

Innovation and Startup Policy



**Rayat Shikshan Sanstha's,
Karmaveer Bhaurao Patil College, Vashi**

**Sector 15A, Vashi, Navi Mumbai,
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Innovation and Start-up Policy

The Innovation and Start-up Policy for students and faculty members will enable the institute to actively engage students, faculty members and members of staff in innovation and entrepreneurship related activities. This framework will also facilitate in bringing clarity in involvement of stakeholders, support and performance parameters thus enabling creation of a robust innovation and Start-up ecosystem in the institute. This document states Start-up Enabling Institutional Infrastructure and practices for nurturing innovations and start-ups.

Preamble:

In order to enable us to understand the current role and involvement in streamlining and strengthening the innovation and start-up ecosystem in the University, MHRD's Innovation Cell (MIC) along with All India Council of Technical Education (AICTE) conducted Orientation Programs on the theme "Orientation and Adoption of NISP at HEI Level" in the month of August 2020 with the following learning objectives-

- Reason for adoption of National Innovation and Start-up Policy (NISP) by HEIs.
- Provisions and components in NISP for HEIs to implement.
- Desirable approaches, expected outcomes and their impacts.

Realising the importance of innovation, our college has established as centre named, **Rayat Centenary Centre for Invention, Innovation and Incubation [RC-CIII]** that is located at Kharghar, Navi Mumbai. This centre has collaboration with Science and Technology Park, Pune [DST] and TATA Technologies. It is dedicated to promote innovation and entrepreneurship. It is a pedestal to help knowledge driven enterprises to establish and prosper under organized scientific guidance. The main objective of the **RC-CIII** is to promote innovation and incubate the innovations to produce successful firms that will be financially viable and freestanding. These incubatees create jobs, commercialize new technologies, and strengthen national economy. Incubator tenants not only benefit from business and technical assistance, but also from official affiliation with the incubator, a supportive community with an entrepreneurial environment, direct link to entrepreneurs, and immediate networking and commercial opportunities with other tenant firms.

Vision:

To promote student entrepreneurs with innovative ideas of social relevance by introducing a culture of entrepreneurship in the campus this will strengthen our education system and promote the national economic and social growth.

Mission:

- To motivate, build and promote out of box thinking, development of innovative ideas.
- To build an environment that will facilitate the creation of social enterprise knowledge through research and empower students to apply their entrepreneurship abilities to develop solutions for greater social impact through academia.
- To orient the educational infrastructure of the institute towards start –ups and entrepreneurship opportunities for student and faculties.
- To strengthen the innovation-based entrepreneurship development infrastructure.
- To encourage the students, faculty and staff to consider start-ups and entrepreneurship as a career option.
- To provide enabling mechanisms to start-ups, through training and skill development, capacity building, networking, access to knowledge & support services, etc. on continuous basis.
- To provide the guidelines to stakeholders of the college for developing entrepreneurial agenda, managing Intellectual Property Rights (IPR) ownership, technology licensing and equity sharing in Start-ups or enterprises established by faculty and students

Objectives:

- To design and develop innovative products for social relevance.
- To create entrepreneurial culture among students and alumni.
- Focus more on innovation driven entrepreneurship from student projects.
- Encourage more women entrepreneurs.
- To promote start-up initiatives from faculties and students.
- To develop the skill sets that is required for becoming successful personalities in their life.
- To set up incubator facilities, provide start-ups such as mentoring, financial, technological, intellectual property related to cost-effective infrastructural support and value added services.
- Assist the area in setting up a forum to foster faculty and students' imagination, innovation and entrepreneurial skills.

Short and Long Term Goals:

- To improve innovation, creative and design thinking among students.

- Strengthen institute industry interaction cell activity and effectively use the outcomes for achieving the mission.
- To tie up with institutions/organizations for promoting entrepreneurship.
- To arrange motivational entrepreneurial talks to develop novel ideas among the students and faculties.
- To identify small projects associated with promotional activities.
- To conduct Short Term Certificate Courses on real time entrepreneurship.
- To organize programs for skill development and capacity building.
- To arrange Industrial/field visits for practical experience.
- Help at least 10 student groups to begin a start-up within college incubation facility.
- Improve quality of research work among the students and to attain patent which can be commercially used in the production.
- Provide a platform for the students to develop innovative products with global recognition and generate business opportunities.
- Spread awareness to students and faculty regarding IPR related activities and to promote zero investment projects.

1. Strategies and Governance:

Entrepreneurship promotion and development is one of the major objectives of the institute. Faculty and Students are encouraged to come out with innovative ideas and try them out in the incubation centres and convert them to products that would enable entrepreneurship and start-ups. To enable this faculty/student friendly system is evolved and faculty and students can access the incubation facilities without many hassles. This initiative has created a pathway towards development of culture among students and faculties to adopt entrepreneurship as one of the carrier options. The following steps have been taken to implement start-up policy. With the help of Innovation and Start-up policy, the college intends to create an ecosystem that can generate an entrepreneur in every family.

- a) To facilitate development of an entrepreneurial ecosystem in the institute, specific objectives and associated performance indicators shall be defined for assessment.
- b) To promote innovation culture through institutional programs like workshops, conferences, webinars, etc.
- c) To invest a minimum of 1% of its annual budget for activities related to the promotion of innovation, entrepreneurship and intellectual property rights management.

- d) For expediting the decision making, hierarchical barriers will be minimized and individual autonomy will be given to the incubator.
- e) To conduct programs to foster the innovation and entrepreneurship culture through financial aid from the government and Non-governmental agencies

Resource mobilisation

Resource mobilisation plans will be employed for supporting the pre-incubation, incubation infrastructure and other facilities. A sustainable financial strategy should be defined in order to reduce the organizational constraints to work on the entrepreneurial agenda.

- (i) The institute will provide infrastructure and facilitate to promote innovation and start-ups related activities.
- (ii) To support incubators and incubatees, the institute may approach private and corporate sectors to generate funds, under Corporate Social Responsibility (CSR) as per Section 135 of the Company Act 2013.
- (iii) The institute may also increase funding through sponsorships and alumina's funding and will actively engage alumni network for promoting Innovation and Entrepreneurship cell.
- (iv) The institute will also work with industries/ Venture Capitalist / Govt. institutions to set up a "Student Start-up Fund" to support outstanding start-ups.

Innovations and Start-ups:

The institute will establish processes and mechanisms for easy creation and nurturing of Start-ups/enterprises by students (UG, PG, and Ph.D.), staff (including temporary or project staff), faculty, alumni and potential start up applicants even from outside the institutions. While defining their processes, institutions will ensure to achieve following: RC-CIII seeks to support all members of the (KBPC), Vashi to translate innovations into the products, processes and services those are commercially viable. Admission to RC-CIII is open to: Inculcate innovation and entrepreneurship knowledge across the faculty and students by

- i. Conducting summer schools, awareness programs and training sessions for the students and faculty to write proposals for innovation.
- ii. Conducting orientation programs for all.
- iii. Encouraging students and faculty to attend free International & National Seminar and workshops online programs.

- iv. Innovator centric provision for industrial visits periodically to stimulate & the opportunity to observe the innovation and strategy coupled with the business.
 - v. Ideas collection from all the students/ faculties of the KBPC with an idea box.
 - vi. Conducting number of Hackathons among students community to increase awareness on innovations and start-ups.
- a) The students may be permitted to undertake their Industrial and Project work at CIII centres where additional facilities are available on payment mode.
 - b) The students' entrepreneurs working on a Start-up idea from first year will be permitted to convert into their final year project for degree completion.
 - c) The students/Research Scholars can avail special leave for a semester to work for a Start-up on a fulltime basis.
 - d) The gap year facility should ensure syllabus continuity at the time of joining back and after an appraisal process by an incubator where the student is attached
 - e) Engagement of Faculty in Start-up activities
 - i. The faculty members of the institute shall be involved as mentors to provide technical expertise or provide capital investment alone. The capital investment of permanent faculty is treated as a purely private commercial transaction for which college is not responsible.
 - ii. The permanent faculty members who wish to involve in Start-up on a part time basis can spend a day in a week in the Start-up in addition to their teaching, research and other official activities.
 - iii. The contract faculty / Research staff who wish to involve in Start-up can spend a day in a week in the Start-up in addition to their teaching, research and other official activities.
 - iv. The committee constituted for the purpose shall take decision in granting a Start-up by assessing the proposal submitted indicating the interest/ feasibility/ innovation/ market potential etc. The committee also will review the progress quarterly.
 - v. Revenue generated in the start-up company of faculty incubated at CIII shall be shared between faculty and KBPC in the ratio of 70 % and 30% respectively for duration as per policy.
 - vi. Participation in Start-up related activities needs to be considered as a legitimate activity of faculty in addition to teaching, R&D projects, industrial consultancy

and management duties and must be considered while evaluating the annual performance of the faculty.

- vii. Every faculty may be encouraged to mentor at least one Start-up.
- viii. In order to attract and retain right people, institute should encourage academic and non-academic incentives and reward mechanisms for all staff and stakeholders that actively contribute and support entrepreneurship agenda and activities.
- ix. The reward system for the staff may include sabbaticals, office and lab space for entrepreneurial activities, reduced teaching loads and awards.
- x. A performance matrix should be developed and used for evaluation of annual performance.

1.1 Creating Innovation Pipeline and Pathways for Entrepreneurs:

- A. To ensure exposure of maximum students to innovation and pre incubation activities at their early stage and to support the pathway from ideation to innovation to market, mechanisms should be devised at the institute.
 - i. Spreading awareness among students, faculty and staff about the value of entrepreneurship and its role in career development or employability should be a part of the institutional entrepreneurial agenda.
 - ii. Students/ staff should be taught that innovation (technology, process or business innovation) is a mechanism to solve the problems of the society and consumers. Entrepreneurs should innovate with focus on the market niche.
 - iii. Students would be encouraged to develop entrepreneurial mindset through experiential learning by exposing them to training in cognitive skills (e.g. design thinking, critical thinking, etc.), by inviting first generation local entrepreneurs or experts to address young minds. Initiatives like idea and innovation competitions, hackathons, workshops, boot camps, seminars, conferences, exhibitions, mentoring by academic and industry personnel, throwing real life challenges, awards and recognition should be routinely organized.
 - iv. To prepare the students for creating the start up through the education, integration of education activities with enterprise-related activities would be done.
- B. The institute would link its start-ups and companies with wider entrepreneurial ecosystem and by providing support to students who show potential, in pre-start-up phase. Connecting student entrepreneurs with real life entrepreneurs will help the students in understanding real

challenges which may be faced by them while going through the innovation funnel and will increase the probability of success.

C. The institute will establish Institution's Innovation Councils (IICs) as per the guidelines of MHRD's Innovation Cell and allocate appropriate budget for its activities. IICs should guide institutions in conducting various activities related to innovation, startup and entrepreneurship development. Collective and concentrated efforts should be undertaken to identify, scout, acknowledge, support and reward proven student ideas and innovations and to further facilitate their entrepreneurial journey

D. For strengthening the innovation funnel of the institute, access to financing must be opened for the potential entrepreneurs.

- i. Networking events must be organized to create a platform for the budding entrepreneurs to meet investors and pitch their ideas.
- ii. Provide business incubation facilities: premises at subsidised cost. Laboratories, research facilities, IT services, training, mentoring, etc. should be accessible to the new start-ups.
- iii. A culture needs to be promoted to understand that money is not FREE and is risk capital. The entrepreneur must utilize these funds and return. While funding is taking risk on the entrepreneur, it is an obligation of the entrepreneur to make every effort possible to prove that the funding agency did right in funding him/ her.

1.2 Organizational Capacity, HR and Incentives to support and promote innovative and entrepreneurial activities:

- The institute would recruit staffs that have a strong innovation and entrepreneurial/ industrial experience, behaviour and attitude. This will help in fostering the Innovation and Entrepreneurship culture at KBPC.
- To achieve better engagement of staff in entrepreneurial activities, institutional policy on career development of staff would be developed with constant upskilling.
- Faculty and departments of the institute have to work in coherence and interdepartmental linkages should be strengthened through shared faculty, cross-faculty teaching and research in order to gain maximum utilization of internal resources and knowledge.
- Faculty and staff should be encouraged to do courses on innovation, entrepreneurship management and venture development, wherever permitted by corresponding statutory authorities.

- Periodically some external subject matter experts such as guest lecturers or alumni will be engaged for strategic advice and bringing in skills which are not available internally.
- In order to attract and retain right people, KBPC institute would develop academic and non-academic incentives and reward mechanisms for all staff and stakeholders that actively contribute and support entrepreneurship agenda and activities.

1.3 Collaboration, Co-creation, Business Relationship and Knowledge

Exchange:

- Linkages and collaboration will be made with potential entrepreneurship enabling firms, social enterprises, professional bodies, alumni to strengthen the Innovation and Entrepreneurship ecosystem.
 - Stakeholder engagement would be given prime importance in the entrepreneurial agenda of the institute. Institutes would find potential partners, resource organizations, micro, small and medium sized enterprises (MSMEs), social enterprises, schools, alumni, professional bodies and entrepreneurs to support entrepreneurship and co-design the programs.
 - Feedback and suggestions should be received from the stakeholders to strengthen the innovation ecosystem in the campus.
 - The institute should develop policy and guidelines for forming and managing the relationships with external stakeholders including private industries
 - Knowledge exchange scheme through collaboration and partnership should be made a part of institutional policy and institutes must provide support mechanisms and guidance for creating, managing and coordinating these relationships.
- i. Through formal and informal mechanisms such as internships, teaching and research exchange programmes, clubs, social gatherings, etc., faculty, staff and students of the KBPC institute should be given the opportunities to connect with their external environment.
 - ii. Connect of the institute with the external environment must be leveraged in form of absorbing information and experience from the external ecosystem into the institute's environment.
- For all the activities relevant to the entrepreneurial agenda of the institute, participation and collaboration of industry partners, institutes of national importance,

international institutions, social enterprises, alumni, professional bodies and entrepreneurs will be encouraged.

- The Principal of the college will be single point of contact (SPOC) in the institute for the students, faculty, collaborators, partners and other chairpersons.

2. Norms for Faculty & Students Driven Innovations and Start-ups:

The Institute will facilitate the start-up activities development by allowing students/faculty/ staff to use institute infrastructure and facilities, as per the choice of the potential entrepreneur in the following manners:

✚ Norms for Students Start-ups

- 1) Students will be allowed to set up a start-up (including social start-ups) and work part time for these start-ups while studying.
- 2) Student inventors will also be allowed to opt for start-up in place of their mini project/ major project, seminars, summer trainings, with approval from Chief Co-ordinator (Academic), and head of the institution.
- 3) Students will be permitted to use the start-up idea / prototype development as their major project work for the Institute academic requirements. The area in which student wants to initiate a start-up may be interdisciplinary or multidisciplinary.
- 4) Students will be allowed for semester/year break or even more depending upon the decision of review committee constituted by the institute (after sixth semester), to work on their start-ups and re-join academics to complete the course.
- 5) Students who are under incubation, but are pursuing some entrepreneurial ventures while studying to be allowed to use their address in the institute to register their company with due permission from the head of the institution.

✚ Norms for Faculty Start-ups

- 1) Mentorship support for faculty members on regular basis.
- 2) Faculty and departments of the institute have to work in coherence and cross departmental linkages to be strengthened through shared faculty, cross-faculty teaching and research in order to gain maximum utilization of internal resources and knowledge.
- 3) Institute may also link the start-ups too the seed-fund provider/angel funds/venture funds or itself may set up seed-fund once the incubation activities mature.
- 4) Role of faculty may vary from being an owner/ direct promoter, mentor, consultant or as on-board member of the Start-up.

- 5) Institutes should work on developing a policy on 'conflict of interests' to ensure that the regular duties of the faculty don't suffer owing to his/her involvement in the Start-up Activities.
- 6) Faculty Start-up may consist of faculty members alone or with students or with faculty of other institutes or with alumni or with other entrepreneurs.
- 7) In case the faculty/staff holds the executive or managerial position for more than three months in a Start-up, they will go on sabbatical/leave without pay/utilize existing leave.
- 8) Faculty must not involve research staff or other staff of Institute in activities at the Start-up and vica- versa.
- 9) Faculty must not accept gifts from the start-up.
- 10) Human subject related research in Start-up should get clearance from ethics committee of this Institution.
- 11) Faculty must clearly separate and distinguish on-going research at the institute from the work conducted at the Start-up /company.
- 12) In case the faculty/ staff holds the executive or managerial position for more than three months in a Start-up, they will go on sabbatical/leave without pay/utilize existing leave.
- 13) In case of selection of a faculty start up by an outside national or international accelerator, a maximum leave (as sabbatical/ existing leave/ unpaid leave/ casual leave/ earned leave) of one semester/ year (or even more depending upon the decision of review committee constituted by the institute) may be permitted to the faculty.

2.1 Incentivizing Students for Entrepreneurship and Start-up pursuits.

1. The research scholar/students can seek permission from the institute to take special leave (SPL) for one year, as per prevailing rules and regulations and may work full time for the start-up.
2. Research scholars/students will not receive any fellowship when he/she is on SPL.
3. During the period of SPL, the research scholar/student can receive compensation from the start-up in cash which need not be shared with the institute.
4. The research scholar/student will be allowed to obtain shares of the start-up/company as compensation for engagement with the company in part or in full, in lieu of cash payment. Moreover, he/she will not need to share any part of these shares with the institute as he/she will not be receiving any fellowship during this period.

5. The research scholar/student, on returning, has to satisfy all norms including attendance requirements for his/her program of study in order to earn a degree.
6. The research scholars/students can seek permission from the college to work for a start-up on a part-time basis as per prevailing rules.






2.2 Incentivizing faculty and Staff for Entrepreneurship and Startup pursuits

1. Faculty members will be trained periodically with an exposure to promote innovation and entrepreneurship.
2. Faculty members will be encouraged to do courses on innovation, entrepreneurship and IPR management.
3. The Guest lectures and expertise will be availed for the students or faculty members.
4. The faculty incoherence and cross-departmental linkages will be strengthened through shared faculty, cross-faculty teaching and research in order to gain maximum utilization of internal resources and knowledge.
5. The reward mechanism will be formulated and provided for faculty members involving themselves in innovation, entrepreneurship, venture development and IPR management.

3. Incubation & Pre-incubation support and facility creation in HEIs:

CIII-E seeks to nurture technology and knowledge-based ventures through their start-up phase by providing the necessary support to help entrepreneurs survive in the competitive market and reach a stage where they can scale-up their ventures further. The institute aims to build and share resources including space and infrastructure, access to business support services, mentoring, training programmes to enhance the skills of entrepreneurs and seed funds. The scope of support is broad based, and covers technologies/IP developed wholly at the Institute or partly through collaborations elsewhere, as well as external start-ups with which members are associated as consultants or mentors. The institute is also particularly open to proposals with strong social and strategic impact:

3.1 Pre-incubation facility

-  This is to be used by students of the institute.
-  Students to be enrolled in Pre-incubation facility.
-  Each student to have a faculty member as mentor.
-  This is a support system for students to “test” their ideas.
-  They will be given 6 months’ time to validate their ideas

- ✚ Pre-incubatees will get space in the incubator or any other departments to establish proof of concept.
- ✚ Institute to provide seed funding if possible.
- ✚ Pre-incubation Centre will be accessible to all interested students and faculty members.
- ✚ Pre-incubatees to undergo training in Incubation Centres (CIII) to understand more about innovation and entrepreneurship.
- ✚ Pre-incubation period will be for a period of 6 months.

3.2 Incubation Centre

- ✚ After their innovative ideas are validated, they can register a Start-up company.
- ✚ Eligibility criteria: Students who have completed pre-incubation, Alumni of the University, regular faculty, individuals partnered with Faculty.
- ✚ Upon admission in the incubation centre, the following facilities will be offered to the incubate companies on chargeable basis as decided by the institute
 - Office space
 - Computers and Library
 - Printer and Scanner
 - Internet connection
 - Standard Furniture as decided by KBPC-CIII/Incubators
 - Basic and advanced instruments of KBPC
 - Meeting and conference rooms with video conferencing facilities.

4. IP ownership rights for technologies Development and transfer in HEIs:

The students/ Faculty members who are developing and demonstrating proof of concepts of their ideas in minor and major project exhibitions, inter-institute competitions, hackathons etc. are facilitated in Technology Business Incubator -Fab lab and Innovation Center to convert their PoCs into MVPs. Emphasize the significance of intellectual property among all sectors in the society and stimulate creation of intellectual property by undertaking appropriate measures. Modernize and strengthening the IP administration to catalyze and commercialization of IP rights as well as capacity development by strengthening and expanding human resources, institutions for training, research and skill building in IP.

- Intellectual Property (IP) is a form of “intangible asset” which relates to creations of the human mind. Intellectual Property Rights (IPR) is legal rights granted to creators

of IP to give them protection over their intangible assets. IP offers a myriad of options: exploiting, licensing, cross-licensing, attract investment etc.

- When institute facilities / funds are used substantially or when IPR is developed as a part of curriculum/ academic activity, IPR is to be jointly owned by inventors and the institute.
- If the product/ IPR is developed by innovators not using any institute facilities, outside office hours (for staff and faculty) or not as a part of curriculum by students, then product/ IPR will be entirely owned by inventors in proportion to the contributions made by them. In this case, inventors can decide to license the technology to third parties or use the technology the way they deem fit.
- Institute IPR cell or incubation center will only be a coordinator and facilitator for providing services to faculty, staff and students. They will have no say on how the invention is carried out, how it is patented or how it is to be licensed.
- If institute is to pay for patent filing, they can have a committee which can examine whether the IPR is worth patenting. The committee should consist of faculty who have experience and excelled in technology translation. If inventors are using their own funds or non- institute funds, then they alone should have a say in patenting.
- Institute's decision-making body with respect to incubation / IPR / technology licensing will consist of faculty and experts who have excelled in technology translation.
- When an intellectual property right is developed with the institute's resources, joint ownership or acknowledging the institute has to be ensured.
- When institution or incubation facilities funds are used substantially or when IPR is developed as a part of curriculum/ academic activity, IPR is to be jointly owned by inventors and the KBPC.
- If there is a dispute in ownership minimum 5 members committee consisting of faculty members with expertise in IPR, alumni or industrial experts, legal Advisors with experience in IPR will examine the issue and settle the same.
- The institute's decision-making body with respect to incubation / IPR / technology-licensing will consist of faculty and experts who have excelled in technology translation.
- The institute with CIII incubation centre will only be a coordinator and facilitator for providing services to faculty, staff and students. When the institute is paying for

patent filing, it will constitute a committee which can examine whether the IPR is worth patenting. The committee should consist of faculty who have experience and excelled in technology translation. If inventors are using their own funds or non-university funds, then they alone should have a say in patenting.

- Incubatees (Students/Faculty/Alumni) should fill in IP declaration form and declare the Intellectual Property developed and already owned by the incubate company.
- The incubating company shall inform the institute any student has contributed for technology development to be used in the product(s) development.
- The incubating company shall inform to the institute if any IP has been generated as a result of collaborative work with faculty members (who are not Incubatees) and is being incorporated into the product(s).
- The incubate company shall make agreement with the institute before commercialization is done using the infrastructure/goodwill of the institute..
- The incubation centre would maintain a register with the details of any IP (patents, licenses, copyrights etc) that has been brought into the company prior or during incubation period at the institute.

5. Pedagogy and Learning Interventions for Innovation and Entrepreneurship Development:

- Innovation and Entrepreneurship Cell is responsible for organizing competitions, workshops, awards, etc. A separate E-cell run and administered by students is totally involved in strategic planning and implementation of these activities.
- Innovation champions should be nominated from within the students/ faculty/ staff for each department/stream of study.
- Industry Experts may be leveraged to teach courses at incubators and students who are interested may elect these courses.
- Inviting national and international experts related to entrepreneurship on a regular basis to strengthen Start-up effort.
- Institute should start annual 'INNOVATION & ENTREPRENEURSHIP AWARD' to recognize outstanding ideas, successful enterprises and contributors for promoting innovation and enterprises ecosystem within the institute.
- The institute to host Start-up related National/International level workshops and conferences to promote Innovation and start-ups.

- To promote student ideas, projects and innovations based around real life challenges, boot-camps, visits to rural and underprivileged areas in nearby region.
- The Departments at the institute shall be advised to change the course curriculum to be in tune with the emerging technologies and align to the requirements of the Industry and to introduce courses in entrepreneurship development through incubators.

6. Entrepreneurial Performance Impact Assessment:

The various parameters to be considered for Entrepreneurial Impact are satisfaction of the participants in micro degree certification program, workshops and training programs,

- Participation in awareness programs
- Utilization of pre-incubation facilities by students
- Number of curriculum projects addressing real life problems
- Participation in pitching for fund raising and grants/support from government and non-government agencies
- Contribution in industrial projects and consultancy projects
- Product development and its launching in the market
- Start-up registrations and company incorporation.

Acknowledgements: We thank National Innovation and Start-up Policy (NISP) Implementation team for this initiative and providing guidance throughout the process. We express sincere gratitude to Hon. Dr. Anil Patil [Chairman, Rayat Shikshan Sanstha, Satara] for nurturing and realising the vision of developing the RC-CIII. Our humble thanks to Hon. Dr. V.S. Shivankar, Secretary of Rayat Shikshan Sanstha's, Satara for working relentlessly to develop the world-class facility at RC-CIII. Our special thanks to Hon. Mr. Ramsheth Thakur [Chairman, College Development Committee] for constant support and encouragement. We thank all the members of Innovation and Entrepreneurship Cell (IEC) for brainstorming and developing the start-up policy for students and faculty members of the institute.



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