## National Judicial Academy

**P-1148:** Conference for High Court Justices on Direct Taxes  $11^{\text{th}} - 13^{\text{th}}$  January, 2019

| Programme Coordinator | : Mr. Yogesh Pratap Singh, Research Fellow |
|-----------------------|--|
| No. of Participants   | : 19                                       |
| No. of forms received | : 13                                       |

|   | I.                       | OVERALL                  |                   |         |
|---|--------------------------|--------------------------|-------------------|---------|
| PROPOSITION   | To a great extent        | To some extent           | Not at all        | Remarks |
| a. The objective of<br>the Program was<br>clear to me   | 69.23                    | 30.77                    | -                 | -       |
| b. The subject<br>matter of the<br>program is useful<br>and relevant to<br>my work                                    | 61.54                    | 38.46                    | -                 | -       |
| c. Overall, I got<br>benefited from<br>attending this<br>program  | 69.23                    | 30.77                    | -                 | -       |
| d. I will use the new<br>learning, skills,<br>ideas and<br>knowledge in my<br>work                                    | 61.54                    | 38.46                    | -                 | -       |
| e. Adequate time<br>and opportunity<br>was provided to<br>participants to<br>share experiences                        | 69.23                    | 30.77                    | -                 | -       |
|   | II.                      | KNOWLEDGE                | I                 |         |
| PROPOSITION   | To a great extent        | To some extent           | Not at all        | Remarks |
| The program provided  | knowledge (or provided l | inks / references to kno | wledge) which is: |         |
| a. Useful to my<br>work   | 46.15                    | 53.85                    | -                 | -       |
| b. Comprehensive<br>(relevant case<br>laws, national<br>laws, leading text<br>/ articles /<br>comments by<br>jurists) | 53.85                    | 46.15                    | -                 | -       |
| c. Up to date   | 53.85                    | 46.15                    | -                 | -       |

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| 1   |  |                       | 1  |              |
|---|--|-----------------------|--|--------------|
| d. Related to   |  |                       |  |              |
| Constitutional  | 46.15  | 53.85                 | -  | -            |
| Vision of Justice   |  |                       |  |              |
| e. Related to   |  |                       |  |              |
| international   | 50.00  | 50.00                 | -  | -            |
| legal norms   |  |                       |  |              |
|   | III. STRUCT  | URE OF THE PROC       | GRAM   |              |
| PROPOSITION   | Good   | Satisfactory          | Unsatisfactory   | Remarks      |
| a. The structure and<br>sequence of the<br>program was<br>logical | 61.54  | 30.77                 | 7.69   | -            |
| b. The program was  | an adequate combination  | on of the following n | nethodologies viz.   |              |
| (i) Case studies were<br>relevant                                 | 46.15  | 53.85                 | -  | -            |
| (ii) Interactive sessions<br>were fruitful                        | 46.15  | 53.85                 | -  | -            |
| (iii) Audio Visual Aids<br>were beneficial                        | 41.67  | 58.33                 | -  | -            |
|   |  |                       |  |              |
|   | IV SESSI   | ONS WISE VETTIN       | IG   |              |
|   |  | Parameters            |  |              |
|   | Discussions in individual sessions were<br>effectively organized |                       | The Session theme was adequately addressed by the Resource Persons |              |
| Session   | Effective and Useful   | Satisfactory          | Effective and Useful   | Satisfactory |
| 1   | 72.73  | 27.27                 | 77.78  | 22.22        |
| 2   | 63.64  | 36.36                 | 55.56  | 44.44        |
| 3   | 72.73  | 27.27                 | 66.67  | 33.33        |
| 4   | 81.82  | 18.18                 | 77.78  | 22.22        |
| 5   | 72.73  | 27.27                 | 75.00  | 25.00        |
| 6   | 63.64  | 36.36                 | 66.67  | 33.33        |
| 7   | 75.00  | 25.00                 | 50.00  | 50.00        |
| 8   | 66.67  | 33.33                 | 50.00  | 50.00        |
|   | V. PRO   | GRAM MATERIAL         | S  |              |
| PROPOSITION   | To a great extent  | To some extent        | Not at all   | Remarks      |
| a. The Program  |  |                       |  |              |

| b. | The content was<br>updated. It<br>reflected recent<br>case laws/ current<br>thinking/<br>research/ policy<br>in the discussed<br>area | 69.23 | 30.77 | - | - |
|----|---|-------|-------|---|---|
| c. | The content was<br>organized and<br>easy to follow  | 69.23 | 30.77 | - | - |

| VIII. GENERAL SUGGESTIONS                  |  |  |
|--|--|--|
| a. Three most important                    | 1. Participant did not comment.  |  |
| learning achievements<br>of this Programme | 2. Good knowledge on new laws including transfer pricing.  |  |
| or this r rogramme                         | 3. With no history of tax practice, the programme has guided me to a great extent.                         |  |
|  | 4. Interaction solved a number of problems in litigation.  |  |
|  | 5. Participant did not comment.  |  |
|  | 6. Participant did not comment.  |  |
|  | 7. Got good insights into income tax laws.   |  |
|  | 8. Participant did not comment.  |  |
|  | 9. 1. Burden of Proof and Law of Evidence in Tax Law; 2. Basic feature & constitutional aspect of tax law. |  |
|  | 10. Participant did not comment.   |  |
|  | 11. Participant did not comment.   |  |
|  | 12. Participant did not comment.   |  |
|  | 13. Participant did not comment.   |  |
| b. Which part of the                       | 1. Participant did not comment.  |  |
| Programme did you find most useful and     | 2. Entire programme was useful, Mr. Datar was insightful.  |  |
| why  | 3. Law of evidence in tax law & constitutional aspects of tax law as well as role of courts.               |  |
|  | 4. Sessions by Justice R.V. Easwar and Mr. Arvind P. Datar.  |  |
|  | 5. Participant did not comment.  |  |
|  | 6. Participant did not comment.  |  |
|  | 7. Discussion on transfer pricing.   |  |
|  | 8. Participant did not comment.  |  |
|  | 9. All except transfer pricing.  |  |
|  | 10. Participant did not comment.   |  |
|  | 11. Participant did not comment.   |  |
|  | 12. Participant did not comment.   |  |

|  | 13. Participant did not comment.  |
|--|---|
| c. Which part of the<br>Programme did you<br>find least useful and | 1. Participant did not comment.   |
|  | 2. Participant did not comment.   |
| why  | 3. Participant did not comment.   |
|  | 4. <i>Session 3: Interpretational Issues in Tax and Treaty Law-</i> as treaty laws do not come in Jharkhand High Court. |
|  | 5. Participant did not comment.   |
|  | 6. Participant did not comment.   |
|  | 7. All sessions were useful.  |
|  | 8. Participant did not comment.   |
|  | 9. Transfer pricing.  |
|  | 10. Participant did not comment.  |
|  | 11. Participant did not comment.  |
|  | 12. Participant did not comment.  |
|  | 13. Participant did not comment.  |
| d. Kindly make any   | 1. Participant did not comment.   |
| suggestions you may<br>have on how NJA may                         | 2. The course material (email copy) should be sent earlier.   |
| serve you better and   | 3. One of the sessions can include view of Government/Department on issue in hand.                                      |
| make its programmes more effective                                 | 4. For tax session resource person from revenue side should also be included.   |
|  | 5. Participant did not comment.   |
|  | 6. Participant did not comment.   |
|  | 7. Adherence to time schedules.   |
|  | 8. Participant did not comment.   |
|  | 9. Ensure the speaker (Resource Person) shall not skip from programme. There must be open discussion in every session.  |
|  | 10. Participant did not comment.  |
|  | 11. Participant did not comment.  |
|  | 12. Participant did not comment.  |
|  | 13. Participant did not comment.  |