policy and data led to directionless approach. No new projects /schemes were undertaken during the audit period of four years. DTTDC incurred nominal expenditure of ₹ 279.39 crore on tourism during the period 2017-21. DTTDC could not achieve its primary objective of promoting tourism in the State. Its focus was mainly found to be on activities other than Tourism. Lack of monitoring led to failure of the schemes for tourists. HOHO bus service failed to achieve the desired results and service was discontinued in July 2020. Most of the

---

<sup>30</sup> French, Spanish, German and Japanese.

<sup>31</sup> Spanish and French.

schemes proposed were not implemented and resultantly, grant of ₹ 100 crore could not be obtained from GoI. There was poor upkeep and maintenance of monuments/tourist sites. The condition of test checked monuments was found dilapidated and many lacked basic facilities like toilets, lighting and information boards. GNCTD failed to have any successful strategy for development of Tourism in Delhi. DTTDC was used more for other purposes than Tourism and could not earn much revenue.

#### **2.6.12 Recommendations**

Tourists require information, safety, shelter, easily accessible transport and clean and well maintained tourist sites with necessary facilities. A suitable Tourism Policy addresses these concerns in a structured way.

The Government should:-

- Frame a tourism policy based on sound data and research and with help of experts in the field. Long term and short term action plans with road maps and milestones should be laid down. Studying tourist behavior, their requirements and sites of interest and concerted efforts to develop such sites are basic requirements of a sound policy.
- Have periodic inter- departmental consultations and constitute Advisory Board so that all the requirements of tourist like transport, safety, law and order, information, cleanliness, sanitary facilities, safe and economical hotels and restaurants, souvenir shops, accessible clinics, cultural entertainment, etc. could be made available.
- Develop a computerised integrated database to monitor tourist inflow and activities and integrate the same with targeted schemes. Need of promotional strategies, attractive and informative website, pamphlets, all round packages should be addressed within an appropriate timeframe.
- Devise a plan to strengthen Tourism Division of DTTDC by deploying the manpower earlier deployed in now closed Liquor Division. Suitable training to the staff should be provided.
- Devise an effective monitoring mechanism for successful implementation of its schemes and proper maintenance of monuments/tourist sites.
- National and International best practices should be studied and suitably implemented with proper entertainment strategies, addressing the behavior of tourists visiting Delhi.

## Directorate of Training: Union Territories Civil Services

### 2.7 Irregular payment of Training Allowance amounting to ₹ 168 lakh

**Grant of Training Allowance to staff posted at UTCS for administrative work, in violation to the instructions of the Department of Personnel and Training, resulted in irregular payment of Training Allowance to the tune of ₹ 168 lakh.**

Consequent upon introduction of the Fourth Pay Commission pay scales, the Department of Personnel and Training (DoPT), Government of India issued revised guidelines regarding improvement of conditions of faculty members in training institutions vide its OM No. 12017/2/86-Trg. (TNP) dated 31 March 1987. As per these guidelines, “When a Government employee, joins a training institution meant for training government officials as a faculty member, other than a permanent faculty member, he will be given a training allowance at the rate of 30 *per cent* of his basic pay”. This training allowance was admissible only to the faculty whose work is to impart training/teaching and not to others. The rate of training allowance was revised from time to time. The training allowance was also considered for leave salary and leave encashment payable at the time of retirement also.

Scrutiny of salary records from 2008-09 to 2020-21 (up to September 2020) revealed that the Union Territories Civil Services (UTCS) had paid ₹ 166 lakh to their employees who were not faculty members on account of STA. Besides, UTCS had also paid excess LTC leave encashment and retirement leave encashment (since Training Allowance forms part of basic pay for leave encashment) of ₹ 2.05 lakh to these employees. Thus, total payment of ₹ 168 lakh, paid to the employees posted at the UTCS, on account of training allowance, was irregular.

Audit observed that in November 2003, UTCS had sought concurrence of the Finance Department, GNCTD for payment of Special Training Allowance (STA) of 15 *per cent* to officials holding 11 posts<sup>32</sup> with retrospective effect stating that this will act as an incentive to the staff and also attract talented officers and officials for posting in the UTCS. The Finance Department concurred to the proposal in April 2004 w.e.f. 1 January 1988.

The proposal of the UTCS for granting of STA in respect of above noted 11 posts was *ab initio* irregular as these were administrative posts whereas, in terms of DOPT guidelines, only those employees who join a training institute as faculty members were eligible for training allowance. The Finance Department also erred in giving concurrence to the proposal as it did not interpret DOPT orders correctly.

<sup>32</sup> Secretary and Director (Training), Joint Director (Training), Deputy Director (Training), Assistant Director (Training), AAO, Sr. PA, Grades I to IV (DASS) and Grade III Steno.

UTCS stated (September 2021) that the officials to whom training allowance were being paid were functional faculties involved in activities such as preparation of training modules, training schedules, giving experience sharing sessions, introductory and valedictory sessions and therefore, were eligible for the training allowance.

The reasons in support of granting of training allowance to the employees given in their reply by the UTCS is not tenable. The staff to whom training allowance is being paid have been posted to the UTCS for administrative work including coordination work of training. There are no provisions in any of DOPT orders regarding functional faculties. The essence of DOPT OM dated 31 March 1987 is that only employees who join a training institution as a faculty member, other than as a permanent faculty member, is eligible for training allowance. Merely being part of the process of imparting training cannot be construed being faculty.

### **Directorate of Training and Technical Education - Netaji Subhas University of Technology**

#### **2.8 Irregular expenditure amounting to ₹ 66.25 lakh**

**Creation of two posts of Assistant Registrar by Netaji Subhas University of Technology without the approval of the Government of National Capital Territory of Delhi (GNCTD) resulted in irregular expenditure amounting to ₹ 66.25 lakh.**

Netaji Subhas University of Technology (NSUT) is an autonomous body fully funded by the GNCTD. In terms of Directorate of Training and Technical Education Office Memorandum (29 August 2002), Netaji Subhas Institute of Technology (later renamed as NSUT) was required to follow specific instructions issued by the GNCTD from time to time in addition to provisions contained in the Pattern of Assistance (PoA). Para-vi of the PoA states that after obtaining prior approval of GNCTD, the Institute may create posts under various categories within the framework of UGC/AICTE norms/guidelines for the purpose of meeting of objectives as enunciated in the profile of growth of the Institute.

Audit noted that, NSUT (erstwhile NSIT) created (March 2016) two additional posts of Assistant Registrars in the grade pay of ₹ 5400 as per 6<sup>th</sup> CPC, without taking prior approval of the GNCTD. One of these posts was in operation from April 2016 to April 2021 and during this period, an expenditure of ₹ 66.25 lakh was incurred on pay and allowances against this post. The other post of Assistant Registrar, though created, was not filled, hence there was no expenditure against the post. Since these posts were created without the approval of the Government, the expenditure of ₹ 66.25 lakh incurred on pay allowances against the same was irregular.

In reply, the NSUT stated (November 2021) that these two posts were created to cater to the additional work which arose due to increase in student intake and recruitment of new faculty and the posts were created by converting one vacant post each of Sr. Programmer and Senior System Software Engineer. It was also stated that a proposal for ex-post facto approval for the creation of these posts will be submitted to the Hon'ble Lieutenant Governor.

The reply is not acceptable since it was specifically mentioned in the PoA that creation of posts should be with the prior approval of GNCTD. Thus, creation of these posts without obtaining the prior approval of GNCTD which was irregular.

### **Urban Development Department**

#### **2.9 Blockade of fund of ₹ 114.01 lakh and loss of interest of ₹ 25.42 lakh by Delhi Jal Board**

**Erroneous payment of Road Restoration charges to South Delhi Municipal Corporation led to blockade of fund of ₹ 114.01 lakh and further consequent loss of interest of ₹ 25.42 lakh.**

As per Urban Development Department (UDD) office order dated 10 March 2016, it was decided that development works in all the unauthorised colonies in future be assigned to Delhi State Industrial Infrastructure Development Corporation (DSIIDC) as the sole agency.

Delhi Jal Board (DJB) awarded the work of 'Providing and laying 250 mm to 500 mm Dia DWC HDPE nominal Dia internal and peripheral sewer Line in Bhupender Singh Nagar group of colonies falling under Keshopur Waste Water Treatment Plant catchment area in Delhi' to a contractor at a cost of ₹ 3.01 crore vide work order dated 1 August 2017. The work was to be executed in three unauthorized colonies viz. Dharmapuri Colony, Ravi Nagar Extension and RZC-Block Vishnu Garden.

Scrutiny of files relating to Road Restoration (RR) charges revealed that an amount of ₹ 1,14,00,937/- was deposited by the DJB with South Delhi Municipal Corporation (SDMC) on 21 March 2018, as RR charges for this work. Since development works in unauthorized colonies were to be carried out by DSIIDC, no RR charges were to be paid to SDMC. Thus, the amount deposited with SDMC as RR charges was erroneous and led to blockade of funds of ₹ 114.01 lakh. The refund of RR charges was claimed by DJB vide letter dated 12 February 2019 but the matter was not pursued by DJB further and refund from SDMC is still awaited.

DJB stated (September 2021) that during execution, the work was stopped by SDMC authorities from time to time as permission for work was not taken from them, being road owning agency. Further, SDMC demanded RR charges of ₹ 114.01 lakh and the same was paid to them for obtaining permission for executing the work. However, during execution of work,

SDMC informed that roads of the area are not in their jurisdiction and money will be returned to DJB. But till date (August 2021) SDMC has not returned the money.

However, in view of UDD office order of March 2016 wherein it was stated that development works in all unauthorised colonies would be assigned to DSIIDC, DJB should have sought clarification from UDD with regard to the demand of SDMC before paying the RR charges.

Thus, payment of undue RR charges by DJB resulted in blockade of fund of ₹ 114.01 lakh and loss of interest of ₹ 25.42 lakh<sup>33</sup>. The amount has not been returned by SDMC even after more than three years.

## Department of Women and Child Development

### 2.10 Compliance Audit on Working Women Hostels of Government of National Capital Territory of Delhi

#### 2.10.1 Introduction

One of the main difficulties faced by women leaving their homes in search of employment in big cities is lack of safe and conveniently located accommodation. Providing adequate number of accommodation through Working Women Hostels (WWHs) would go a long way towards mitigating the problem of safe and secure accommodation to working women in Delhi.

As per Allocation of Business Rules, 1993, social welfare measures/activities of the Government of National Territory of Delhi (GNCTD), including those related to welfare of women, was the responsibility of the Department of Social Welfare (DSW). In November 2007, a separate Department, viz, the Department of Women and Child Development (DWCD), was carved out of DSW to give the much needed impetus to the holistic development of Women and Child Development and to ensure a state of wellbeing for women and children especially those of the weaker sections of society. DWCD has a Women Empowerment Cell which undertakes preventive, protective and empowerment measures concerning welfare and empowerment of women in Delhi.

As per DWCD website, preventive measures include providing dignified and affordable shelter to employed women who do not have any living accommodation in Delhi through WWHs. DWCD had two functional Working Women Hostel at Rohini and Vishwas Nagar. These hostels were run by Young Women Christian Association (YWCA), Delhi on 'No profit and No loss basis'. As per agreement, YWCA was responsible for upkeep and maintenance of furniture and fixtures, etc. whereas major repairs were to be carried out by the DWCD.

<sup>33</sup> Calculated @ 6.8% per annum for the period from 21 March 2018 to 30 June 2021), which is SBI base rate for 2 to 3 years of Fixed Deposits

Audit examined the efforts made DWCD, GNCTD for providing safe and secure accommodation for working women in Delhi during 2018-19 to 2020-21. Audit observations in this regard are discussed in the succeeding paragraphs.

### **2.10.2 Assessment of requirement of WWHs not done**

The first step in providing facilities of safe and affordable accommodation to working women in Delhi is to assess the number of working women who require accommodation so that construction of adequate number of WWHs can be planned and executed. The Planning Department, GNCTD had consistently mentioned setting up of more WWHs in their annual plans due to large number of women waiting for such accommodation and had mentioned full occupancy of existing hostels run by YWCA, Delhi on behalf of DWCD.

Audit, however, observed that DWCD did not have any data regarding the number of working women in Delhi who require accommodation. In the absence of information relating to number of working women seeking hostel accommodation, DWCD was not in a position to discharge its functions of planning and providing adequate number of WWHs to cater to needs of working women in Delhi.

In reply DWCD stated (May 2022) that there are 18 WWHs operational in Delhi under GoI scheme for WWHs which are being regularly monitored by DWCD and WWH at Vishwas Nagar will be made functional after completion of work.

The reply does not address the issue of absence of information regarding requirement of WWHs in Delhi.

### **2.10.3 Issues noticed in the functioning of WWHs**

DWCD had only two functioning WWHs, one at Rohini and one at Vishwas Nagar. These were operated and managed by YWCA till September 2019/August 2020<sup>34</sup>, after which YWCA expressed inability to manage them and had to be closed down. WWH Rohini and WWH Vishwas Nagar had capacity of 110 and 100 residents respectively.

#### **2.10.3.1 WWH, Rohini**

Audit observed that YWCA Delhi had communicated (July 2019) to DWCD, its inability for the management of WWH, Rohini. Reason attributed by YWCA, Delhi was inaction on the part of DWCD for repairs and maintenance issues pointed out by it since 2014 which were causing difficulties in the day to day administration of the women hostel. Besides, it had also reported lack

---

<sup>34</sup> These were entrusted to YWCA (August-September 2013) for their operations and management for a period of three years initially. The period was later extended to September 2019 and August 2020 for WWHs at Rohini and Vishwas Nagar respectively.

of proper water connection and charging of ₹ 1000 per month per resident by the Government which was deposited by YWCA.

As the concerns of the YWCA, Delhi were not duly addressed by the DWCD, the former did not show interest for renewal of the contract for running WWH Rohini. Finally, the hostel had to be closed in September 2019. At the time of closure there were 65 inmates residing in the hostel.

Department stated (December 2021) that YWCA was unable to manage WWH Rohini because of poor connectivity to the nearest metro station and difficulty in getting residents. It was also stated that no repair or infrastructure issues were brought to the notice of the Department.

The reply of DWCD is factually incorrect as repair and infrastructure issues were clearly brought out by YWCA, Delhi in its letter dated 26 July 2019 to the Director, DWCD.

### **2.10.3.2 WWH, Vishwas Nagar**

Similarly, YWCA Delhi had raised (April to October 2019) deteriorating condition of the hostel building such as development of cracks, broken tiles and seepage posing a risk to the residents. Moreover, during Joint inspection meeting of officials of PWD, DWCD and YWCA, Delhi (10 June 2019) the structure of hostel building was declared badly damaged and required immediate action to avoid any major incident. Audit however, noted that the work for repair and renovation could not commence (8 June 2020) due to non-finalization of estimates between the PWD and the Estate Branch, DWCD. Thus, due to the inaction on the part of the Department/PWD for early completion of renovation work of WWH, Vishwas Nagar the same had to be finally closed in August 2020. At the time of closure there were 78 inmates residing in the hostel.

The Department replied (December 2021) that it is regularly following up with the PWD to expedite the work.

Fact, however, remains that after closure of the hostel building for more than one and half years, the work of renovation was still incomplete.

Thus, due to the closure of these WWHs, 143 women residing at these hostels were deprived of safe and affordable accommodation due to failure of Government in addressing the concerns raised by YWCA regularly. As of August 2021, the DWCD did not have any WWH functioning under them.

### **2.10.4 WWH at Dwarka not operationalised**

A building was constructed at Dwarka by Social Welfare Department for the purpose of Old Age Home in the year 2008. It was later decided by the then Chief Minister (February 2011) to use the building for running WWH. Minister, WCD had issued direction (January 2013) to the Secretary, WCD to commence functioning of WWH at Dwarka on priority by selecting NGO

through Tender/Expression of Interest. The building was transferred to DWCD in March 2013. Audit noted that no action was taken by DWCD to operationalize the WWH for four years. DWCD invited Expression of Interest only in November 2017 to run this WWH. Applications from three NGOs were received but all the NGOs were found (November 2018) ineligible and re-tendering was recommended. Thereafter, Department did not take any further action to operationalize the WWH at Dwarka even after more than three years of scrapping the last tender. Thus, the building transferred in the year 2013 was lying unutilized for last eight years rendering the expenditure of ₹ 2.94 crore incurred on building wasteful.

DWCD replied (December 2021 and May 2022) that the pace of work was affected due to ongoing pandemic and tender document was now ready to be floated. Reply is not acceptable as the building remained unutilized for eight years since 2013, i.e. prior to COVID pandemic.

### **2.10.5 Delay in construction of WWHs**

As of March 2021, DWCD was in possession of five plots acquired for construction of WWHs from Delhi Development Authority. Four of these, at Vasant Village, Dheerpur, Tughlakabad and Dilshad Garden were allotted between 2001 and 2003 whereas one plot at Pitampura was allotted in 2014. Audit noted although DWCD was allocating budget for construction of WWHs projecting their requirement every year but no expenditure was incurred during the years by DWCD for construction of new WWHs. The status of plots acquired by DWCD for construction of WWH is detailed in following paragraph.

#### **2.10.5.1 Status of plots in possession of DWCD**

- **Vasant Village** -After taking over the plot in September 2002, DWCD directed (June 2016) PWD to prepare Administrative Approval and Expenditure Sanction (AA&ES) after a gap of 14 years. PWD submitted the AA&ES in May 2019 but DWCD was yet to approve the same as of August 2021, i.e., even after more than two years. DWCD stated (December 2021) that subsequent to a meeting held on 21 September 2021, PWD has been requested to revise the layout plan.
- **Dheerpur** - After taking possession of plot in November 2006, no action was taken by DWCD for construction of WWH, except construction of boundary wall in 2008. DWCD stated (December 2021) that a meeting was held with DDA officers in September 2021 to resolve long pending issues.
- **Tuglakhabad** - Against allotment of plot of 1000 square meters, DDA handed over (December 2004) possession of land measuring 821 square meters only. However, DWCD took up the issue of difference in size of land only in February 2015, i.e., after more than 10 years of taking

possession of the land. Audit observed that alternate plot was yet to be allotted by DDA as DWCD did not pursue the matter actively with DDA as the last communication in this regard was made in November 2019. In reply, DWCD stated (December 2021) that a meeting was held with AD (Land), DDA and many communications were made with DDA but no productive response was received.

- **Dilshad Garden** – DWCD took over possession of land in November 2014. DWCD had conveyed (February 2017) AA&ES amounting to ₹ 605.81 lakh to PWD for construction of the WWH after delay of three years. Subsequently, PWD informed (April 2018) that Extension of Time (EoT) and NOC for approval of plans from local body would be required from DDA. Audit observed that DWCD sought EoT and NOC from DDA in May 2018 and was yet to receive the same. DWCD stated (December 2021) that the issues of NOC and EoT is under process in DDA and lay out plan for WWH has been approved by the local body.
- **Pitampura** - DDA initially allotted (September 2001) a plot for WWH Pitampura, but the same could not be handed over to DWCD due to dispute of site with a Gurudwara. DDA re-allotted a plot (December 2014) at alternate site. The possession of plot was taken by DWCD in July 2015. Initially, DWCD nominated (September 2015) Delhi Tourism and Transport Development Corporation (DTTDC) as executing agency for construction of WWH and released (July 2017) payment of ₹ 6.47 crore. Later, Government decided (October 2017) to entrust the work to PWD. DTTDC had refunded (June 2020) the amount of ₹6.47 crore. No further progress was made in construction of WWH Pitampura. DWCD stated (December 2021) that they are in receipt of preliminary estimate of ₹ 5.14 crore from PWD (May 2019) for the WWH and they may issue the administrative sanction this year. Fact remains that AA&ES was not accorded to PWD for starting the construction of WWH despite a lapse of two and half years from date of receiving of preliminary estimates from PWD.

DWCD stated (May 2022) that a committee has been constituted for reviewing the status of utilisation of properties meant for WWHs.

#### **2.10.5.2 Status of plots allotted by DDA but not handed over to DWCD**

DDA had also allotted land for construction of WWHs at Nazafgarh Road, Janakpuri and Narela- I during the year 2001 and 2003 respectively.

In respect of plot at Narela-I, DWCD authorized PWD (December 2005) for making payment to DDA. Audit noted that DWCD was not aware of the payment made to DDA by PWD as it had requested PWD to provide the payment details (September 2010). Further, the Department replied (March 2021) that as per records available no payment was made to DDA.

In respect of plot at Nazafgarh Road, Janakpuri, ₹ 53.41 lakh was released to DDA (June 2003) by PWD. DWCD had not taken the possession of land. Audit noted that the said land was later allotted to Delhi Metro Rail Corporation. Subsequently, DWCD requested (December 2018) to DDA for allotment of an alternate site but no further progress was made in this regard.

Thus, due to utter laxity of the Government, there was no progress in construction of these WWHs even after more than 18 years of allotment of land for these WWHs by DDA. Further, consequent upon the closure of two WWHs in 2019/2020, DWCD was not operating even a single WWH in Delhi, thus failing in its responsibility of providing safe accommodation to working women in Delhi.

Delay in construction of WWHs also led to blockade of funds amounting to ₹ 2.37 crore on account of payments made to DDA against the plots of land allotted and expenditure on construction of boundary wall for these plots.

Apart from this, GoI was providing 60 *per cent* share to State Government for construction of WWHs under Working Women Hostel Scheme. In this regard, audit noted that DWCD, GNCTD did not seek central support for construction of WWHs.

#### **2.10.6 Conclusion**

GNCTD and Government of India (GoI) have separate schemes for construction and operation of WWHs. However, it was observed that GNCTD neither implemented the scheme of GoI nor gave due importance to providing safe and secure accommodation to working women in Delhi through its own scheme. In spite of having a scheme for construction of Working Women Hostels and plots of land for construction, DWCD neither assessed requirement of accommodation for working women nor constructed any new WWHs during the last 10 years. Plots for WWHs were acquired almost 15-20 years ago but as of March, 2021, even plans for construction have not been finalized. Further, due to its failure to address issues relating to maintenance of existing WWHs, the two functioning WWHs were also closed down in 2019/2020. Apart from this, it also failed to utilise a building handed over to it by the Social Welfare Department in 2013 for establishing a WWH.

Failure of DWCD in constructing new WWHs combined with closure of existing WWHs deprived working women of Delhi of much needed safe and secure accommodation. The inaction on the part of DWCD indicates Government's insensitivity towards women empowerment and its failure to discharge a major part of its functions towards the same.

### 2.10.7 Recommendations

The Government may –

- Take immediate action to assess the requirement of WWHs in Delhi.
- Take steps to construct and/or operationalize adequate number of WWHs so as to provide safe and secure accommodation to all the needy working women in Delhi.



New Delhi

(SAMAR KANT THAKUR)

Dated: 10 October 2022

Principal Accountant General (Audit), Delhi

Countersigned



New Delhi

(GIRISH CHANDRA MURMU)

Dated: 17 October 2022

Comptroller and Auditor General of India

